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Ms. Jessica Evans, Director of Standards Development
NSF International
789 N. Dixboro Road
Ann Arbor, MI 48105

Re: Regenerative Organic Certification (ROC) Standard

Dear Ms. Evans:

Thank you for the opportunity to provide comments on the Recommended Framework for Regenerative Organic Certification (ROC). The Accredited Certifiers Association (ACA) is a non-profit educational organization, and our membership includes 54 USDA Accredited Certification Agents. All members certify to the USDA National Organic Standards, and some certify to additional standards as well. These comments are put forth by the ACA Board of Directors with input from the membership.

Although we recognize that the work of the ROC Standard is broad in scope, our current comments are limited to two initial concerns.

1) There seems to be a general lack of clarity regarding how accreditation and oversight of the program would be handled.

- We have been informed that a new nonprofit will be developed who will hold the framework for the standard, but we haven't learned anything about the makeup of the organization or how the ownership of the standard will be different than accreditation and licensing of the standard.
- We are also informed that the standard will likely be implemented by NSF International, who is also the owner of an organic certification body. If accreditation and approval is handled by NSF International this would undoubtedly be a conflict of interest due to their vested interest in a competing certification body. We are requesting that structure, ownership and licensing and accreditation be clearly defined, and requirements for approval as a certification body to these standards be outlined for comment, prior to any implementation.

2) It is unclear whether use of the term *organic* in a separate standard outside of the USDA National Organic Program Standards is or could be sanctioned by the USDA.

As you are aware the term organic as it relates to being used on agricultural products in the US, is under the control and jurisdiction of the USDA National Organic Program. It is unclear, and has not been demonstrated, that this new certification scheme would be approved and

allowed on agricultural products in the US. We respectfully request evidence or an analysis of how the term organic in “Regenerative Organic” can be used.

Once these questions are addressed and resolved, we would appreciate the opportunity to comment on the details of the standard itself. However we feel that these two major issues with use of the term organic and structure, ownership and accreditation are critical to address before any further development of the standards are done.

Respectfully Submitted,



Kyla Smith
ACA Board Chair