



**Accredited Certifiers Association**  
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September 30, 2021

Ms. Michelle Arsenault, Advisory Committee Specialist  
National Organic Standard Board  
USDA-AMS-NOP 1400 Independence Ave. SW.,  
Room 2642-S, Mail Stop 0268  
Washington, DC 20250-0268

Re: Docket Number: AMS-NOP-21-0038  
Policy Development Subcommittee (PDS): Public Comment Process Discussion Document

Dear Ms. Arsenault:

Thank you for the opportunity to provide comments to the National Organic Standards Board (NOSB) Policy Development Subcommittee (PDSS) on the discussion document on the Public Comment Process. The Accredited Certifiers Association (ACA) is a 501(c)(3) nonprofit educational organization created to benefit the organic certifier community and the organic industry. The ACA strives to ensure consistent implementation of the USDA Organic Regulations through collaboration and education of accredited certification agencies. We are committed to upholding organic integrity and maintaining stakeholder trust to facilitate the growth of the organic industry. Our organization is made up of 61 USDA NOP accredited certifying agencies worldwide, which includes 46 accredited certifiers headquartered in the United States. We are the frontline decision-makers for the effective implementation of the National Organic Program.

The ACA appreciates that the subcommittee is considering the format of the public comment process. ACA representatives and ACA members have long attended NOSB meetings and given public comments, both written and orally, and the ACA appreciates the seamless transition to virtual NOSB meetings that have taken place for recent meetings. We agree that it is important to consider the best, most accessible format of these meetings.

The ACA agrees that having a virtual option for both comments and the NOSB meeting itself is beneficial for many reasons: it reduces travel fatigue, anxiety, and illness. It can cost less, both for those planning the meeting, who do not need as large of a space, and for those who no longer need to travel to the meeting. It also enables more attendance at the meeting. The



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NOSB meetings are held in April and October, times that are notoriously difficult for farmers to travel due to planting and harvesting, respectively; therefore, a virtual format can allow for attendance from farmers who were previously unable to get away. In addition, in the past, NOSB meetings have been held over holidays, which can be a difficult time to travel; again, a virtual option is more convenient for these instances. The ACA values the in-person connection that the NOSB meetings allow for, but having only in-person meetings may not be as important as having this broader audience that the remote meetings allow for. The ACA does support the continued use of Zoom or similar software for meetings and comments; this is more effective and engaging than a live stream. Regardless, the ACA supports continuing to have a virtual option for comments to the NOSB and the NOSB meeting itself.

In addition, the ACA supports a fully remote comment period that happens in advance of the NOSB meeting. One additional day of remote public comments may allow for all of the comments to be heard virtually. The public comment process is so important, and the ACA has concerns that the members of the NOSB do not have enough time to digest and consider comments given in-person during the meeting, simply due to time constraints. We would support giving both oral and written public comments even earlier, so that NOSB members have the proper time to consider and research all comments as needed.

Finally, the ACA supports a more equitable distribution of oral public comment slots. For example, each organization could have the opportunity to give one comment first, and then additional comments can be heard from the same organization once all organizations have been heard. Alternatively, if commenters can accurately identify their topics, then comments could be scheduled so that each comment on a unique topic from one organization gets a chance, and then commenters from the same organization on the same topic can be scheduled if slots remain. The ACA would also support a hard time limit for questions to the commentators from the NOSB to allow for a more efficient comment process.

Thank you for considering improvements to the public comment process.

Sincerely,

Jennifer Berkebile



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