



Accredited Certifiers Association

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October 1, 2026

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

Re: Docket Number: AMS-NOP-26-0892 National Organic Standards Board Meeting Fall 2026

Dear Ms. Arsenault:

Thank you for the opportunity to provide comments to the National Organic Standards Board (NOSB).

The Accredited Certifiers Association (ACA) is a 501(c)(3) nonprofit organization focused on ensuring consistent interpretation and implementation of the USDA Organic regulations. We advance professionalism, consistency, and integrity in organic certification by providing training, facilitating collaboration, and developing shared resources and guidance. ACA serves as a critical bridge among the USDA National Organic Program (NOP), accredited certifiers, and the broader organic community. Our membership includes 62 certifiers representing 98% of U.S.-based NOP-accredited certifiers, as well as a growing network of international certification agencies, associate members, and inspectors.

We are pleased to offer comments on integrating livestock and agroforestry crops, ivermectin for treatment of new world screwworm, consistency in organic seed use, and residue testing for a global supply chain. We will also share some perspective on streamlining certification, as well as some more general comments about the organic workforce and community.

General Comments

We are pleased to see the NOSB back to its full cohort, and in particular are glad that the certifier voice is being represented again. The work of the Board is challenging, and it is critical that all perspectives - from farmer to handler; certifier to scientist; and consumer to retailer - are represented. ACA stands ready to support the Board in whatever way possible, including ensuring that the certifiers' voice is heard and considered.

ACA does not offer specific comments on materials or petitions. In general, we support relisting a material when it is used by organic producers, there are no viable organic alternatives, and the material is compatible with organic principles. We encourage the National Organic Standards Board to carefully consider the impact of removing a material. Producers need a variety of tools available to them, and the inclusion of a material on an organic system plan (OSP) indicates that a producer may need to use the material under certain circumstances.

Should NOSB approve any of the proposals discussed below, we strongly recommend that the NOP include a full rulemaking process, including a 60-day public comment period, before adoption. A formal comment period through the rulemaking process is necessary to ensure sufficient public engagement and stakeholder input.

Integrating Livestock and Agroforestry Crops - Discussion Document

We appreciate the Subcommittee's work on this topic. Our members have indicated to us a few concerns we would like to elevate as the Board continues its discussions.

Certifiers are already taking risk-based site-specific approaches to application of the 90/120 day rule in the context of animal grazing in organic agriculture. Are we seeing problems that need to be solved through NOSB or NOP guidance, or is this an area where driving toward increased certifier consistency in how we apply existing risk-based approaches would suffice? We encourage the Board to consider what tool is right-sized for any concerns that must be resolved.

If the Board decides that NOSB or NOP guidance is needed, we urge the avoidance of any action that would place food safety risk analysis on organic certifiers. This would be problematic for a few reasons. First, it is beyond the organic regulations. Second, putting organic certifiers in the position of evaluating whether specific activities may cause contamination or food safety concerns - which the Discussion Document currently does - goes beyond the expertise and training of those professionals. This would burden a workforce that is already stretched thin with a new, extra-regulatory set of assessments. Third, if certifiers are asked to do food safety risk assessments, we would likely see food safety-focused questions added to the OSP. Adding questions that go beyond the scope of the organic regulations to the OSP is the exact opposite of the streamlining that the sector has demanded, NOP has promoted (through its common OSP), and certifiers have invested resources in actualizing.

Our system works, in part, because organic certifiers focus on verifying compliance with the organic regulations - and rely on other experts to verify compliance with the regulations in their areas of expertise. Perhaps we need a stronger handshake between organic certification and food safety compliance - much like we built a stronger handshake between organic certification and import verification - but asking organic certifiers to become food safety compliance regulators is neither a sound nor sensible policy outcome.

Ivermectin for Treatment of New World Screwworm - Proposal

We understand that the intent of this proposal is to support organic producers in having a

“complete” toolkit to address pressures and new challenges, and we generally support that goal.

While we do not take a position on specific materials, we urge the Board to take care that any annotation - and particularly one that bypasses the full petition process - is clear enough to enable consistent implementation by certifiers. We flag that the proposal, as written, is unclear with respect to whether (and how) certifiers would be required to verify that ivermectin was used specifically for treatment of New World Screwworm (and not any other purpose). It is also unclear about the impact of ivermectin use on the organic certification of meat from any treated animals. We encourage the Board to put the right guardrails in place to ensure we don’t solve one problem and create many more further in the certification process. We understand that the intent of this proposal is to support organic producers in having a “complete” toolkit to address pressures and new challenges.

Consistency in Organic Seed Use - Discussion Document

Increasing organic seed usage on organic farms is a sector-wide challenge that requires a system-wide solution. ACA is glad to represent the certifier perspective in these discussions - both here at the NOSB meetings, and also through participation in the Organic Trade Association’s seed task force and other sector-wide discussions. SOE has given certifiers additional direction with regard to sharing information to verify compliance with the organic regulations across complicated supply chains. While many certifiers are already applying this to verifying compliance with the commercial availability provisions related to organic seed use, revising NOP Guidance 5029 to clarify this is a worthy goal, and will be part of that system-wide solution. Aligning communications about commercial availability across the system will also be a critical piece of the solution.

Residue Testing for a Global Supply Chain - Proposal

ACA appreciates the expertise the Subcommittee has put into this topic, and your diligent work exploring ways to prevent contaminated and fraudulent products from entering organic supply chains. Residue testing is important to organic certification, as it can provide a way to monitor compliance and discourage mislabeling. An updated and more rigorous testing program will help certifiers verify compliance, deter fraud, and prevent contaminated or fraudulent products from entering organic supply chains. However, such a testing program must also be feasible and aligned with a risk-based approach to process/systems based certification.

1. 5% testing requirement be met through a combination of risk-based and random selection: Organic certifiers have always incorporated risk assessments into their compliance verification activities. Since the implementation of SOE, our community has leaned further into codifying or memorializing this approach, and we are not opposed to this recommendation to codify risk assessment within the mandatory testing requirement. For most certifiers, this will likely not change much; but clarity is important for consistency and for setting expectations.
2. Cost of testing may be passed on in certain situations: While we appreciate the Subcommittee’s consideration of the impact of placing the entire cost of testing on

certifiers, we are not convinced that the language proposed will, in practice, result in lessening that burden. The language proposed allows certifiers to pass on the cost of testing when it is part of a credible complaint or investigation (how is “credible” assessed, and by whom?) AND when contamination is intentional. The burden of proof to meet these prerequisites is so high, that in reality certifiers would only rarely (if at all) be authorized to pass on the cost of testing. The language included pays lip service to the concern, but we are concerned that it does not address it.

3. Public access to results: We share the concerns about public access to results that continue to be raised, including the possibility of misconstruing data, litigation possibilities, and questions of maintenance.
4. Unavoidable residual environmental contamination (UREC): We support the revision of NOP 2613 to clarify the definition of UREC.
5. Downstream notification of buyers: We appreciate the Subcommittee’s consideration of the comments that raised significant concerns in this area in the Spring. While strengthening integrity to create more accountability is an important goal, outstanding issues with residue testing must be addressed before requiring downstream notification. Otherwise, this will turn into a de facto recall mechanism, which is not authorized by or aligned with the purpose of the Organic Foods Production Act. We appreciate the proposal’s focus on using existing tools - such as best practices and fraud prevention plans - to guide information sharing.

Streamlining Certification

We are pleased to share an update on our work to support our certifier members in streamlining their certification processes. This has been a multi-year process, focused first on ways to more broadly and consistently incorporate risk assessment into the certification process. Now, certifiers are also focusing on areas where they can streamline their processes - resulting in continued verification of compliance, reduction of unnecessary burden on organic operations, and the ability to deploy limited certification resources where they can best root out fraud and other dangers to organic integrity.

Our membership has developed best practices for streamlining the application process and the annual update process. These best practices, available to our members, suggest practical solutions that allow certifiers to do their jobs more effectively and efficiently. Certifier interest in this work has been significant, and we’ve seen participation by a wide variety of certifiers (and by professionals across many roles). The work continues, and we look forward to reporting out on additional efforts at future NOSB meetings.

ACA also continues to invest in training - both online and in person - to ensure that organic inspectors and reviewers gain proficiency in critical thinking and risk-based decision making. We are building training resources that meet folks where they are - both geographically as well as in various roles within the certification workforce. These resources are designed to bring the whole community along in proficiency in risk-based decision-making. We offer these trainings in our flagship annual training (held every January); online in our acaDEMY learning platform; and through targeted regional trainings (acaDEMY Live!) that have taken place in New York, Michigan, Massachusetts, and Oregon. We look forward to continuing these efforts in 2027.

Organic Workforce and Community

As this is the final NOSB meeting before the Transition to Organic Partnership Program (TOPP) sunsets, we want to take this opportunity to reflect on the success of that program, and appreciate all of the members of our community who have been part of TOPP's sector-changing work.

First, the teams of experts across the country who have shepherded TOPP from an idea in 2021, to a reality now - connecting hundreds of transitioning organic farmers with mentors, delivering thousands of hours of direct technical assistance to organic producers, organizing over 1,500 events across every state in our nation, and supporting more than 500 operations (and counting) in obtaining organic certification. These dedicated colleagues built innovative farmer-focused transition programs from scratch, leaning in to collaboration with local and regional partners, and ensuring that needed resources reached farmers where they are, across all 50 states and selected territories.

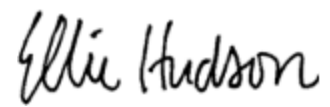
And the work was not only farmer-focused. TOPP supported a variety of certifier- and inspector-focused efforts, including a national curriculum to train entry-level inspectors and reviewers (and associated workforce development efforts to create new pathways to careers in organic certification). ACA is proud to have been involved in mentoring aspiring organic inspectors through multiple fellowship programs aimed at addressing this critical workforce need.

As the TOPP program sunsets in 2026, it is incumbent upon the organic community to ensure that its impact continues. We must do that by building on the programming and investments made over the last five years, continuing to support American organic farmers and those transitioning to organic. We must also do so by ensuring that this dedicated workforce of organic leaders transitions out of their TOPP roles into positions where they can continue to contribute to organic. It would be a travesty for us to allow this brain trust to matriculate outside the organic industry simply because they can't find gainful employment post-TOPP.

Finally, one of the most important and hopefully long-lasting impacts of TOPP is the relationships we have built from local to regional to national in scope, both leading projects and supporting the efforts of others. These relationships have brought folks together across the organic sector, building bridges that can serve our sector for decades to come. We look forward to one of TOPP's legacies being the continued partnership throughout the sector to solve intractable problems and be in community together.

We appreciate the NOSB's work on these topics and look forward to future collaboration and dialogue.

Respectfully submitted,

A handwritten signature in black ink that reads "Ellie Hudson". The script is fluid and cursive, with the first letters of both words being capitalized and prominent.

Ellie Hudson
ACA Executive Director

