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National Organic Standards Board
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1400 Independence Avenue, SW
Room 4008 - So., Ag Stop 0268
Washington, DC 20250-0268

Comments on: AMS-TM-08-0021-0001

**National Organic Standards Board (NOSB)
Certification, Accreditation, and Compliance Committee
Guidance Materials pertaining to Certifying Operations with
Multiple Production Sites and Facilities
May, 2008**

The Accredited Certifiers Association (ACA), representing 40 NOP accredited certification agencies, would like to thank the Certification, Accreditation & Compliance Committee for the opportunity to comment on the Guidance Materials pertaining to Certifying Operations with Multiple Production Sites and Facilities.

ACA did submit comments on the November 2007 CACC Discussion Document for Certifying Operations with Multiple Production sites and facilities. Due to the comment period of only 30 days, ACA was not able to address all of the 13 questions.

VI. Pending Issues

The CACC requested comment on pending issues. Below are the comments from ACA.

1. Should group certification apply to retailers, handlers, processors and/or restaurants if they meet this stringent criteria?

The majority of ACA members feel that group certification should apply to only grower groups, and should not be extended to retailers, handlers, processors and/or restaurants.

2. Should it be limited to only small farmers (holders)? What defines small?

ACA suggests participation in grower groups only be available to growers producing less than \$5,000 US in organic sales. This sales level is supported in OFPA as a threshold for

exemption from certification, so allowing a slightly different protocol for inspection might be legally supportable.

3. Does a process of random external inspection levels based on risk criteria provide enough oversight of individual locations or is there a need to guarantee all locations are externally inspected at some minimum frequency?

A minimum frequency for inspection should be established, however, all high risk operations should be inspected annually, with the lower risk operations subject to random inspections.

4. Should the qualification and inspection criteria be different for each sector of the organic industry eligible to apply for multi-site certification? If so, what are the specific criteria that are not included in this document?

The majority of ACA members feel that group certification should apply to only grower groups, and should not be extended to retailers, handlers, processors and/or restaurants.

5. What is the advantage of including other sectors in the multi-site model? Disadvantages?

ACA members feel that not conducting an annual inspection of retailers, handlers, processors and/or restaurants will result in a reduction of integrity in the National Organic Program.

6. - 8. Not addressed by ACA.

9. Would it be worth pursuing the development of the multi-site model for other sectors separately from grower groups?

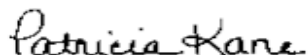
The majority of ACA members do not support the expansion of the multi-site certification process to other sectors.

- 10.- 12. Not addressed by ACA.

13. If multi-site is included in all sectors, what economic issues should be evaluated to make sure it is fair for large and small operations?

The majority of ACA members feel that group certification should apply to only grower groups, and should not be extended to retailers, handlers, processors and/or restaurants.

Sincerely,



Patricia Kane
ACA Coordinator