



Accredited Certifiers Association, Inc.

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December 13, 2010

Toni Strother
Agricultural Marketing Specialist
National Organic Program
USDA-AMS-NOP
1400 Independence Ave., SW.
Room 2646 So., Ag Stop 0268
Washington, DC 20250-0268

**RE: AMS-NOP-10-0048; NOP-10-05
Comments on NOP Draft Guidance Document Commingling and Contamination
Prevention in Organic Production and Handling**

Dear Ms. Strother:

Thank you for the opportunity to provide comments to the National Organic Program on the NOP Draft Guidance Documents published in October 2010. We appreciate the process of the NOP issuing "draft" guidance documents and offering the opportunity for comment from the organic community.

The Accredited Certifiers Association is a nonprofit educational association comprised of USDA accredited certification agencies and additional supporting members. We currently have 40 accredited agencies in our membership.

ACA supports the Commingling and Contamination Prevention Guidance document. We appreciate that the National Organic Program has identified specific areas, such as the identification of risks and preventive measures taken by the operator, to be included in the organic system plan. Many of our members currently include this information in their organic system plans. The identification of possible preventive practices is also helpful to ACA's, operators and inspectors.

ACA sincerely thanks the National Organic Program for the efforts to clarify various portions of the Rule and for the opportunity to provide comments.

Sincerely,

Patricia Kane
ACA Coordinator