



May 4, 2026

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP

Docket: AMS-NOP-25-0034

**RE: Certification, Accreditation, and Compliance Subcommittee
Discussion Document: eCommerce Organic Labeling Requirements**

Dear Ms. Arsenault:

Thank you for this opportunity to provide feedback to the Certification, Accreditation, and Compliance Subcommittee on its eCommerce Organic Labeling Requirements proposal. The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, material input providers, and others. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

OTA appreciates the Subcommittee's consideration of the comments received in response to the discussion document put forward in Fall 2025, and its acknowledgement that the U.S. Food and Drug Administration (FDA) has yet to rule on its determination of what is considered a label in digital environments and what is required in these formats. We believe organic should not get out ahead of FDA when determining label guidelines or requirements in a digital market. However, we believe consumers reasonably expect to find the same or similar labeling information no matter where they shop.

The recommendation that NOP issue guidance outlining best practices for displaying the USDA organic seal, a "Certified organic by * * *" statement where possible, and images of a product label as it might be seen on a store shelf recognizes the importance of consistency in labeling across physical and digital platforms. Additionally, we appreciate the suggestion of timely updates across platforms with the acknowledgement in the discussion that real time, precise mirroring of labels may not always be logistically possible. And while guidance may not have the enforcement teeth of a regulatory change, it presents a meaningful message to stakeholders of the importance of best practices in labeling while allowing time for broader FDA guidance on eCommerce food labeling to be finalized.

On behalf of our members across the supply chain and the country, OTA thanks the National Organic Standards Board for the opportunity to comment, and for your commitment to furthering organic agriculture.

Respectfully submitted,



**ORGANIC
TRADE
ASSOCIATION**

Scott Rice
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cc: Tom Chapman
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