

September 29, 2022

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

Docket: AMS-NOP-22-0042

RE: CAC Subcommittee – Proposal on NOP Risk Mitigation Table

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the National Organic Standards Board (NOSB) Compliance, Accreditation & Certification Subcommittee’s Proposal on the National Organic Program (NOP) Risk Mitigation Table.

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, representing organic businesses across 50 states. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

Strong oversight of NOP and accredited certifiers is critical to ensure impartiality and safeguard against conflicts of interest. The NOP Risk Mitigation Table¹ was developed by NOP to document the ways it identifies and mitigates potential conflicts of interest to safeguard impartiality in the delivery of services and oversight over accredited certifiers. The purpose of developing the table is for NOP to maintain compliance under ISO/IEC 17011:2017 conformity assessment requirements for accreditation bodies.

OTA supports the subcommittee’s proposal for revising the NOP Risk Mitigation Table. In particular, we appreciate that the proposal reflects items from OTA’s Spring 2022 comments including:

- Addressing potential conflicts or risks to impartiality that may arise from accrediting certifiers that operate within a larger governmental organization, i.e. within State Departments of Agriculture or State Organic Programs.
- Broadening the assessment of possible risks under “Favoritism, bias or discrimination” and “Undue Influence.”

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,



Johanna Mirenda
Farm Policy Director
Organic Trade Association

cc: Tom Chapman
CEO
Organic Trade Association

¹ <https://www.ams.usda.gov/sites/default/files/media/NOPMemotoNOSBRiskMitigationCombined.pdf>