

**We are a large grocery chain that markets a line of organic products under an organic brand label. The brand is labeled as “distributed by XYZ Foods, Inc.” The grocery chain owns XYZ Foods, Inc., Ltd. The majority of the items composing the product line are manufactured and packaged for us by other companies. We currently maintain an “Organic Handler (Trader) certification through a Certifying Agent (CA). Our policy is to use the CA’s logo exclusively on all labels, which allows some flexibility in sourcing and simplifies the actual label making process. In order to meet the requirements for Handler certification, we maintain certificates and summaries for all suppliers. Each manufacturer is inspected and certified by an NOP approved CA. Another CA has recently informed us that NOP has announced that this policy would be changing and that all labels will be required to have the logo of the original CA. In this case, we would be required to use the logo of the CA that informed us of this change instead of our standard CA logo. I realize that agricultural group certifications, specifically coffee, were being reviewed to mandate that each farm be certified, but I was not aware of additional changes to other certifications. Can you please provide direction in this case?**

NOP will provide guidance to interested parties and accredited certifying agents on this issue in the near future. Excluded and exempted entities may voluntarily seek certification under the NOP regulations, and all parties must assure full accountability and traceability in the marketing chain is maintained, so that organic integrity is assured and no compromise of the organic label or product occurs.

[e-CFR](#)