PUBLIC SUBMISSION

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Docket: AMS-NOP-23-0052

National Organic Program: Notice of Intent to Extend and Revise a Previously Approved Information

Collection (2024)

Comment On: AMS-NOP-23-0052-0001

National Organic Program: Notice of Intent to Extend and Revise a Previously Approved Information

Collection (2024)

Document: AMS-NOP-23-0052-0003

Comment from Corker, Bruce

Submitter Information

Name: Bruce Corker

Address:

Holualoa, HI,

General Comment

My comment addresses what I believe is an undue burden on small farm operations from current organic certification procedures. I have a small 4 acre coffee and avocado farm on Hawaii Island and each year go through a long, burdensome and expensive process of applying for certification and going through an inspection procedure. The significant costs of \$1200+ for organic certification for small farms is excessive. The USDA cost share helps with reimbursement of some of the costs, but the economic and time burdens of the annual certification process are still substantial. MY SUGGESTION--That for small farm operations, the certification process be changed to once every three years, with submission of a written statement of continued compliance by the certified small farm in each of the following two years. The USDA should be encouraging small farms to be certified as organic, rather than imposing significant burdens.