

PUBLIC SUBMISSION

As of: September 12, 2013 Received: September 10, 2013 Status: Posted Posted: September 12, 2013 Tracking No. 1jx-86nu-jd3h Comments Due: August 27, 2013 Submission Type: Web

Docket: AMS-NOP-13-0051

National Organic Program: Request for an Extension of a Currently Approved Information Collection

Comment On: AMS-NOP-13-0051-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: National Organic Program

Document: AMS-NOP-13-0051-0034

Van Hook, Chris

Submitter Information

Name: Chris Van Hook

Address:

Crescent City, 95531

General Comment

I would encourage the continued development of the Sound and sensible program. We need to remember that the NOP is a voluntary program that if it becomes too burdensome, farmers and handlers will drop out and develop other certification programs to bolster consumer confidence. Specifically:

- 1). Allow inspectors to pick up new information on the inspection.
- 2). Not require more information detail than is required to assure organic integrity.
- 3). Remember that the more time on paperwork is time away from farming.

For Certifiers:

- 1). Have audit fees and requirements reflex the size of the certification company. Larger ones might take longer, but smaller ones should take less time and cost less.
- 2). Be clear well ahead of the deadline what format the USDA NOP wants information in and minimize the number of changes of formats required.
- 3). Be able to attend the yearly meetings by video cam to reduce the high cost of travel during the winter months. The meetings are always held in nice areas but difficult and expensive to get to. They are not vacations so why have them all in "destination" spots. It would be much cheaper and easier to get to if they were held in Las Vegas (for example). Flights are cheap, rooms and food is cheap and we can all get back to the airport to go home. Plus it is much more centrally located. We do not all need to meet in a destination location that does not have a direct flight and is at the edge of the continental US.
- 4). I think a lot of these issues are being addressed now in the "sound and sensible" discussion which is good.