

PUBLIC SUBMISSION

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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-13-0051-0044

Unger, Beth

Submitter Information

Name: Beth Unger

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La Farge, WI, 54639

General Comment

Attached are comments for AMS-NOP-13-0051

Attachments

Sound and Sensible comment



August 27, 2013

AMS-NOP-13-0051

Toni Strother

USDA-AMS-NOP

Posted to Regulations.gov

CROPP Cooperative respectfully submits the following comments pertaining to the docket noted above.

CROPP is the nation's largest organic independent and farmer owned cooperative. Organized in 1988, it represents 1,834 farmers in 35 states and 3 Canadian provinces, and achieved \$860 million in 2012 sales. Focused on its founding mission of saving family farms through organic farming, Organic Valley produces a variety of organic foods, including organic milk, soy, cheese, butter, spreads, creams, eggs, produce and juice, which are sold in supermarkets, natural foods stores and food cooperatives nationwide. With its regional model, milk is produced, bottled and distributed right in the region where it is farmed to ensure fewer miles from farm to table and to support our local economies. The same farmers who produce for Organic Valley also produce a full range of delicious organic meat under the Organic Prairie label.

We appreciate the opportunity to comment on the paperwork burden for producers and handlers. We are in a unique position to respond due to the complexity of our business. We reached out to our farmer-owners and asked that they also provide public comment for this docket. In general, our farmers estimate they spend about 50 hours on the annual updates for the organic system plan. This does not include the daily entries for changing feed rations and pasture records. Also not included is time spent gathering records for the inspection, which could be an additional 50 hours for crops and livestock. Some complained about the layout of the OSP stating that one size form does not fit all operations; the forms contain many questions that may not apply to the operation.

Based on a number of phone conversations with our members, the number one complaint we heard is the level of documentation necessary to show compliance to the pasture rule. We have many small family farms that are clearly pasture based before there was a pasture rule. Now they are in a position to prove it with paperwork although it is evident they are pasture based. Additionally the cost of inspection for livestock has increased due to the pasture rule. Farming is a low margin business; we are looking forward to the Sound and Sensible initiative evaluating the amount of documentation and inspection time.

CROPP Cooperative maintains four organic certificates; one for our properties (Crops), one for marketing our Organic Prairie products, one for marketing the Organic Valley products, and one for our cut and wrap cheese facility. Our field manager for the organic property estimates approximately a minimum of 50 hours per year to complete required paperwork and updates. For the marketing and handling organic certificates, we estimate one full time position to keep our certificates up to date including new label submissions, formula changes, commercial availability searches, and co-processing plant changes. This does not include the staff time to



ensure organic integrity from farm to package by maintaining current organic certificates for all of our farmer-owners, co-processing facilities, and ingredients.

Thank you for the opportunity to respond to the questions put forth on this Federal Register Notice.

Sincerely,

Beth Unger
Certification Manager
CROPP Cooperative