

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-13-0051-0050

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General Comment

I am a contract inspector that works for 7 to 15 certifying bodies to complete inspection for them.

1. In the contracts that I sign I am required to do a complete inspection and that says nothing about how long I am to be there. For the past 5 years I have developed the following guidelines that I use for scheduling inspections; Farms with about 500 acres or less 4 hours, Farms up to 1000 acres 6 hours, Farms over 1000 acres 8 hours. A livestock operation with 50- 100 animals 6 hours. Livestock with more than 100 ruminants 8 hours. Livestock with non-ruminant animals 6 hours. Processors are based on complexity of the operation. I allow 2 days for a complex processor that is large and 4-8 hours for a small processor.

I stay at the operation until the inspection is completed. If it takes less than this I will leave. These are the guidelines that I use to set my schedule so that there is enough time to complete the inspections in a complete fashion.

The reports take about three hours to complete with enough comments so that a reviewer understands the observations that were made and how they impact the NOP.