

# 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-13-0051-0052

Conyac, Jeremy

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## Submitter Information

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## General Comment

I am an organic inspector. Your question was "How long does it take you to:

Prepare and submit your report to a certifying agent following an on-site inspection? "

This is very variable based on three factors, including they report (length, organization and detail), the size of the operation inspected, and the information and records provided by the inspected entity. In general the time spent on a report is a little less than 75% of the time spent on site.

Some quick examples:

200 head dairy - 5 hour inspect; 2.5 hour report writing

1000 head dairy - 8 hours; 4.5 hour report writing

100 acre orchard - 2 hour inspect; 1 hour report writing

20 acre market garden - 3 hour inspect; 2 hour report writing

However, if the operator has very poor records, spend time running to the fax machine and phone, etc, then the simple inspection may take an additional 50% time to the inspection and add the same or more to the report writing.