

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-13-0051-0070

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General Comment

It takes us three days to do our paperwork for renewing our certification and a couple hours to fill out the pasture info. We are a small dairy operation but there is so much redundancy built into the forms. We fill out the number of cattle we have several times on different forms. We despise paperwork and then you make us use faulty formulas for figuring pasture requirements. We then realize that this is all BS! We do not like spending time we will never get back putting junk in to the system to produce junk figures just so you can see we can do math. The forms divide the cattle groups differently than we do on the farm so we have to make fictitious cattle groups then you wonder why the numbers don't always total the same. If you would let us do the math as it is on the paddocks we are using all would be less stressful. We end up calling our certifier at least three times each year to clarify what we have to do to make it make sense to you. Another redundant form is input log and ingredient logs saying nearly the same thing. As far as pasture requirements go why not forget leaving farmers use other feed during pasture season?