

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-13-0051-0017

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General Comment

As an organic handler/processor with sales of organic product less than 200 metric ton and revenue of less \$750,000 I would estimate our annual time requirements based upon activity as follows:

- maintain organic handling, production, sales records: 200 hours
- preparation, follow up, & participation in annual inspection: 20 hours
- maintaining knowledge of organic regulations, training, etc.: 40 hours

Unrelated to my processing activities, we spend approximately 80-120 hours per year providing documentation on our non-certified products that are purchased and used by certified organic operations. An example would be documentation regarding fertilizer purchased used by an organic dairy, even though the fertilizer itself is not certified organic by Midwestern BioAg, Inc.