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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-13-0051-0043

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Submitter Information

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General Comment

See attached file(s)

Attachments

Time Spent on Recordkeeping - PCO Public Comment



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August 27, 2013

Toni Strother
Agricultural Marketing Specialist
National Organic Program
USDA-AMS-NOP
Room 2646-So., Ag Stop 0268
1400 Independence Ave., SW.
Washington, DC 20250-0268

Re: AMS-NOP-13-0051;NOP-13-02

Comments on NOP Reporting and Recordkeeping Requirements

Dear Ms. Strother,

Pennsylvania Certified Organic (PCO) welcomes the opportunity to provide comments to the National Organic Program (NOP) in response to the information request from organic stakeholders regarding the time spent on reporting and recordkeeping requirements. PCO is an NOP-accredited certifying agent that certifies more than 700 operations, including around 165 crops operations, 385 livestock operations, 120 processor/handler operations and various combinations of the three categories.

PCO appreciates the NOP's request for comment on the amount of time that certifiers, inspectors, and operators spend on recordkeeping. Recordkeeping is the basis for a transparent system, but it must be balanced with practical expectations of the stakeholders. PCO supports this collection of information and encourages the NOP to continue their work for the *Sound and Sensible* initiative.

Certification

PCO employs 4 fulltime certification specialists to do the initial review of certification documents and participate in certification review and decision-making. In total, PCO staff spends approximately 2,000 hours performing initial reviews of operations seeking continued certification, which amounts to approximately 3 hours per individual initial review. Initial reviews for these renewing clients are made more efficient by the use of

Assuring the Integrity of Organic Products in the Marketplace

shortened “update” forms, where clients only report on *new* information or other changes to their organic system plan.

For new applicants, the time per individual initial review is higher than a renewing client, at more than 4 hours per review. The additional time to review new applications is typically due to incomplete applications and requests for additional information.

For certification reviews following an inspection of either a new or renewing client, PCO staff spends 2,200 hours in total, which is about 3.25 hours per individual certification review.

PCO also employs 2 staff members to perform reviews of input materials. On average, each material review takes 1 hour and 20 minutes. Over the course of a certification cycle, PCO will review 1,000 materials, totaling 1,300 hours spent on material review annually. This time mostly involves collecting information from various manufacturers of input materials, obtaining supporting documentation for individual ingredients, and filing the information to be readily auditable.

Inspection

The NOP estimates that half of a certifying agent’s inspectors are employees and half are independent contractors. PCO uses 2 employee inspectors and 11 individual contractors to perform more than 700 inspections annually. The employee inspectors perform approximately one third of the total inspections.

PCO utilizes both hard copy and electronic inspection checklists for inspectors to use during the on-site inspection. Employee inspectors use electronic checklists and complete the majority of the report while on-site and then spend between 15 minutes to 1 hour editing and submitting the report to PCO. Contracted inspectors have been encouraged to submit their own comments to the NOP describing their own process with PCO and other certifiers.

Accreditation

To prepare the most recent annual report for PCO’s accreditation renewal, PCO spent 10 hours collecting and compiling the required information. This process was made more efficient than previous years due to the NOP’s new requirement for certifiers to only report *changes* to information and processes instead of reporting documentation for every requirement listed on the annual report checklist. Also, the NOP no longer requires certifiers to re-submit a list of certified operations with the report, since certifiers are already required to submit this list by January 2nd of each year. PCO commends the NOP for not requiring duplicated information submissions.

Certified Operations

PCO certified operators have been encouraged to submit their own comments to the NOP to describe how long it takes them to maintain required records and update organic system plans. PCO has made efforts to streamline this process. For example, PCO now offers the option for operators to complete their organic system plan updates over the phone instead of filling out the paperwork by hand and mailing it in. A few dozen operators took advantage of this option this year and saved a great deal of time. In some cases, operators cut their time in half, saving up to 3 or 4 hours. We expect this option to gain in popularity over the coming years.

Burden of Information Collection

The NOP estimates that it will take 1.5 hours for each stakeholder to prepare the information requested by this federal register notice. In fact, it took PCO over 3 hours to compile the data presented in this comment. The time will be well spent if the NOP uses the information provided to propel its *Sound and Sensible* initiative towards more efficient processes and streamlined recordkeeping.

PCO appreciates the opportunity to provide comments and thanks the NOP for its careful consideration.

Thank you,



Johanna Mirenda
Policy Director