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Kelly, Allyson

Submitter Information

Name: Allyson Kelly
Address:
1111 Marcus Avenue
Lake Success, NY, 11426
Email: allyson.kelly@hain.com

General Comment

See attached comments.

Attachments

Hain Celestial Sound and Sensible Comments

August 26, 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

The 'Sound and Sensible' initiative involves identifying and removing barriers to certification, streamlining the certification process, focusing enforcement, and working with processors to correct small issues before they become larger ones. The overall goal of this new initiative is to make organic certification accessible, attainable, and affordable for all operations.

As one of the largest organic handlers in the world, we maintain the documentation required for over 1,000 organic products and thousands of organic ingredients. We also maintain and renew annually the organic certifications for more than 20 manufacturing facilities and three corporate handler certificates. The amount of documentation that this requires is staggering and enormously time-consuming.

We encounter numerous difficulties that are relevant to the Sound and Sensible initiative. For example, it is a challenge to find acceptable cleansers, sanitizers, or pest control materials in accordance with the National List. OMRI is not always reflective of the National List- e.g. Pyrethrum is on OMRI but is considered a synthetic pest control material and therefore requires additional documentation in order to be used in a facility that manufactures organic goods. A definitive listing of allowed and suggested materials compiled in one dedicated list would be helpful.

We are faced with constantly changing renewal forms and are often asked to complete that year's (or that certifier's) revised renewal application form, organic compliance plan, addendum materials list, warehouse affidavit, IPP/formulation sheet, or equivalency document. Standardized forms would be extremely helpful.

Some certifiers do not accept the certifications of other certifiers. For example, if a facility is certified by Certifier A, but we list Certifier B on the label for our corporate certificate, Certifier B should require two things, a copy of the facility's Certifier A certificate plus a copy of the label. However, sometimes Certifier B will insist on a copy of the product formula, even if we do not own the formula, and they insist that the formula be sent to them on their own formula template. Certifier B also asks for detailed

documentation on individual ingredients used in the formula. All these things have already been evaluated by Certifier A. This creates a lot of extra work, and it is unnecessary.

Organic inspectors require hard copies of all documentation to be presented to them on inspection day. This takes valuable time and resources to print hundreds or thousands of pages. It would be much more efficient to provide the information electronically. In many cases where the inspector requests certain documents on site, he or she does not send them to the certifier along with the inspection report. We are then asked via non-compliance letter or customer service advisement to provide dozens of specifications or other documents within an allotted time frame. This is double the work and can be a drain on time and resources.

The amount of documentation involved in organic certifications is enormous, even for companies smaller than us. For nonorganic ingredients it is challenging to get the suppliers to fill out all of the forms required. The ACAs then require that we go back to these suppliers every 12 to 18 months and ask them to fill out the forms again, even if there were no changes. This should not be necessary. We would also like to suggest that annual inspections not be required for operations that had minimal or no non-compliances at their previous inspection. Perhaps renewals for commendable facilities could be done every two years instead. This would require a change in the regulations, but this "incentive program" could encourage facilities to better manage their organic programs from the start.

Finally, since there are different types of certified operations- e.g. Farm, Trader, Handler, Manufacturer, Distributor- it is important that inspectors have prior knowledge of the type of facility that they will be auditing. A manufacturing facility and a distributor's corporate offices are not going to be able to perform the same type/form of audit tracking or mass balance exercises. Inspectors that are only familiar with auditing manufacturing facilities or farms will often ask a distributor to track individual ingredients back to a manufacturing facility that the distributor does not even own. There are systems in place to do this, such as a product recall situation, but this is outside the scope of a distributor audit.

We understand that the National Organic Program is fairly young and we are all striving to improve and streamline the processes for organic certification. We thank the NOP and the many organizations and individuals that are contributing to this effort. Thank you for considering our comments.

Sincerely,

Allyson Kelly
Organic Program Manager

Zareb Herman
Regulatory Affairs Director

1111 Marcus Avenue, Lake Success, NY 11042, Phone (516) 587-5000
www.hain-celestial.com