## **PUBLIC SUBMISSION**

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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

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Twigg-Smith, Desmond: Holualoa Kona Coffee Co.

## **Submitter Information**

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Organization: Holualoa Kona Coffee Co.

## **General Comment**

Hello there --- we have been completely organic since 1999, certified since 2003 and have not substantially changed our operation in that time, with the exception of adding 8 more acres of production.

The paperwork requirements of renewing our certified status each year has grown considerably in that time from four or five hours at first to more than 20 hours this year. This does not include all the time spent documenting procedures and maintaining logs etc. throughout the year. If we added up all that time it would be truly a daunting undertaking had we know from when we were first seeking certification.

Every year the regulations are tightened a little more and more things are scrutinized and the paperwork burden grows and grows even though we have always passed recertification inspection with good reports since being certified 10 years ago .

This is a sure sign of a bureaucracy ensuring its justification of existence over serving the needs of the people it was put in place to regulate.

Wouldn't it be better to get more farms certified and for the government agency to spend its tax dollars on promoting organic products so that farmers could get higher prices for the higher costs of organic farming instead of creating an onerous time wasting paperwork burden?