

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

Document: AMS-NOP-13-0051-0019

Klug, Cathlene: Klug Orchards / Green Organics

Submitter Information

Name: Cathlene B Klug

Address:

8533 Pokagon Rd

Berrien Center, MI, 49102

Email: klugorchards@gmail.com

Submitter's Representative: Ecocert/ ICO Organic Certification

Organization: Klug Orchards / Green Organics

Government Agency Type: Federal

General Comment

Our seasonal Michigan Fruit and Veg Organic Farm crops on over 100 acres we spend aprox 600 hours on documentation, seed search, records specifically for organic compliance we would not otherwise perform . Certification is aprox \$1,000 fees and using our organic methods (ie vs roundup herbicide etc) initial costs are easily over \$20,000 more. Some crops with less harvestable product or volume additionally cost another \$3,000. The premium we can get for these in our area vs. conventional is not equal to the cost and energy spend for the difference, even vs larger Organic California corp flooding our mkt w shipped in Strawberries cheaper in our 3 wk season. We do know our Organic grown uses no petroleum fertilizers, is the simplest purest of substances for body digestion to recovering patients, and soil / microbial life dimension is still being shown as beneficial for future sustainability, also. Thank You.