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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-13-0051-0057
Beach, Anda

Submitter Information

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General Comment

See attached file(s)

Attachments

Comments AMS NOP-13-0051 12Aug13

Neudorff North America · Unit II · 6782 Veyaness Road · V8M 2C2 · Saanichton B.C.

August 12, 2013

Toni Strother
Agricultural Marketing Service
National Organic Program AMS/USDA
1400 Independence Ave, S.W.
Room 2646-So. Ag Stop 0268
Washington D.C.
20250-0268

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

Dear Ms. Strother,

Neudorff is a registrant of EPA registered pesticides, many of which are approved inputs for organic production. We have submitted petitions to the USDA to have materials added to the National List, and have also commented on numerous petitions. As such, we are an 'interested party' and these comments are pertaining to the time and cost burden of preparing a petition.

The estimate of 30 hours to prepare a complete petition is an underestimation. It typically takes us hundreds of hours to prepare a petition, including compiling information and data from peer-reviewed literature, EPA documents and extension agent publications. This information is necessary to assess the potential for human health effects, non-target effects and environmental fate, and comparisons to existing methods/materials, and may take several full work weeks to research and collect. Once the supporting materials have been gathered, it typically takes at least one full work week (40 hours) to amass the information into a clear and concise formal written document.

If comparisons to existing allowed materials are not readily available, it may be necessary for the petitioner to produce the data themselves through lab and/or field efficacy trials. If field trials are able to be completed internally, the time required to plan, set up, carry out, assess, and write up a report for a field trial can be cumbersome. Generally this would require at least six to eight hours for a very basic test, and can be in excess of 30 to 40 hours for more involved testing. If field trials are done in collaboration with third-party researchers, the time investment is lower on the part of the petitioner, but the monetary costs can range from $2000 to $10,000 or more for a single trial. As a single trial is not sufficient to confirm efficacy, total costs for research trials can be $6,000 to $30,000 or more.

Additionally showing there is grower need for a material is necessary for the NOSB to seriously consider adding new materials to the National List, and garnering written grower support is time consuming. Numerous stakeholders are contacted via telephone, email, written correspondence, and/or in person to request support for the petitioned substance or to demonstrate a need for such a material. They then may show support by submitting written comments to the NOSB or attending a meeting in person with oral comments.

Travel time and expense to attend the NOSB meeting(s) and support the petition should also be accounted for in your estimates. Each meeting requires travel of one or several of our personnel from various locations in North America (e.g. Canada, California, D.C.) to attend the NOSB meeting in a location that changes each year. Depending on the location, it may take up to a full day of travel in each direction. Monetary costs include round trip flights, local transport, hotel, and meals. Usually attendees spend one to three days at the NOSB meeting, costing $2500 or more per person. Oral comments require time to prepare and review in advance of the meeting, plus the time to attend the comment period and present to the board.

We appreciate being able to give input into the development of the organic standards. Thank you for taking the time to consider the time burden on participants in the process.

Regards,

Anda Beach