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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General Comment

I am one of the inspectors out there that often spends more time writing reports than the time inspecting. One of the reasons for this is that the organic certification Plan system is set up by most certifiers to be more about communications between certifier and clients and less about compliance: and very often there is a breakdown in communications. So the inspector needs to make clarifications on both ends- the client end and the certifier end, so that communications can better continue. This is different than what is found with State and Federal Agencies and Food Safety inspections, where there is just a simple compliance score sheet with yes and no and such 'n such is the issue, with no added detail.

A lot of the certification organizations have just a few people coordinating hundreds of clients, and this is probably one of the reasons for the prevalent communication breakdowns. Because it seems to be more affordable for the certifiers to send out inspectors who are not on the payroll and are not getting health insurance to take the time to explain the situation on site and in the reports than it is to hire more capable review people.

The other thing is some of the certifiers have very complicated inspection report formats- sometimes with over 170 items for an inspector to check for one operation. One of the reasons this is done is that many of the certifiers have inspectors that are not very thorough, so the certifier feels that they need to list each item that needs to be covered so the inspector will not forget to cover each item. And with these excessively long check forms, if an inspector is good enough to find issues, each check with issues requires a narrative explanation, which can take a lot of time. I have suggested to some of the certifiers that they should limit their check boxes to maybe at most 5 to 8 general items each section, such as for the Sanitation Section there would only be 5 to 8 areas to be checked, and then nothing would be stated by the inspector until the end of that section. Therefore each negative check item would not require a comment, but the comments would be saved for the end of each

section.

lastly, some certifiers are asking their inspectors to check and write the inspection reports during the inspection for the sake of efficiency. I have followed a some very good inspectors who do this who have missed a lot of important and very obvious compliance issues because they are too busy writing reports when they should be busy inspecting.