

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 applaud the effort to better understand the paperwork burden created by organic certification. I think there is belief that it is completing the OSP or the overall application that is the burden, but as a diversified vegetable grower, that is not the case. The burden is in keeping track of our daily activities....planting seeds, transplanting vegetables, adding amendments, tillage logs, pest/weed logs, etc. Unlike grain growers, vegetables growers do not simply work and amend the land once or twice a season. Instead it is a daily event as we plant successions. Keeping track of all of this while we're trying to get work done is really frustrating. Every year it seems our inspector wants to see more and more records regarding every component of the OSP (equipment cleaning logs, weed pressure, pest pressure, tillage, amendments). These are all things that I think are secondary in the overall picture of organics, and I think they could be removed so that what paperwork remains is only the crucial items.