

PUBLIC SUBMISSION

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Docket: AMS-NOP-13-0051

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-13-0051-0014

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General Comment

The format used by my certification agency is burdensome in order to meet the NOP standards and it takes HOURS to wade through it and bypass the irrelevant portions.

My main time-consuming activity that's beyond reasonable is the research to determine what materials are compliant and used in what fashion. For example, the OMRI listing is not easy to search and there is no other comprehensive listing. Try to find, for example, if copper azole surface treatment (not pressure treatment) of wood for fenceposts is prohibited or permitted and if prohibited, at what distance from the nearest tree that produces a a certified organic fruit. And how is that distance measured?