

# 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

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Eastman, Ashleigh: Lundberg Family Farms

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## Submitter Information

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## General Comment

Processor:

-To update our Organic System Plan for a new product there is approximately 3 weeks of communication between the processor and suppliers to obtain the required supplier documentation. When a product is going to be exported to Canada, there is typically an additional 2 weeks of communication between the processor and supplier, as well as the supplier and their supplier to obtain the required documentation needed to meet the Canadian Equivalency agreement. Once all supplier documents have been collected, it takes about 30 minutes to 1 hour per product for the processor to compile and prepare all of the required documents for certification and submit them via email to the certifier. Once submitted to the certifier, there is a 7-21 day turnaround time, depending on the request, before a response is received. Certifier turnaround time can be expedited to 2-5 days, but the processor must pay an additional rush fee per item.

-Obtaining current organic certificates from suppliers throughout the year can take the processor approximately 8 hours. However, CCOF has created a new supplier management portal that allows the processor to download copies of organic certificates for any CCOF certified handler or grower. This has dramatically decreased the time it takes to obtain current certificates for those suppliers who are CCOF certified. With the supplier management portal, it only takes a few minutes to obtain current certificates.

-There is a push from our certifier to convert our Organic System Plan into an electronic version for quicker review. The conversion of the Organic System Plan will take the processor at least 15 hours to complete as it is currently over 300 pages in length.

-Prior to inspection, a team of processor employees spend 2-3 days ensuring that our Organic System Plan is up to date.

-For an item that will be used in organic products but is not commercially available, the processor must go to all lengths to ensure it is not commercially available. The process of researching availability can take 1-3 days.

Farmer:

-One farmer with two fields estimates their time to update their Organic System Plan to be about 10 hours per year. Approximately 5 hours are spent collecting the necessary documentation prior to inspection and approximately 5 hours collecting various documents including clean out logs and vendor information.