

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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Submitter Information

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General Comment

See attached.

Attachments

Binder1

8/20/13

To the (NOP)

I thought I would submit a few comments on the paperwork that we have to do each year too be certified Organic. As each year goes by I feel that the paperwork for the crops have been getting easier, some times its hard to keep in mind what year you're working on when you're asked about last years crop then you have to put down next years crop that hasn't been planted. I ~~wonder~~ wonder why do we need to keep track of machinery that we buy and sell?

But what burns me up the most is this stupid pasture rule that Mr. Matthews dreamed up. Has this man ever shipped milk? Has he and the others that dreamed this up ever had to grow crops + harvest them for feed in the winter? You will never prove to me this new rule is needed. I'm a firm believer in pasture but the new rule has variables, such as climate, weather. Why do we have to measure intake of a cow? How accurate is this? I really feel that this is group punishment

from the big farms that didn't
comply with the previous rule, and
the certifying agents and inspectors
not doing their jobs,

It's very frustrating trying to figure
dry matter intake and then try too
be accurate, It's all a guessing game.
My suggestion would be eliminate this
pasture rule, and the dry-matter intake
foolishness, then send inspectors out
that have been or are farmers and
know what to look for. That would
cut down a lot of paper work.
Our farm has been certified organic
we have 100% organic feed & pasture
why isn't this sufficient? We need
common ~~sense~~ sense.

Phillip McPittroff