

# 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-13-0051-0042

OConnor, Anne

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## Submitter Information

**Name:** Anne OConnor

**Address:**

P.O. Box 821

Viroqua, WI, 54665

**Email:** aoconnor@mosaorganic.org

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## General Comment

MOSA, the second-largest certification agency in the country, is submitting the results of the Time Documentation Survey that we've conducted with our clients, our inspectors, and our certification specialists. We appreciate the National Organic Program's interest in the time burden for various stakeholders in the organic program. We also appreciate the opportunity to share the research we've compiled..

Please contact Anne O'Connor, Communications Manager with any questions at 608-637-2526 (office).

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## Attachments

Certification summary

Summary for inspector data

Summary for Associate time burden data

Final documentation survey August 2013

MOSA Documentation Burden Survey 2013  
Certification specialists

**Question: How much time do reviewers spend on initial review of an applicant file?**

The answer varies based on the complexity and scopes of the operation.

1. New producers: 0.5 to 4 hours depending on new products requested, # of OSPs, clarity of maps and fields histories, number of fields, transition dates, livestock, reviewing past conversations with the producer, more information needed (7% of our files resulted in MIN letters)
2. New handlers: number of product profiles is the largest determinant (complexity of file, private labels, etc..) 1 hour to multiple days
3. Update producers: 15 minutes to 4 hours (with our new easy OSP and postcard program- 19% were postcards)
4. Update handlers: 1 hour to multiple days

**We expand our answer to also include the following information about final review.**

Also noting that if additional information is needed to assess compliance or noncompliances that were found, this range would be different.

1. New producer: 1 hour to 10 hours - handful of files up to a week's worth of hours
2. Updating producer: 1 hour to 10 hours - handful of files up to a week's worth of hours
3. New handler - 2 hour to 10 hours, plus multiple days for a handful of files
4. Updating handler - 2 hour to 10 hours, plus multiple days for a handful of files

When noncompliances are found the process increases significantly with additional requirements for both the operator and MOSA.

Note also that we have changed our update application process for simplicity and efficiency while still maintaining balance with the requirements set forth in the NOS. Our update application process has significantly been decreased compared to prior years at MOSA.

We've also cut our time spent on initial reviews by about half compared to previous years.

**Question: How long does it take you to – prepare and submit your annual report to the NOP?**

January 2 list takes 2-3 weeks of solid work by our Quality Manager to prepare and submit.

Comments about the list:

1. Standardized form for submission of information that does not change from year to year is necessary. Continuous changes require us to spend time

reentering the same information from year to year. We request standardization and continuation of that standardization year after year.

2. The limitations on the list of certified products (top 5) is challenging to meet. We'd prefer listing all product that entities are certified to produce. These will change annually somewhat, but allowing us to submit the complete list of certified products will save immense amounts of time on our part.
3. We have a concern about asking for personal email addresses when the information goes to a public forum. Having personal emails in a public forum would open our clients up to potential spam. We decline to submit personal email addresses.

**We also add to this information the time we spend to prepare for accreditation audits.**

Updates – 1.5 days to prepare

Reaccreditation on site – 1 to 2 weeks to prepare, plus time when auditors are on site.

MOSA Documentation Burden Survey 2013  
Inspectors

MOSA surveyed 33 inspectors asking two questions:

1. How much time does it take you to do an inspection?
2. How much time does it take you to do your reports?

An overall, general response culled from the 33 responses is:

1. An average of 3.5 hours for inspections
2. An average of 2.4 hours for report writing

But these averages don't tell the accurate story, which almost every inspector pointed out: the answer really depends on several factors. Inspectors agree that there are some inspections (particularly crop-only operations) that can be completed in a short time, even less than an hour. This would be true for the report-writing on these smaller, less complicated operations that have an organized set of paperwork.

Add livestock, and the time for both inspections and reports goes up about an hour. Inspectors agree that dairies add even more time. Handlers generally add more time and processors even more so. Inspectors wanted to be clear that inspections can range from 45 minutes to several days, so that the "average" number isn't as useful as fully understanding that given the variables of numbers of scopes, size of operations, and operator-preparedness, the time it takes to inspect and report well on an operation is highly variable.



MOSA Documentation Burden Survey 2013  
Associates

MOSA surveyed 221 clients asking four questions:

1. How long does it take you to update your organic system plan each year?
2. How long does it take you to demonstrate your compliance with the pasture rule?  
(Ruminant livestock producers only)
3. How long does it take you to demonstrate that an ingredient isn't commercially available in organic form? (Processors only)
4. How long does it take you to prepare for your on-site inspection each year?

Most clients answered the time question for both the organic system plan and the time for preparation for inspection. Results for the other two questions were minimal and not a good sample

Significant responses:

1. Operators take an average of 7.76 hours filling out the MOSA update organic system plan.
2. Operators take an average of 5.67 hours to prepare for their inspection each year.

Some important aspects to keep in mind about these numbers. Some people counted all the work that they do throughout the year to prepare for filling out their update paperwork. For example, some people answered that they spend some time every day on their paperwork and so they put down 60 hours to complete their paperwork. Others said virtually the same thing (I spend some time on this every day) and put down 1 hour for their answer to time.

MOSA associates pointed out repeatedly that our new Easy OSP has saved them a substantial amount of time in filling out the paperwork. We heard of reductions in time spent up to 75 percent in this, the first year of our new form.

How much time does it take you to do an inspection?	Time to inspect just crops?	Time to inspect crops and livestock?	Time to inspect processors?
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2	1.5	2.5	
4	3.5	4.5	4.5
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4	2.5	5	
4.5			
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3	3	4	4
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3	2.5	3.5	
3.5	3	4.5	
3	2.5	4	3.5
5.5			
5			
2.3	2	3.5	
6			
4			
4			
3.5			
3.509677419			

How much time does it take you to do your reports?	Time to do reports for just crops?	Time to do reports for crops and livestock?
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3.5

2

1.5

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4

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2

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4

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2.5

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1.5

2.406451613

Time to do reports for  
processors?

Notes