

PUBLIC SUBMISSION

| |
|--------------------------------------|
| As of: September 12, 2013 |
| Received: September 10, 2013 |
| Status: Posted |
| Posted: September 12, 2013 |
| Tracking No. 1jx-879b-nsje |
| Comments Due: August 27, 2013 |
| Submission Type: Web |

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-13-0051-0048

Karr, Connie

Submitter Information

Name: Connie Karr

Address:

Corvallis, OR, 97333

Email: connie@tilth.org

General Comment

Comments in attached pdf

Attachments

OTCO_RecordBurden_Comments



260 SW Madison Ave. Ste 106 | Corvallis, OR 97333 | www.tilth.org | PH 503.378.0690 | FX 541.753.4924 | organic@tilth.org

August 26th, 2013

Toni Strothers
Agricultural Marketing Specialist
National Organic Program
AMS/USDA
1400 Independence Ave. SW, Room 2646-SO, Ag Stop 0268
Washington DC 20250-0268

Re: Docket No: AMS—NOP-13-0051; NOP-13-02

Dear Toni,

Oregon Tilth appreciates the opportunity to comment on the record keeping requirements and its burdens on organic operations and certification agents. Oregon Tilth agrees that reporting and record keeping are essential to the integrity of the organic certification system. These requirements work to ensure that operations are maintaining compliance and can demonstrate this with the regulations during their annual or unannounced inspections carried out by the certifiers.

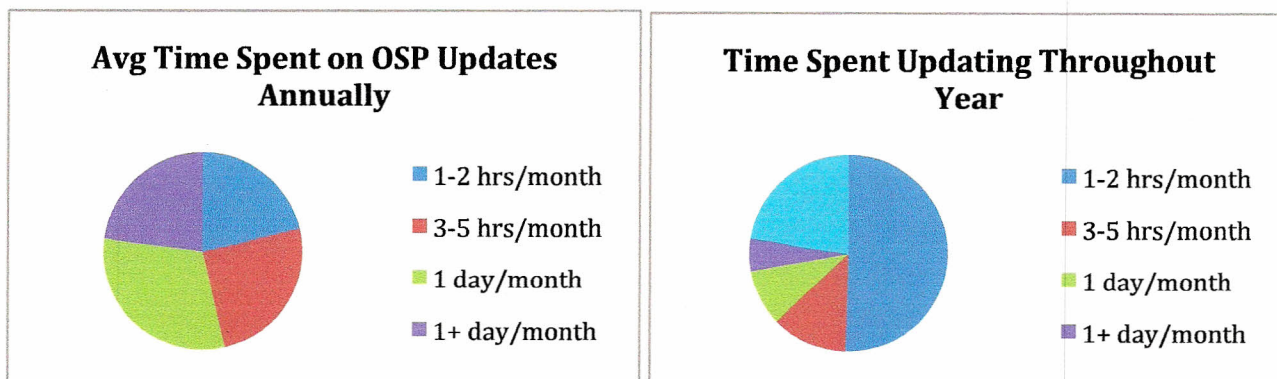
We would like to comment specifically in response to the NOP's questions that were posted in the NOP insider on June 28, 2013. In an effort to assist with gathering of this information the OTCO program conducted a survey of operations during the month of July. We received an approximate 12% survey return rate from our clients. We believe that due to the timing of the survey it was challenging for many farmers to participate. However the information received represents results that we believe would hold strong even with more participation.

Annual updates for Certified Operations

We asked participants to estimate how long it takes them to update their organic system plan each year. The majority (55%) indicate it takes them from anywhere between 3 hours to a day to complete this annual update request. Of the 55% who indicated this, 30% stated it was a day or more. The OTCO program has made substantial changes in the past year to simplify the annual update process. However, with operations required to report changes affecting compliance with the act, there is often a great number of changes that need to be described in this annual update process.

We also asked participants how much time they spend sending Oregon Tilth updates throughout the year. A majority (53.7%) state that they spend 1-2 hours a month sending OTCO updates while 13.2% stated they spend 3-5 hours a month. We find that the majority of those that spend 3-5 hours a month on these updates are handlers who have changes in labels,

products or formulations that need to be reviewed.



Demonstrating Compliance with the Pasture Rule

Clients were asked how long, on average, they spend demonstrating compliance with the pasture rule. Of the respondents who were ruminant livestock producers, the majority stated they spend 1-2 hours a month demonstrating this compliance. A few, larger operations claimed they spent about a day or several days a month with this pasture rule compliance documentation. In one case a comment was made that the requirements did not fit all ruminant producers equally. Feed rations change quite frequently for predominant grazing operations and it is challenging and creates a large burden to record and report on the specifics to satisfy the requirements.

Demonstrating Commercial Unavailability of Organic Ingredients

For those processors that must demonstrate commercial unavailability we requested their feedback on time spent to document and report this. Most operations who participated and have to demonstrate this, claim that it takes between 1-2 hours a month, while a few operations stated that it takes them a day a month to complete this documentation and reporting. We feel that the operations taking a day a month are larger handler operations that may be using multiple non-organic agricultural ingredients.

In addition to the survey of operations to inform our comments as above, OTCO would like to also provide information as requested of certifying agents.

Review a Farm or Business Application for Certification

OTCO certifies all types of operations and the amount of time spent reviewing an operations application greatly depends on the complexity, number of fields, materials and products to review. On average an application review for a new applicant takes approximately 2-3 hours to review. Although some complex operations can take up to a full 8-hour day, and some simple operations can be done quicker, the average time is 2-3 hours. Conducting the review of the inspection report along with the OSP in order to determine certification also averages about 2-3 hours. In entirety, it takes 4-6+ hours on average to review a farm or business application for certification and make a certification decision.

Annual Report Submission

The annual report process can be cumbersome. Although it has greatly improved over the years, we would like to see it made more efficient when there are no changes to report. Currently, as a certifier we spend an entire 8-hour day (minimum) preparing this annual report even when changes to our system are minimal. A great number of attachments are required. We feel that this process could still greatly improve by automating through a web interface that allows certifiers to report only changes.

The OTCO program takes great pride in our program and we have done a great amount of work to increase efficiency while maintaining compliance in all areas of our accreditation. Like the NOP, we will continue striving for improved efficiencies. The client survey results suggest many ideas for improvements. These include online applications and online material lists. Both ACA's and certified operations understand the need to document compliance.

As a certifier we would like to ensure that the burden of records and reporting do not come extraneous on our operators pushing them out of certification. We would urge the NOP to continue to work on creating policies and guidance that are sound and sensible and create the balance needed between sensible practices and sound compliance and certification.

We hope that you find these comments helpful and useful in determining the reporting and record keeping burden.

Sincerely,



Connie Karr
Certification Director
Oregon Tilth Certified Organic