

# PUBLIC SUBMISSION

<b>As of:</b> September 12, 2013 <b>Received:</b> September 10, 2013 <b>Status:</b> Posted <b>Posted:</b> September 12, 2013 <b>Tracking No.</b> 1jx-878g-zgux <b>Comments Due:</b> August 27, 2013 <b>Submission Type:</b> Web
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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-13-0051-0051

Haines, Ben

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## Submitter Information

**Name:** Ben Haines

**Address:**

Elizabeth City, NC, 27909

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## General Comment

As the operator of a small to mid sized Certified Organic operation I can say the time needed to comply with the paper work required is too long. Having farmed organically with my family since 1987 we have seen a dramatic increase in the time requirements over the years.

I would estimate that even for an update I spend at least one work week completing the forms and compiling the information. Filing the complete forms takes much longer. Then comes the questions from the initial reviewer, followed by the inspector, and then the final reviewer none of whom seem to share information. Certifiers often request duplicate submissions of information, and requests for documentation of tasks which have not been performed. They seem to be constantly making new forms which you must transfer your information to, and requesting more and more paperwork even if you are just recertifying with no changes to your plan other than normal crop rotations. As seed dealers we often talk to other certified organic farmers and get their horror stories. I have even heard of certifiers requiring farms to keep a complaint folder onsite even though they have had no complaints to file in it. All this is done while hiding behind the statute requiring farms to provide them with whatever they request. Often it seems they add more and more requests to give a reason for higher fees, and justify their existence.

We have had several certifiers over the years in hopes of finding one who is able to complete things using a common sense approach with little success. This is also very time consuming as they all have their own forms and requirements making changing certifiers extremely difficult.

The cost of certification and time required may be fine for large corporations with staff dedicated to compliance, however for those of us who must complete the actual farming and paperwork it is almost insurmountable at times. It is to the point that I often question the value of continuing to be certified. While I did consider certification to be a feather in ones cap, I no longer recommend certification to those who can possibly operate without it.