

# 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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Wooton, Louisa

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## Submitter Information

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## General Comment

I am responding as both a farmer and organic inspector. Our farm is certified organic by ICS, Inc. We were formally certified by Hawaii Organic Farmer's Association (HOFA). Unfortunately, due to the cost of accreditation, HOFA is no longer a certifying entity. There is no Hawaii based certifier.

In preparing my application every year, I may spend as much as 12-20 hours collecting the appropriate information, labels, MSDS, and filling out the paper work. Some of the information that I submit has not changed in the 11 years that we have been certified, yet we have to send in the same material year after year. If there was a nation-wide, standardized application for certification, I think it might be less cumbersome. Sometimes, it seems that ICS, Inc. is continually adding more and more layers to the Organic System Plan and redundancy is the result.

As an independent Organic Farm Inspector since 2002, I find that completing the inspections for ICS, Inc. is also cumbersome and could be greatly simplified with less onerous forms. If there was a standard form nationwide, it would make life so much easier for inspectors who might do inspections for several different certifiers. This would be my primary suggestion. It can take me as much as 12 hours to complete an inspection. The fee that we receive is \$175.00. There is also a lot of time spent in phone calls and scheduling that is not included in the 12 hours.