

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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General Comment

I work as an independent organic inspector for 3-4 different certifying agents. Each certifying agent has different forms for both the client I am inspecting and the report I am to return. Some are easier to complete than others.

I currently spend 1-2 hours reviewing a client file prior to inspection, 3 hours to 3 days inspecting an entity (depending on complexity). Normally I expect to spend as much time writing up a report as I spend doing the on-site inspection. Although this is usually 8-10 hours for multiday inspections.

I spend what I feel is wasted time re-reviewing information that the certifier should have/already has reviewed before I get the file. I speak specifically about product profiles and labels for handlers that are submitted to the certifier for approval and for which I assume the certifier's reviewer has evaluated and approved. However, on the inspection report form I am asked to complete I have questions asking me to complete evaluations of the ingredient statements on labels, the placement of "Certified Organic By...." statement etc. This is a duplication of effort. If there is an issue with a profile or label the reviewer, not the inspector, should note the problem and ask the inspector to verify/clarify the issue if necessary. The inspector should be verifying that the product is being processed as stated and that the label that is approved is being used.