PUBLIC SUBMISSION

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-13-0051-0064
Lunquist, Evrett

Submitter Information

Name: Evrett Lunquist
Address:
   17201 NW 40th Street
   Raymond, NE, 68428
Email: inspector@comongoodfarm.com

General Comment

I conduct anywhere from 10 to 85 organic farm and processing inspection per year depending on the year. I also farm organically and get inspected myself. On average, I spend as much time on reporting as I do conducting an inspection--my average inspection being four hours on site with generally four hours later at home finishing reporting tasks.

Some ACAs that use a verification reporting format, with information entered by the farmer/processor, greatly reduce the amount of time spent following the on site inspection. This allows me to verify the information provided and on a separate form or within the farmer provided pages provide additional observations or issues. With this format, I might spend 2-3 hours or less reviewing/double checking/reporting for each four hour inspection.

Other ACAs use a checklist and/or narrative reporting format where I am entering information often supplied by the farmer and checking boxes regarding voluminous numbers of specific questions. I find this system redundant in that I am providing information that the farm has already stated in the their OSP, and that it consumes an excess amount of time. With this format, I might spend 5-6 hours (or more for complex operations) reviewing/double checking/reporting for each four hour inspection.

I am implementing use of a tablet this year during the inspection process and think it will prove to reduce my time involved across the board by maybe 10-15% and help me make the inspection and reporting process more efficient.