

SUMMARY OF 2013 INFORMATION COLLECTION ATTACHMENT 1

REGS	REASON	PREVIOUS BURDEN	NEW BURDEN	DIFFERENCE	TYPE OF CHANGE
Subpart B -- APPLICABILITY					
205.101(c)	Exempt producers & handlers - compliance & maintain records (3 yrs). Inc. in recordkeepers	5,147.00	6,200.00	1,053.00	ADJ
205.103	Recordkeeping by certified operations. Inc. recordkeeping hrs.	57,012.00	2,000,000.00	1,942,988.00	ADJ
Subpart C - Production & Handling -- Operators submit initial or updated Organic Plan					
205.400(b) 205.406(a)(1)(i), 205.201(a)(1)	Operators list practices & procedures to be performed & maintained (application) Dec.in respondents	14,400.00	3,150.00	-11,250.00	ADJ
205.201(a)(1)	Operators practices & procedures to be performed & maintained (update). Incr. in hours per response	279,000.00	425,000.00	146,000.00	ADJ
205.201(a)(2)	Operators list substances used (application). Dec.in respondents	3,200.00	700.00	-2,500.00	ADJ
205.201(a)(2)	Operators list substances used (update) Decr. in respondents but an incr. in per response hours.	62,000.00	100,000.00	38,000.00	ADJ
205.201(a)(3)	Operators list monitoring practices & procedures to be performed & maintained (application) Dec.in respondents	6,400.00	1,400.00	-5,000.00	ADJ
205.201(a)(3)	Operators list monitoring practices & procedures performed & maintained (update) Decr. in respondents, but an incr. in per response time.	124,000.00	175,000.00	51,000.00	ADJ

205.201(a)(4)	Operators describe recordkeeping system implemented to comply with 205.103 (initial) Dec.in respondents	3,200.00	700.00	-2,500.00	ADJ
205.201(a)(4)	Operators describe recordkeeping system implemented to comply with 205.103 (update) Dec. in respondents, but incr. in per response time.	62,000.00	100,000.00	38,000.00	ADJ
205.201(a)(5)	Operators list practices & procedures to prevent commingling & contact with prohibited substances (initial). Dec.in respondents	3,200.00	700.00	-2,500.00	ADJ
205.201(a)(5)	Operators list practices & procedures to prevent commingling & contact with prohibited substances (update) Decr. in respondents but incr. in per response time.	62,000.00	100,000.00	38,000.00	ADJ
205.201(a)(6)	Operators provide additional information as necessary (initial) Dec.in respondents	3,200.00	700.00	-2,500.00	ADJ
205.201(a)(6)	Operators provide additional information as necessary (update) Decr. In respondents but incr. in per response time.	62,000.00	100,000.00	38,000.00	ADJ
205.237, 205.103	Pasture Practice Standards (Documentation) Decrease in responses per respondent but per response time incr.	6,900.00	18,400.00	11,500.00	ADJ

Subpart D - Labels and Labeling

205.301	Certified handlers-composition of products to be labeled Inc.in respondents	170,640.00	216,560.00	45,920.00	ADJ
205.301	Exempt handlers determine composition of products to be labeled. Inc.in respondents	800.00	1,000.00	200.00	ADJ

205.303- 205.311	Certified handlers design labels in accordance with requirements for products to be labeled. Inc.in respondents	127,980.00	162,420.00	34,440.00	ADJ
------------------	---	------------	------------	-----------	-----

Subpart E - Appli. for Cert. of Operations Annual Update as Appropriate

205.406(a)(2), 205.401(b)	Operators submit names, business names, addresses, & phone numbers of cert. applicants & persons authorized to act on appli. behalf. Dec. in respondents.	16,300.00	12,500.00	-3,800.00	ADJ
------------------------------	---	-----------	-----------	-----------	-----

205.401d 205.406(a)(3)	Operators submit other information as needed for certification, annual (initial). Dec. in respondents.	1,600.00	350.00	-1,250.00	ADJ
---------------------------	--	----------	--------	-----------	-----

205.401(d) 205.406(a)(3)	Operators submit other information as needed for certification (update) Dec. in respondents.	31,000.00	25,000.00	-6,000.00	ADJ
-----------------------------	--	-----------	-----------	-----------	-----

Review of Application

205.402	Agents review applications; communicate findings; sched. on-site inspec. Decr. in respondents; hours per response incr.; Dec. in response per respondent.	30,999.26	150,192.00	119,192.74	ADJ
---------	---	-----------	------------	------------	-----

205.402(b)(2)	Agents provide copy of on-site inspec. reports. Dec. in respondents and responses per respondent.	7,749.82	6,258.00	-1,491.82	ADJ
---------------	---	----------	----------	-----------	-----

205.402(b)(3)	Agents provide copy of test results of any samples. Dec. in respondents.	1,937.33	1,677.69	-259.64	ADJ
---------------	--	----------	----------	---------	-----

205.403 205.406(b)	Inspectors provide on-site inspection reports to certifying agent, (annual). Decr. in respondents, but incr. in per response time.	130,396.72	251,450.00	121,053.28	ADJ
-----------------------	--	------------	------------	------------	-----

205.404(b), 205.406(d)	Agents issue certificates of operation; annual & updated certificates. Decr. in respondents but incr. in responses per respondent.	9,700.00	12,499.20	2,799.20	ADJ
---------------------------	--	----------	-----------	----------	-----

Denial of Certification of Operators

205.405(a); 205.406(c); 205.662(a)	Agents provide written notification of non-compliances. Dec. in # of respondents; Inc. in # responses per respondent.	1,358.00	1,680.00	322.00	ADJ
205.405(b)(1) & (b)(3)	Operators describe corrective actions taken or rebut the non-compliance. Inc. in respondents	1,240.00	1,680.00	440.00	ADJ
205.405(c)(1)(i)	Agents apprv. Corrective action & issue certificates of operation to operator. Dec. in respondents; & inc. resposnes per respondent.	291.00	378.00	87.00	ADJ
205.405(c)(1)(ii)	Agents deny certification when applicants noncompliance is not corrected; notification of applicants rights. Dec. in respondents.	53.35	21.00	-32.35	ADJ
205.405(c)(2)	Agents deny certification if applicants fail to respond. Dec. in respondents.	53.35	21.00	-32.35	ADJ
205.405(c)(3) and 205.501(a)(15)(i)	Agents send Administrator notification of approvals/denials & adverse actions Dec. in respondents	339.50	420.00	80.50	ADJ

Subpart F - Accreditation of Certifying Agents

205.500(c)(2)	EU Import Certificate (NOP 2110-1) Per response inc.	1,025.00	2,171.89	1,146.89	ADJ
205.500(c)(2)	EU Import Certificate (NOP 2110-1) Increase in recordkeepers.	65.60	85.12	19.52	ADJ
205.501(a)(2) & (a)(3)	Agents demonstrate ability to comply with & implement requirmts. for accreditation. Dec. in respondents.	970.00	840.00	-130.00	ADJ
205.501(a)(4), 205.501(a)(6)	Agents conduct & provide results of performance evaluations of inspectors & other personnel. Dec. in respondents.	1,552.00	1,344.00	-208.00	ADJ

205.501(a)(7)	Agents have prog. Evaluations conducted of certification activities (annual). Dec. in respondents.	776.00	672.00	-104.00	ADJ
205.501(a)(8)	Agents provide info to applicants seeking certification. Dec. in respondents.	3,298.00	2,856.00	-442.00	ADJ
205.501(a)(11)(v) 205.504(c)(2)	Agents provide procedures to prevent conflict of interes & req. emp. To complete conflict of interest disclosure repts. (annual) Dec. in respondents.	242.50	210.00	-32.50	ADJ
205.501(a)(15)(ii) 205.504(d)(1)	Agents provide & send lists of currently certified operations w/application (annual) Dec. in respondents.	194.00	168.00	-26.00	ADJ
205.501(a)(18)	Agents notify insp. Of certifying agents decision - granting or denying certification of operation that inspector evaluated. Dec. in respondents.	4,850.00	4,200.00	-650.00	ADJ
205.501(a)(21)	Agents comply with other terms & conditions. Decrease in responses.	48.50	84.00	35.50	ADJ

**Application for Accreditation
(Annual Update if Applicable)**

205.503(a), 205.510(a)(1)	Agents provide info about their primary location. Dec. in respondents..	24.25	21.00	-3.25	ADJ
205.503(b)	Agents provide info about their organization units. Dec. in respondents.	97.00	84.00	-13.00	ADJ
205.503(c), 205.501(a)(15), 205.642	Agents identify areas of certification (crops, livestock, handling) & file certification fee sched. w/Secretary. Dec. in respondents..	97.00	84.00	-13.00	ADJ
205.503(e)	Agents list States/foreign countries where they operate or intend to operate. Dec. in respondents..	24.25	21.00	-3.25	ADJ

Evidence of Expertise and Ability

205.504(a)(1)	Agents list personnel policies & procedures. Dec. in respondents.	48.50	42.00	-6.50	ADJ
205.504(a)(2)	Agents list names & position descriptions of personnel they intend to use. Dec. in respondents.	97.00	84.00	-13.00	ADJ
205.504(a)(3)	Agents list qualifications of insp. & emp. Who review/evaluate applications. Dec. in respondents.	97.00	84.00	-13.00	ADJ
205.504(a)(4)	Agents list training provided to personnel. Dec. in respondents.	194.00	168.00	-26.00	ADJ
205.504(b)(1)	Agents provide procedures to evaluate applicants, make decisions, issue certificates. Dec. in respondents.	97.00	84.00	-13.00	ADJ
205.504(b)(2)	Agents provide procedures to rev. compliance & report violations. Dec. in respondents.	48.50	42.00	-6.50	ADJ
205.504(b)(3)	Agents provide procedures to comply w/recordkeeping requirements. Dec. in respondents.	48.50	42.00	-6.50	ADJ
205.504(b)(4)	Agents provide procedures to maintain confidentiality. Dec. in respondents.	48.50	42.00	-6.50	ADJ
205.504(b)(5)	Agents provide procedures to make inf. Available to the public & provide the info. Dec. in respondents.	97.00	84.00	-13.00	ADJ
205.504(b)(6)	Agents provide procedures to sample & do residue testing. Dec. in respondents.	48.50	42.00	-6.50	ADJ
205.504(c)(1)	Agents provide procedures to prevent conflicts of interest. Dec. in respondents.	48.50	42.00	-6.50	ADJ

205.504(d)(2)	Agents provide inspec. Repts. & evaluation documents for operations certified - prev. yr. Decr. In respondents, but an incr. in responses per respondent..	19,400.00	24,998.40	5,598.40	ADJ
---------------	--	-----------	-----------	----------	-----

205.504(e)	agents provide other info they feel will assist in evaluating application. Dec. in respondents.	97.00	84.00	-13.00	ADJ
------------	---	-------	-------	--------	-----

Export Certificates

205.504	Agents issue & make copies available.(TM-11) Dec. in respondents..	48.50	42.00	-6.50	ADJ
---------	--	-------	-------	-------	-----

Peer Review Panel

205.509	Peer review panel submits report to Secretary regarding NOP's performance on accreditation decisions. Function obsoleted.	40.00	0.00	-40.00	ADJ
---------	---	-------	------	--------	-----

Annual Report, Recordkeeping

205.510(a)(2)	Agents rept. changes in areas and duration of accreditation (annual). Dec. in respondents.	97.00	84.00	-13.00	ADJ
---------------	--	-------	-------	--------	-----

205.510(a)(3)	Agents rept. measures implemented at req. of Administrator (annual) Per response time incr.	40.00	90.00	50.00	ADJ
---------------	---	-------	-------	-------	-----

205.510(b)(1), 205.501(a)(9)	Agents maintain records recd. From certified operators for not less than 5 yrs. Dec. in record. keepers.	97.00	84.00	-13.00	ADJ
---------------------------------	--	-------	-------	--------	-----

205.510(b)(2)	Agents maintain rec. they create regarding certified operators for not less than 10 yrs. Dec. in recordkeepers.	97.00	84.00	-13.00	ADJ
---------------	---	-------	-------	--------	-----

205.510(b)(3)	Agents maintain records pursuant to accreditation for not less than 5 yrs. Dec. in recordkeepers.	97.00	84.00	-13.00	ADJ
---------------	---	-------	-------	--------	-----

Subpart G - Administrative

205.607	Petition to amend the National List. Per response time increase.	250.00	750.00	500.00	ADJ
Noncompliance Procedure for Certified Operations					
205.662(b)	Agents notify operators of noncompliance resolution. Decr. in respondents but an increase # of responses per respondent..	339.50	420.00	80.50	ADJ
Testing					
205.670(e)	State officials or agents submit lab results to residue testing to Administrator or governing State officials.	352.50	315.00	-37.50	ADJ
205.670(e)	Recordkeeping hours.	352.50	315.00	-37.50	ADJ
205.670(f)	States & agents rept. to health agencies any findings of pesticide residues that exceed regulatory tolerances.	56.40	50.40	-6.00	ADJ
205.670(f)	Recordkeeping hours.	14.10	12.60	-1.50	ADJ
Adverse Action Appeal Process					
205.681(a)	Applicants for certification or certified operators appeal adverse decisions to Administrator. Inc. in respondents.	200.00	370.00	170.00	ADJ
	Combined totals of line items whose burden figures did not change between previous and this submission.	5,789.54	5,789.54	0.00	
TOTAL		1,327,602.47	3,923,226.84	2,595,624.37	

*** NOTE: All changes (increase or decrease) were due to adjustments in previous burden estimates. We have received more accurate reporting.**