

SUMMARY OF 2016 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	6,200.00	7,650.00	1,450.00	ADJ.
205.103	Recordkeeping by certified operations. Inc. recordkeepers.	2,000,000.00	2,480,000.00	480,000.00	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) Inc. in respondents and hrs per response	3,150.00	32,300.00	29,150.00	ADJ.
205.201(a) (1)	Operators practices & procedures to be performed & maintained (update). Incr. in hours per response	425,000.00	527,000.00	102,000.00	ADJ.
205.201(a) (2)	Operators list substances used (application). Inc. in respondents	700.00	3,800.00	3,100.00	ADJ.
205.201(a) (2)	Operators list substances used (update) Inc. in respondents	100,000.00	124,000.00	24,000.00	ADJ.
205.201(a) (3)	Operators list monitoring practices & procedures to be performed & maintained (application). Inc. in respondents	1,400.00	7,600.00	6,200.00	ADJ.
205.201(a) (3)	Operators list monitoring practices & procedures performed & maintained (update) Inc. in respondents	175,000.00	217,000.00	42,000.00	ADJ.

205.201(a) (4)	Operators describe recordkeeping system implemented to comply with 205.103 (initial) Inc.in respondents	700.00	3800.00	3,100.00	ADJ
205.201(a) (4)	Operators describe recordkeeping system implemented to comply with 205.103 (update) Inc.in respondents	100,000.00	124,000.00	24,000.00	ADJ
205.201(a) (5)	Operators list practices & procedures to prevent commingling & contact with prohibited substances (initial). Inc.in respondents	700.00	3,800.00	3,100.00	ADJ
205.201(a) (5)	Operators list practices & procedures to prevent commingling & contact with prohibited substances (update) Inc.in respondents	100,000.00	124,000.00	24,000.00	ADJ
205.201(a) (6)	Operators provide additional information as necessary (initial) Inc.in respondents	700.00	3,800.00	3,100.00	ADJ
205.201(a) (6)	Operators provide additional information as necessary (update) Inc.in respondents	100,000.00	124,000.00	24,000.00	ADJ
205.237, 205.103	Pasture Practice Standards (Documentation) Inc.in respondents	18,400.00	37,600.00	19,200.00	ADJ
205.237, 205.103	Pasture Practice Standards (Documentation) Inc.in recordkeepers	2,300.00	4,700.00	2,400.00	ADJ

Subpart D - Labels and Labeling

205.301	Certified handlers-composition of products to be labeled Inc.in respondents	216,560.00	262,680.00	46,120.00	ADJ
205.301	Exempt handlers determine composition of products to be labeled. Inc.in respondents	1,000.00	1,215.00	215.00	ADJ
205.303- 205.311	Certified handlers design labels in accordance with requirements for products to be labeled. Inc.in respondents	162,420.00	2,626,800.00	2,464,380.00	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. Inc.in respondents	12,500.00	15,500.00	3,000.00	ADJ
205.401d 205.406(a) (3)	Operators submit other information as needed for certification, annual (initial). Inc.in respondents	350.00	1,700.00	1,350.00	ADJ
205.401(d) 205.406(a) (3)	Operators submit other information as needed for certification (update) Inc.in respondents	25,000.00	31,000.00	6,000.00	ADJ

Review of Application

205.402	Agents review applications; communicate findings; sched. on-site inspec. Decr. in respondents	150,192.00	141,252.00	-8,940.00	ADJ
205.402(b) (2)	Agents provide copy of on-site inspec. reports. Dec. in respondents	6,258.00	5,885.50	-372.50	ADJ
205.402(b) (3)	Agents provide copy of test results of any samples. Dec. in respondents.	1,677.69	1,577.83	-99.86	ADJ

205.403	Inspectors provide on-site inspection reports to certifying agent, (annual). Inc. in respondents	251,450.00	267,500.00	16,050.00	ADJ
205.406(b)					
205.404(b), 205.406(d)	Agents issue certificates of operation; annual & updated certificates. Decr. in respondents	12,499.20	11,755.20	-744.00	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;	1,680.00	1,580.00	-100.00	ADJ
205.405(b) (1) & (b)(3)	Operators describe corrective actions taken or rebut the non-compliance. Dec. in # of respondents;	1,680.00	1,580.00	-100.00	ADJ
205.405(c) (1)(i)	Agents appr. Corrective action & issue certificates of operation to operator. Dec. in respondents;	378.00	355.50	-22.50	ADJ
205.405(c) (1)(ii)	Agents deny certification when applicants noncompliance is not corrected; notification of applicants rights. Dec. in respondents.	21.00	19.75	-1.25	ADJ
205.405(c) (2)	Agents deny certification if applicants fail to respond. Dec. in respondents.	21.00	19.75	-1.25	ADJ
205.405(c) (3) and 205.501(a) (15)(i)	Agents send Administrator notification of approvals/denials & adverse actions Dec. in respondents	420.00	395.00	-25.00	ADJ
Subpart F - Accreditation of Certifying Agents					
205.500(c) (2)	EU Import Certificate (NOP 2110-1) Inc. in respondents	2,171.89	2,825.09	653.20	ADJ
205.500(c) (2)	EU Import Certificate (NOP 2110-1) Increase in recordkeepers.	85.12	110.72	25.60	ADJ

205.501(a) (2) & (a)(3)	Agents demonstrate ability to comply with & implement requirmts. for accreditation. Dec. in respondents.	840.00	790.00	-50.00	ADJ
205.501(a) (4), 205.501(a) (6)	Agents conduct & provide results of performance evaluations of inspectors & other personnel. Dec. in respondents.	1,344.00	1,264.00	-80.00	ADJ
205.501(a) (7)	Agents have prog. Evaluations conducted of certification activities (annual). Dec. in respondents.	672.00	632.00	-40.00	ADJ
205.501(a) (8)	Agents provide info to applicants seeking certification. Dec. in respondents.	2,856.00	2,686.00	-170.00	ADJ
205.501(a) (11)(v) 205.504(c) (2)	Agents provide procedures to prevent conflict of interes & req. emp. To compleete conflict of interest disclosure repts. (annual) Dec. in respondents.	210.00	197.50	-12.50	ADJ
205.501(a) (15)(ii) 205.504(d) (1)	Agents provide & send lists of currently certified operations w/application (annual) Dec. in respondents.	168.00	158.00	-10.00	ADJ
205.501(a) (18)	Agents notify insp. Of certifying agents decision - granting or denying certification of operation that inspector evaluated. Dec. in respondents.	4,200.00	3,950.00	-250.00	ADJ
205.501(a) (21)	Agents comply with other terms & conditions. Decrease in respondents; inc. in responses per respondent; inc. in response time	84.00	632.00	548.00	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. TM-10CG	21.00	19.75	-1.25	ADK
205.503(b)	Agents provide info about their organization units. Dec. in respondents.	84.00	79.00	-5.00	ADK

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.	84.00	79.00	-5.00	ADK	
205.503(d)(1)	State agents document their official authority		3.75	4	0.25	ADK
205.503(d) (2)	Private agents identify their organizational purpose. Dec. in respondents.	20.50	19.50	-1.00	ADK	
205.503(e)	Agents list States/foreign countries where they operate or intend to operate. Dec. in respondents.	21.00	19.75	-1.25	ADK	

Evidence of Expertise and Ability

205.504(a) (1)	Agents list personnel policies & procedures. Dec. in respondents.	42.00	39.50	-2.50	ADK
205.504(a) (2)	Agents list names & position descriptions of personnel they intend to use. Dec. in respondents.	84.00	79.00	-5.00	ADK
205.504(a) (3)	Agents list qualifications of insp. & emp. Who review/evaluate applications. Dec. in respondents.	84.00	79.00	-5.00	ADK
205.504(a) (4)	Agents list training provided to personnel. Dec. in respondents.	168.00	158.00	-10.00	ADK
205.504(b) (1)	Agents provide procedures to evaluate applicants, make decisions, issue certificates. Dec. in respondents.	84.00	79.00	-5.00	ADJ
205.504(b) (2)	Agents provide procedures to rev. compliance & report violations. Dec. in respondents.	42.00	39.50	-2.50	ADJ

205.504(b) (3)	Agents provide procedures to comply w/recordkeeping requirements.Dec. in respondents.	42.00	39.50	-2.50	ADJ
205.504(b) (4)	Agents provide procedures to maintain confidentiality. Dec. in respondents.	42.00	39.50	-2.50	ADJ
205.504(b) (5)	Agents provide procedures to make inf. Available to the public & provide the info. Dec. in respondents.	84.00	79.00	-5.00	ADJ
205.504(b) (6)	Agents provide procedures to sample & do residue testing. Dec. in respondents.	42.00	39.50	-2.50	ADJ
205.504(c) (1)	Agents provide procedures to prevent conflicts of interest. Dec. in respondents.	42.00	39.50	-2.50	ADJ
205.504(d) (2)	Agents provide inspec. Repts. & evaluation documents for operations certified - prev. yr. Decr. In respondents	24,998.40	23510.40	-1,488.00	ADJ
205.504(e)	agents provide other info they feel will assist in evaluating application. Dec. in respondents.	84.00	79.00	-5.00	ADJ
Export Certificates					
205.504	Agents issue & make copies available.(TM-11) Dec. in respondents..	42.00	39.50	-2.50	ADJ
205.505(b)	private agents provide additional assurances with statements of agreement. Dec. in respondents..	20.50	19.50	-1.00	ADJ
Annual Report, Recordkeeping					
205.510(a) (2)	Agents rept. changes in areas and duration of accreditation (annual). Dec. in respondents.	84.00	79.00	-5.00	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.	84.00	79.00	-5.00	ADJ
205.510(b) (2)	Agents maintain rec. they create regarding certified operators for not less than 10 yrs. Dec. in recordkeepers.	84.00	79.00	-5.00	ADJ
205.510(b) (3)	Agents maintain records pursuant to accreditation for not less than 5 yrs. Dec. in recordkeepers.	84.00	79.00	-5.00	ADJ

Noncompliance Procedure for Certified Operations

205.662(b)	Agents notify operators of noncompliance resolution. Decr. in respondents	420.00	395.00	-25.00	ADJ
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Testing

205.670(e)	State officials or agents submit lab results to residue testing to Administrator or governing State officials. Decr. in respondents	315.00	296.25	-18.75	ADJ
205.670(e)	Recordkeeping hours. Decr. in recordkeepers	315.00	296.25	-18.75	ADJ
205.670(f)	States & agents rept. to health agencies any findings of pesticide residues that exceed regulatory tolerances. Decr. in respondents	50.40	47.40	-3.00	ADJ
205.670(f)	Recordkeeping hours. Decr. In recordkeepers	12.60	11.85	-0.75	ADJ

	Total of all line items that had no change in burden hours between previous submission and this renewal	4654.79	4654.79	0.00	No Change
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	Transfer of two Oranic Certification Cost-Share Programs to FSA	16270.00	0.00	-16270.00	PC
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TOTAL		3,939,496.84	7239708.78	3,300,211.94	
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* NOTE: There is an overall increase of 3,300,212 burden hours from the last submission. This adjustment increase is due to the following 2 changes: (1) an increase in the reporting and recordkeeping burden associated with a 24 percent increase in certified operations (25,000 to 31,000) since the last submission; and (2) an increase in the reporting burden due to the comment received in response to the notice published in the Federal Register (81 FR 17133) requesting an extension and a revision of a currently approved information collection and request for comments.

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205.101(c)	Exempt producers & handlers - compliance & maintain records (3 yrs). Inc. in recordkeepers	6,200.00	7,650.00	1,450.00
205.103	Recordkeeping by certified operations. Inc. recordkeepers.	2,000,000.00	2,480,000.00	480,000.00
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) Inc.in respondents and hrs per response	3,150.00	32,300.00	29,150.00
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205.201(a)(2)	Operators list substances used (update) Inc.in respondents	100,000.00	124,000.00	24,000.00
205.201(a)(3)	Operators list monitoring practices & procedures to be performed & maintained (application). Inc.in respondents	1,400.00	7,600.00	6,200.00
205.201(a)(3)	Operators list monitoring practices & procedures performed & maintained (update) Inc.in respondents	175,000.00	217,000.00	42,000.00

205.201(a)(4)	Operators describe recordkeeping system implemented to comply with 205.103 (initial) Inc.in respondents	700.00	3800.00	3,100.00
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205.201(a)(6)	Operators provide additional information as necessary (initial) Inc.in respondents	700.00	3,800.00	3,100.00
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205.237, 205.103	Pasture Practice Standards (Documentation) Inc.in recordkeepers	2,300.00	4,700.00	2,400.00

Subpart D - Labels and Labeling

205.301	Certified handlers-composition of products to be labeled Inc.in respondents	216,560.00	262,680.00	46,120.00
205.301	Exempt handlers determine composition of products to be labeled. Inc.in respondents	1,000.00	1,215.00	215.00
205.303- 205.311	Certified handlers design labels in accordance with requirements for products to be labeled. Inc.in respondents & Inc. in time per response)	162,420.00	2,626,800.00	2,464,380.00

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. Inc.in respondents	12,500.00	15,500.00	3,000.00
205.401d 205.406(a)(3)	Operators submit other information as needed for certification, annual (initial). Inc.in respondents	350.00	1,700.00	1,350.00
205.401(d) 205.406(a)(3)	Operators submit other information as needed for certification (update) Inc.in respondents	25,000.00	31,000.00	6,000.00

Review of Application

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205.402(b)(2)	Agents provide copy of on-site inspec. reports. Dec. in respondents	6,258.00	5,885.50	-372.50

205.402(b)(3)	Agents provide copy of test results of any samples. Dec. in respondents.	1,677.69	1,577.83	-99.86
205.403 205.406(b)	Inspectors provide on-site inspection reports to certifying agent, (annual). Inc. in respondents	251,450.00	267,500.00	16,050.00
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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;	1,680.00	1,580.00	-100.00
205.405(b)(1) & (b)(3)	Operators describe corrective actions taken or rebut the non-compliance. Dec. in # of respondents;	1,680.00	1,580.00	-100.00
205.405(c)(1)(i)	Agents apprv. Corrective action & issue certificates of operation to operator. Dec. in respondents;	378.00	355.50	-22.50
205.405(c)(1)(ii)	Agents deny certification when applicants noncompliance is not corrected; notification of applicants rights. Dec. in respondents.	21.00	19.75	-1.25
205.405(c)(2)	Agents deny certification if applicants fail to respond. Dec. in respondents.	21.00	19.75	-1.25
205.405(c)(3) and 205.501(a)(15)(i)	Agents send Administrator notification of approvals/denials & adverse actions Dec. in respondents	420.00	395.00	-25.00

Subpart F - Accreditation of Certifying Agents

205.500(c)(2)	EU Import Certificate (NOP 2110-1) Inc. in respondents	2,171.89	2,825.09	653.20
205.500(c)(2)	EU Import Certificate (NOP 2110-1) Increase in recordkeepers.	85.12	110.72	25.60
205.501(a)(2) & (a)(3)	Agents demonstrate ability to comply with & implement requiremnts. for accreditation. Dec. in respondents.	840.00	790.00	-50.00
205.501(a)(4), 205.501(a)(6)	Agents conduct & provide results of performance evaluations of inspectors & other personnel. Dec. in respondents.	1,344.00	1,264.00	-80.00
205.501(a)(7)	Agents have prog. Evaluations conducted of certification activities (annual). Dec. in respondents.	672.00	632.00	-40.00
205.501(a)(8)	Agents provide info to applicants seeking certification. Dec. in respondents.	2,856.00	2,686.00	-170.00
205.501(a)(11)(v) 205.504(c)(2)	Agents provide procedures to prevent conflict of interest & req. emp. To complete conflict of interest disclosure repts. (annual) Dec. in respondents.	210.00	197.50	-12.50
205.501(a)(15)(ii) 205.504(d)(1)	Agents provide & send lists of currently certified operations w/application (annual) Dec. in respondents.	168.00	158.00	-10.00
205.501(a)(18)	Agents notify insp. Of certifying agents decision - granting or denying certification of operation that inspector evaluated. Dec. in respondents.	4,200.00	3,950.00	-250.00
205.501(a)(21)	Agents comply with other terms & conditions. Decrease in respondents; inc. in responses per respondent; inc. in response time	84.00	632.00	548.00

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

205.503(a), 205.510(a)(1)	Agents provide info about their primary location. Dec. in respondents.	21.00	19.75	-1.25
205.503(b)	Agents provide info about their organization units. Dec. in respondents.	84.00	79.00	-5.00
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.	84.00	79.00	-5.00
205.503(d)(1)	State agents document their official authority (Inc. in respondents).	3.75	4.00	0.25
205.503(d)(2)	Private agents identify their organizational purpose. Dec. in respondents.	20.50	19.50	-1.00
205.503(e)	Agents list States/foreign countries where they operate or intend to operate. Dec. in respondents.	21.00	19.75	-1.25

Evidence of Expertise and Ability

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205.504(a)(2)	Agents list names & position descriptions of personnel they intend to use. Dec. in respondents.	84.00	79.00	-5.00
205.504(a)(3)	Agents list qualifications of insp. & emp. Who review/evaluate applications. Dec. in respondents.	84.00	79.00	-5.00

205.504(a)(4)	Agents list training provided to personnel. Dec. in respondents.	168.00	158.00	-10.00
205.504(b)(1)	Agents provide procedures to evaluate applicants, make decisions, issue certificates. Dec. in respondents.	84.00	79.00	-5.00
205.504(b)(2)	Agents provide procedures to rev. compliance & report violations. Dec. in respondents.	42.00	39.50	-2.50
205.504(b)(3)	Agents provide procedures to comply w/recordkeeping requirements. Dec. in respondents.	42.00	39.50	-2.50
205.504(b)(4)	Agents provide procedures to maintain confidentiality. Dec. in respondents.	42.00	39.50	-2.50
205.504(b)(5)	Agents provide procedures to make inf. Available to the public & provide the info. Dec. in respondents.	84.00	79.00	-5.00
205.504(b)(6)	Agents provide procedures to sample & do residue testing. Dec. in respondents.	42.00	39.50	-2.50
205.504(c)(1)	Agents provide procedures to prevent conflicts of interest. Dec. in respondents.	42.00	39.50	-2.50
205.504(d)(2)	Agents provide inspec. Repts. & evaluation documents for operations certified - prev. yr. Dec. In respondents	24,998.40	23,510.40	-1,488.00
205.504(e)	agents provide other info they feel will assist in evaluating application. Dec. in respondents.	84.00	79.00	-5.00

Export Certificates

205.504	Agents issue & make copies available.(TM-11) Dec. in respondents..	42.00	39.50	-2.50
205.505(b)	private agents provide additional assurances with statements of agreement. Dec. in respondents..	20.50	19.50	-1.00

Annual Report, Recordkeeping

205.510(a)(2)	Agents rept. changes in areas and duration of accreditation (annual). Dec. in respondents.	84.00	79.00	-5.00
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.	84.00	79.00	-5.00
205.510(b)(2)	Agents maintain rec. they create regarding certified operators for not less than 10 yrs. Dec. in recordkeepers.	84.00	79.00	-5.00
205.510(b)(3)	Agents maintain records pursuant to accreditation for not less than 5 yrs. Dec. in recordkeepers.	84.00	79.00	-5.00

Noncompliance Procedure for Certified Operations

205.662(b)	Agents notify operators of noncompliance resolution. Decr. in respondents	420.00	395.00	-25.00
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Testing

205.670(e)	State officials or agents submit lab results to residue testing to Administrator or governing State officials. Decr. in respondents	315.00	296.25	-18.75
205.670(e)	Recordkeeping hours. Decr. in recordkeepers	315.00	296.25	-18.75

205.670(f)	States & agents rept. to health agencies any findings of pesticide residues that exceed regulatory tolerances. Decr. in respondents	50.40	47.40	-3.00
205.670(f)	Recordkeeping hours. Decr. In recordkeepers	12.60	11.85	-0.75
205.681(a)	Applicants for certification or certified operators appeal adverse decisions to Administrator. Inc. in respondents.	200.00	370	170.00
Cost Share Program (previously approved OMB 0581-0266 merged into 0581-0191 Feb. 2016)				
	Face Page (Agreement Face Sheet AMS-33)	0.00	14.00	14.00
	Narrative Report (No Form)	0.00	112.00	112.00
	Spreadsheet of Operations Reimbursed (No Form)	0.00	4,144.00	4,144.00
	Producer/Handler Application (including proof of USDA organic certification, itemized invoice of certification fees paid, and W-9 tax form)	0.00	12,000.00	12,000.00
	Combined totals of line items whose burden figures did not change between previous and this submission.		4,654.95	
TOTAL		3,918,772.05	7,251,693.99	3,332,921.94

3,332,921.94

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

**TYPE OF
CHANGE**

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