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NOTE: The columns will calculate automatically. If Col. E's response is something other than annually, i.e., 1/6 years, list as "1/6" & decimal will display.

TITLE OF INFORMATION COLLECTION DOCUMENT
National Organic Program: Strengthening Organic Enforcement Proposed Rule

OMB NO. 0581-new
DATE PREPARED
April 7, 2020

IDENTIFICATION OF REPORTING OR RECORDKEEPING REQUIREMENT		ANNUAL BURDEN									
SECTION OF REGS. (A)	DESCRIPTION (B)	FORMS NO (S) (If "none" so state) (C)	REPORTS					RECORDS			
			NO. OF RESPONDENTS (D)	NO OF RESPONSES PER RESPONDENT (E)	TOTAL ANNUAL RESPONSES (Col. D x E) (F)	HOURS PER RESPONSE (G)	TOTAL HOURS (Col. F x G) (H)	NO. OF RECORD-KEEPERS (I)	ANNUAL HOURS PER RECORD-KEEPER (J)	TOTAL RECORD-KEEPING HOURS (Col. I x J) (K)	
Producers and Handlers (Operations)											
205.103	Subpart B -- Applicability - certified operators maintain records for not less than 5 years	None			0.00			0.00	44,760.00	0.25	11190.00
205.400	Subpart E --Certification										
205.400(b) 205.406(a)(1)(i); 205.201(a)(1) - (6), 205.401d 205.406(a)(3)	New Group of Handlers that were previously excluded from certification must get certified. Traders and brokers of organic products that facilitate the trade of, but do not directly produce, process, or manufacture agricultural products, are now required to be certified as organic and must submit initial Organic System Plan (OSP).		1922.00	1.00	1922.00	40.00		76,880.00	1,922.00	10.00	19220.00
205.400(b) 205.406(a)(1)(i); 205.201(a)(1) - (6), 205.401d 205.406(a)(3)	New operations that are required to be certified under current rules must now include a description of the new monitoring practices and procedures to verify suppliers in the supply chain and organic status of products received to prevent organic fraud in their initial Organic System Plan (OSP)	None	2501.00	1.00	2501.00	0.50		1,250.50			
205.400(b) 205.406(a)(1)(i); 205.201(a)(1) - (6), 205.401d 205.406(a)(3)	Currently certified operations (farmer and handlers) must now include a description of the new monitoring practices and procedures to verify suppliers in the supply chain and organic status of products received to prevent organic fraud when they update their OSP	None	42,259.00	1.00	42259.00	0.50		21,129.50			
Subpart D - Labels, Labeling, and Market Information											
205.300(c)	NOP Import Certificates: Organic products produced in a foreign country and exported for sale in the United States must ... arrive in the United States accompanied by a valid NOP Import Certificate (Form NOP 2110-1, approved under 0581-0191), or equivalent from a certifying agent accredited by a foreign country with whom we have an equivalence agreement. Persons wishing to export organic products to the US must obtain a NOP Import Certificate or equivalent through their certifying agent.		961.00	69.74	67023.00	0.50		33,511.50			
205.300(c)	(5) Upon receipt of the shipment, the organic importer of record must ensure the shipment is accompanied by a verified NOP Import Certificate,	None	961.00	69.74	67023.00	0.10		6,702.30			
205.307	Labeling of bulk nonretail containers - domestic products		45,721.00	6.13	280,092.01	0.10		28,009.20			
205.507	Labeling of bulk nonretail containers -international products		961.00	69.74	67023.00	0.10		6,702.30			
PRODUCERS and HANDLERS SUBTOTAL			46,682.00		527,843.01			174,185.30	46,682.00	-	30,410.00
TOTAL OF ALL PAGES			47,050.00		644,269.06			244,927.05	46,768.00		30,568.00

TOTAL - "F30" = OMB 831, 13 b; "H30" = OMB 831, 13c				691,037.06		275,495.05		
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							DATE PREPARED April 7, 2020

IDENTIFICATION OF REPORTING OR RECORDKEEPING REQUIREMENT		FORMS NO (S) (If "none" so state)	ANNUAL BURDEN							
SECTION OF REGS. (A)	DESCRIPTION (B)		REPORTS					RECORDS		
			NO. OF RESPONDENTS (D)	NO OF RESPONSES PER RESPONDENT (E)	TOTAL ANNUAL RESPONSES (Col. D x E) (F)	HOURS PER RESPONSE (G)	TOTAL HOURS (Col. F x G) (H)	NO. OF RECORD-KEEPERS (I)	ANNUAL HOURS PER RECORD-KEEPER (J)	TOTAL RECORD-KEEPING HOURS (Col. I x J) (K)
Accredited Certifying Agents										
Subpart E - Review of Application - Certifying agents										
205.402										
205.404(b) 205.406(d)	Agents upload all data for each operation into Organic Integrity Database and issue certificates of organic operation using federated organic certificate template for the first time.	None	78.00	598.49	46682.00	0.50	23,341.00			
205.501 (a)(2-4), (6-7), (11)(v), (15) & (20-21); 205.503 (a-b), (d)(1-2) & (c-e); 205.504(a-e); 205.510(a)(1-2), and 205.642	Subpart F - Accreditation of Certifying Agents - Form TM-10CG - Provide Policies, Procedures, Evidence of Expertise and Ability certification activities: New one hour of recordkeeping for new procedures & activities related to this rule (Form currently approved 0581-0191)	TM-10CG						78.00	1.00	78.00
Certifying agents develop procedures										
205.501(a)(10-13)	Certifying agents develop fraud prevention and reporting procedures		78.00	1.00	78.00	1.00	78.00			
205.501 (a)(4)-(a)(6)	Certifying agents develop procedures to demonstrate that they are sufficiently staffed and that all persons who perform certification review activities and on-site inspections (inspectors) are qualified.		78.00	1.00	78.00	1.00	78.00			
205.663	Certifying agents develop mediation procedures as per §205.504(b)		78.00	1.00	78.00	1.00	78.00			
205.501 (a)(4)-(a)(6)	Certifying agents must demonstrate that all persons (500/78 = 6*2=12/3=4) who perform on-site inspections (inspectors) are observed performing on-site inspections at least once every three years (2)		78.00	4.00	312.00	7.50	2,340.00			
205.501 (a)(4)-(a)(6)	Certifying agent reviewing staff must have 20 hours of training per year. Certifiers already offering at least 10 hours, so new burden hours are 10. Calculated as two (2) 5 hour trainings		250.00	2.00	500.00	5.00	2,500.00			
Subpart F - Accreditation of Certifying Agents										
An NOP Import Certificate, or equivalent, must be associated with all imports entering the US. NOP accredited domestic and foreign certifying agents (46) or foreign accredited certifiers (32), must verify the quantities of product being exported to and imported into the US. The NOP Import Certificate is electronic and generated on Customs and Border Protection's ACE system. (Form Approved 0581-0191)										
205.500(c)(2)	USDA Accredited Domestic Based Certifying Agents with only domestic ops that do not import foreign produced product.	NOP 2110-1	30.00	0.00	0.00	0.50	0.00			
	USDA Accredited Domestic Based Certifying Agents with 8% of Foreign Operations certified under USDA		16.00	335.12	5361.84	0.50	2,680.92			
	USDA Accredited Foreign Based Certifying Agents with 92% of foreign operations certified under USDA		32.00	963.46	30830.58	0.50	15,415.29			
	Foreign Accredited Foreign Based Certifying Agents with foreign operations that export to the U.S.		32.00	963.46	30,830.58	0.50	15,415.29			

	SUBTOTAL		110.00		114,751.00		61,926.50		78.00		78.00
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TITLE OF INFORMATION COLLECTION DOCUMENT National Organic Program: Strengthening Organic Enforcement Proposed Rule	OMB NO. 0581-new DATE PREPARED April 7, 2020
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	Inspectors										
205.403(a)(3)	Inspectors - unannounced inspections conducted on 5% of operations - 50% of those will count as full complete annual inspections. 50% are partial inspections focused on following up on specific concerns, so they are over and above the annual inspection. These unannounced inspections include the new requirement for trace back and mass balance audits. The inspections are calculated to take half the time as would be required of a full inspection.		250.00	4.67	1167.05	5.00	5,835.25				
205.501 (a)(4)-(a)(6)	Inspectors must have 20 hours of training per year. Certifiers already offering at least 10 hours, so new burden hours are 10. Calculated as two (2) 5 hour trainings.		250.00	2.00	500.00	5.00	2,500.00				
	SUBTOTAL		250.00		1667.05		8335.25				

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IDENTIFICATION OF REPORTING OR RECORDKEEPING REQUIREMENT		ANNUAL BURDEN								
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Foreign Governments										
205.511 (a)-(e)	<p>Recognition and Equivalence of foreign governments: AMS establishes arrangements with foreign governments accrediting their certifying agents to facilitate the international trade of organic products per 205.500(c)-(d) and shall conduct peer reviews of each trade arrangement on a two-year cycle, beginning at the close of the prior review, to assess the effectiveness of the other government's organic control system.</p> <p>AMS will reassess arrangements every five years to verify that the foreign government's technical requirements and conformity assessment system, as applicable, continue to be at least equivalent to the requirements of the Act, and will determine whether the arrangement should be continued.</p>		8.00	1.00	8.00	60.00	480.00	8.00	10.00	80.00
SUBTOTAL			8.00		8.00		480.00	8.00		80.00

2019 INFORMATION COLLECTION -

Strengthening Organic Enforcement (SOE)

OMB NO. 0581-NEW

REGS	REG Text	Previous Approved Burden	New Burden	Difference Between New and Previous Burden	Reason For Change	Type of Change
205.103	Subpart B -- APPLICABILITY Certified operators document compliance maintain records for not less than 5 years	0.00	11190.00	11,190.00	This shows the new recordkeeping burden due to the proposed changes only - this is not the total recordkeeping burden for currently certified operations.	ADJ
205.400(b) 205.406(a)(1)(i); 205.201(a)(1) - (6), 205.401d 205.406(a)(3)	Previously exempted Handling Operators that facilitate the trade of, but do not directly produce, process, manufacture, or physically store agricultural products, submit initial Organic System Plan (OSP) - Handling operations that conduct any activity that affects the status or ownership of an agricultural product after production as it moves from production source through the supply chain, including, but not limited to: distributing, selling, representing, trading, facilitating sale or trade of, brokering, processing, packaging, repackaging, labeling, combining, containerizing, storing, receiving, or loading. (application)	0.00	19220.00	19,220.00	2018 Farm Bill mandates traders and brokers must become certified. AMS estimates 961 or nine (9) percent of the 3846 operations in NAICS code 425 which defines a broker, trader or facilitator of transactions of agricultural products domestically (see RIA). To estimate the number of foreign operations impacted, AMS benchmarked them as equal in number to the 961 domestic operations affected since total domestic organic sales nearly equals foreign organic sales. AMS estimates 1922 new handlers in this category, and estimates recordkeeping at 10 hours annually.	ADJ
	Subpart C & E - Production & Handling -- Operators submit initial application or update existing Organic System Plan (OSP)					
205.201(a)(1) - (6); 205.400(b), 205.401d, 205.406(a)(1)(i) 205.406(a)(3)	Initial Application consists of: Operators list practices and procedures to be performed and maintained, substances used, monitoring practices & procedures, describe recordkeeping systems, practices to prevent commingling & contact with prohibited substances, and other information as necessary	0.00	1250.50	1,250.50	These are the new operations seeking certification for the first time based on existing rules. Over the next 12 months, AMS expects 2,501 operations will seek organic certification as required under current rules, based on the 5.9% rate of growth in number of operations observed in the last 12 months. The new burden accounts for the one time only new requirement to write their fraud prevention procedures as a part of their Organic System Plan (OSP).	ADJ
205.400(b) 205.406(a)(1)(i); 205.201(a)(1) - (6), 205.401d 205.406(a)(3)	New previously exempted Handling Operators that facilitate the trade of, but do not directly produce, process, manufacture, or physically store agricultural products, submit initial Organic System Plan (OSP) - Handling operations that conduct any activity that affects the status or ownership of an agricultural product after production as it moves from production source through the supply chain, including, but not limited to: distributing, selling, representing, trading, facilitating sale or trade of, brokering, processing, packaging, repackaging, labeling, combining, containerizing, storing, receiving, or loading. (application)	0.00	76880.00	76,880.00	2018 Farm Bill mandates traders and brokers must become certified. AMS estimates 961 or nine (9) percent of the 3846 operations in NAICS code 425 which defines a broker, trader or facilitator of transactions of agricultural products domestically (see RIA). To estimate the number of foreign operations impacted, AMS benchmarked them as equal in number to the 961 domestic operations affected since total domestic organic sales nearly equals foreign organic sales. AMS estimates 1922 new handlers in this category, and estimates reporting at 40 hours for the preparation of their first OSP and 20 hours for updating in subsequent years.	ADJ
205.201(a)(1) - (6); 205.400(b), 205.401d, 205.406(a)(1)(i) 205.406(a)(3)	Annual Update: Current certified operators (farmer and handlers) submit updated Organic System Plan (OSP) - current operators must include a description of the new monitoring practices and procedures to verify suppliers in the supply chain and organic status of products received, and to prevent organic fraud, as appropriate to the operation's activities.	0.00	21129.50	21,129.50	These are the currently certified operations that will be updating their OSP this year. The new burden accounts for the one time only new requirement to write their fraud prevention procedures as a part of their OSP.	ADJ
	Subpart D - Labels and Labeling					

205.300(c)	Organic products produced in a foreign country and exported for sale in the United States must ... arrive in the United States accompanied by a valid NOP Import Certificate (Form NOP 2110-1), or equivalent from a certifying agent accredited by a foreign country with whom we have an equivalence agreement. Persons wishing to export organic products to the US must obtain a NOP Import Certificate or equivalent through their certifying agent.	0	33511.50	33,511.50	New burden on foreign traders due to the mandatory use of the NOP Import Certificates (Form NOP 2110-1). The Traders will work with their certifiers to prepare the form. Estimate of number of imports coming into the United States in 2017: 67,023. Data Source: USDA Foreign Agricultural Service (FAS) Global Agricultural Trade System (GATS). Select: Partners, World Total, Product Type, Imports - General, Products: All Aggregates; Product Groups: Organic - Selected; https://apps.fas.usda.gov/gats/default.aspx . AMS estimates 30 minutes for the 961 foreign traders to work with their certifier to prepare the NOP Import Certificate (Form NOP 2110-1) for 67,023 annual shipments.	ADJ
205.300(c)	(5) Upon receipt of the shipment, the organic importer of record must ensure the shipment is accompanied by a verified NOP Import Certificate, and complies with organic regulations.	0	6702.30	6,702.30	New burden on the new domestic traders due to the new requirements to verify the organic compliance of imported shipments via the NOP Import Certificate prepared by the exporter. AMS is assuming that the 961 formerly excluded domestic handlers that are required to be certified are the same organic handlers that will need to verify the compliance of the 67,023 imported shipments. AMS estimates verification regarding compliance of shipments will take 6 minutes.	ADJ
205.307	labeling of bulk nonretail containers - domestic products	0	28009.20	28,009.20	Labeling Nonretail containers. New burden due to new requirements. 45,271 (existing, new, and domestic traders) certified operations will be modifying how they label nonretail shipments of products. 6.13 average products per the 42,259 existing certified operations in Organic Integrity Database on April 3, 2019. AMS assumes new information added to each nonretail label will take .1 hours (6 minutes).	ADJ
205.307	labeling of bulk nonretail containers -international products	0	6702.30	6,702.30	Labeling Nonretail containers. Based on number of foreign shipments 67,023 divided number of new foreign traders in FAS GATS (see above). AMS assumes new information added to each nonretail label will take .1 hours (6 minutes).	ADJ
	Review of Application					
205.404(b) 205.406(d)	Agents upload all data for each operation into Organic Integrity Database using federated organic certificate template in Integrity for the first time.	0.00	23341.00	23,341.00	AMS assumes that certifiers will need 30 minutes on average to upload remaining data pertaining to certified operations into INTEGRITY for the first time	ADJ
205.403(a)(3)	Inspectors - unannounced inspections conducted on 5% of operations - 50% of those will count as full complete annual inspections. 50% are partial inspections focused on following up on specific concerns, so they are over and above the annual inspection. These unannounced inspections include the new requirement for trace back and mass balance audits. The inspections are calculated to take half the time as would be required of a full inspection.	0.00	5835.25	5,835.25	AMS assumes that 2.5% of 46682 of operations will received targeted 5 hour unannounced inspections by 250 inspectors.	ADJ
	Subpart F - Accreditation of Certifying Agents Application, Evidence of Expertise, and Annual Updates					

205.501 (a)(2-4), (6-7), (11)(v), (15) & (20-21); 205.503 (a -b), (d)(1-2) & (c-e); 205.504(a -e); 205.510(a)(1-2), and 205.642	Accreditation of Certifying Agents - Form TM-10CG - Provide Policies, Procedures, Evidence of Expertise and Ability, describe organizational units, primary location, areas of certification (crops, livestock, & handling), States & foreign countries where they operate, lists of currently certified operations, conduct & provide results of performance evaluations of personnel & inspectors, conduct program evaluations of their certification activities, provide procedures for residue testing, and other information that will assist in evaluating their application, and comply with any other requirements. Consolidated Accreditation application activities & 100% annual updating activity common to all certifying agents	0.00	78.00	78.00	This provides for new annual recordkeeping burden for certifying agents addressing new procedures and requirements in this proposed rule.	ADJ
205.501(a)(10-13)	Certifying agents develop fraud prevention and reporting procedures	0	78.00	78.00	AMS assumes one hour to draft fraud and reporting procedures.	ADJ
205.501 (a)(4)-(a)(6)	Certifying agents develop procedures to demonstrate that they are sufficiently staffed and that all persons who perform certification review activities and on-site inspections (inspectors) are qualified.	0	78.00	78.00	AMS assumes one hour to draft staff qualification evaluation procedures.	ADJ
205.663	Certifying agents develop mediation procedures as per §205.504(b)	0.00	78.00	78.00	AMS assumes one hour to draft mediation procedures	ADJ
205.501 (a)(4)-(a)(6)	Certifying agents must demonstrate that all persons who perform on-site inspections (inspectors) are observed performing on-site inspections at least once every three years	0	2340.00	2,340.00	Overestimated that certifying agents will observe 4 inspections annually. Each observation is expected to require 7.5 hours to observe the actual inspection, debrief the inspector, and draft the report.	ADJ
205.501 (a)(4)-(a)(6)	Certifying agent reviewing staff must have 20 hours of training per year. Certifiers already offering at least 10 hours, so new burden hours are 10. Calculated as two (2) 5 hour trainings	0	2500.00	2,500.00	10 hours of annual mandatory training for 250 certification review staff. Certifiers are already offering 10 hours annually voluntarily, so new burden hours are 10.	ADJ
205.501 (a)(4)-(a)(6)	Inspectors must have 20 hours of training per year. Certifiers already offering at least 10 hours, so new burden hours are 10. Calculated as two (2) 5 hour trainings.	0	2500.00	2,500.00	10 hours of annual mandatory training for 250 inspectors. Certifiers are already offering 10 hours annually voluntarily, so new burden hours are 10.	ADJ
205.500(c)(2)	An NOP Import Certificate, NOP 2110-1, or equivalent, must be associated with all imports entering the US. NOP accredited domestic and foreign certifying agents (46) or foreign accredited certifiers (32), must verify the quantities of product being exported to and imported into the US. The NOP Import Certificate is required for all imports of Organic Products.				See below	ADJ
	USDA Accredited Domestic Based Certifying Agents with only domestic ops that do not import certificates		0.00	0.00		
	USDA Accredited Domestic Based Certifying Agents that handle 8% of Foreign Operations certified under USDA		2680.92	2,680.92	Estimate of number of organic imports coming into the United States in 2017: 67,023. Data Source: USDA Foreign Agricultural Service (FAS) Global Agricultural Trade System (GATS). Select: Partners, World Total, Product Type, Imports - General, Products: All Aggregates; Product Groups: Organic - Selected: https://apps.fas.usda.gov/gats/default.aspx . AMS estimates 30 minutes for certifiers to work with their foreign based operations to prepare the NOP Import Certificate (Form NOP 2110-1) for 8% of 67,023 annual shipments.	ADJ

	USDA Accredited Foreign Based Certifying Agents with 92% of foreign operations certified under USDA		15415.29	15,415.29	Estimate of number of organic imports coming into the United States in 2017: 67,023. Data Source: USDA Foreign Agricultural Service (FAS) Global Agricultural Trade System (GATS). Select: Partners, World Total, Product Type, Imports - General, Products: All Aggregates; Product Groups: Organic - Selected: https://apps.fas.usda.gov/gats/default.aspx . AMS estimates 30 minutes for foreign-based USDA certifiers to work with their foreign based operations to prepare the NOP Import Certificate (Form NOP 2110-1) for 46% of 67,023 annual shipments.	ADJ
	Foreign Accredited Foreign Based Certifying Agents with foreign operations that export to the U.S.		15415.29	15,415.29	Estimate of number of imports coming into the United States in 2017: 67,023. Data Source: USDA Foreign Agricultural Service (FAS) Global Agricultural Trade System (GATS). Select: Partners, World Total, Product Type, Imports - General, Products: All Aggregates; Product Groups: Organic - Selected: https://apps.fas.usda.gov/gats/default.aspx . AMS estimates 30 minutes for foreign accredited certifiers to work with their foreign based operations to prepare the NOP Import Certificate (Form NOP 2110-1) for 46% of 67,023 annual shipments.	ADJ
205.511 (a)-(e)	Recognition and Equivalence of foreign governments: AMS establishes arrangements with foreign governments accrediting their certifying agents to facilitate the international trade of organic products per 205.500(c)-(d) and shall conduct peer reviews of each trade arrangement on a two-year cycle, beginning at the close of the prior review, to assess the effectiveness of the other government's organic control system. AMS will reassess arrangements every five years to verify that the foreign government's technical requirements and conformity assessment system, as applicable, continue to be at least equivalent to the requirements of the Act, and will determine whether the arrangement should be continued.		480.00	480.00	The USDA has negotiated and approved trade arrangements with eight foreign governments to facilitate the international trade of organic products. The proposed rule describes the use of trade arrangements in more detail; this creates a new type of PRA respondent category. The proposed rule would require periodic assessment of trade arrangements. AMS expects these periodic peer review assessments would be similar in depth and frequency to the audits of accrediting certifying agents under USDA organic regulations and estimates a comparable level of reporting of 60 hours annually by foreign governments with whom AMS has negotiated trade arrangements.	ADJ
205.511 (a)-(e)	Recognition and Equivalence of foreign governments: AMS establishes arrangements with foreign governments accrediting their certifying agents to facilitate the international trade of organic products per 205.500(c)-(d) and shall conduct peer reviews of each trade arrangement on a two-year cycle, beginning at the close of the prior review, to assess the effectiveness of the other government's organic control system. AMS will reassess arrangements every five years to verify that the foreign government's technical requirements and conformity assessment system, as applicable, continue to be at least equivalent to the requirements of the Act, and will determine whether the arrangement should be continued.		80.00	80.00	The USDA has negotiated and approved trade arrangements with eight foreign governments to facilitate the international trade of organic products. The proposed rule describes the use of trade arrangements in more detail; this creates a new type of PRA respondent category. The proposed rule would require periodic assessment of trade arrangements. AMS expects these periodic peer review assessments would be similar in depth and frequency to the audits of accrediting certifying agents under USDA organic regulations and estimates a comparable level of recordkeeping burden of 10 hours annually by foreign governments with whom AMS has negotiated trade arrangements.	ADJ
TOTAL		0.00	275495.05	275,495.05		

Supplemental Sheets **the numbers are correlated to the new revised grid**

US Operations - New and Existing Normal	US Operations - Formerly excluded	Foreign Ops - New and Existing Normal	Foreign Operations - Formerly excluded	US Based Certifiers	US Foreign Based Certifiers	Foreign Governments	Foreign Accredited Foreign Certifiers	Domestic Inspectors	Foreign Inspectors	Misc. (Petitioners)
13,294.20	38,440.00	9,175.90	38,440.00	13,771.29	8,549.81	480.00	15,415.29	3,442.80	2,392.45	
28,090.20	4,702.30	4,702.30	33,511.50					1,475.00	1,025.00	
			2,993.45	2,080.34						
			2,880.93	15,415.29						
Total	41,213.40	45,142.30	15,878.10	71,951.50	19,446.77	27,065.44	480.00	15,415.29	4,917.80	3,417.45

% Domestic Certifiers 78
% USDA Foreign Certifiers 0.59
total operations 2501
total hours 41698
total cost \$ 41688.0359993
exempt operation <= 11 % 2824.17
17846

	Domestic	International	New Excluded Handlers
Developing a benchmark approach	91	91	
Export Certificate # of shipments	3723	18	
US compromised shipments	65321000		
# of foreign reimport certifying			certifiers accredited
report certificates (via webpage)			US/USDA inspectors
new/renew label			number of us handlers plus new formerly excluded handlers
private labels			not yet determined
unannounced inspections	2%		2.2% were full inspection criteria
qualifications & training	inspection & employees		FBI + DOJ cover an inspection plus 250
equivalency	go with accreditation model of 60 hours per year		
specials	no new requirements		
trainability	coincided among the unannounced audits above		feedback audits

RECORDKEEPING HOURS

Producers	Certifiers	US For Certifiers	Foreign Govt	Foreign Cert	Inspectors	Misc.
30,450.00	46.02	32.00	80.00			44760 26408.4
Total	30,450.00	46.02	32	80.00		

SUBMARY TABLE

Response Categories	Number of Respondents	Wage Category	Wage Rates May 2018	US Benefits	Total Reporting Hours	Total Reporting Costs	Total Record Keeping Hours	Total Record Keeping Costs	Total All Costs	Total All Hours	Total hours per respondent	Total cost per respondent	Total cost for US Based Operations	Total cost for foreign based operations
Certified Producers & Handlers - New and Existing Domestic	26408	15-9013 Farmers, Ranchers, and other Agricultural Managers	\$38.62	\$50.86	41,213.41	\$1,096,218.28	4,802.30	\$257,799.58	\$1,452,040.13	46,398.23	1.81	\$92.09	\$2,989.81	\$2,989.81
Formerly Excluded Handlers - Domestic	961	15-9013 Farmers, Ranchers, and other Agricultural Managers	\$38.62	\$50.86	45,142.30	\$1,295,937.38	9,800.00	\$488,744.60	\$1,784,701.98	14,712.30	56.97	\$2,897.71		
Certified Producers & Handlers - New and Existing Foreign	18352	15-9013 Farmers, Ranchers, and other Agricultural Managers	\$19.96	\$27.13	15,878.10	\$430,772.83	4,987.00	\$124,488.73	\$555,241.56	20,446.00	1.12	\$30.26	\$2,332.82	\$2,332.82
Formerly Excluded Handlers - Foreign	961	15-9013 Farmers, Ranchers, and other Agricultural Managers	\$19.96	\$27.13	71,951.50	\$1,912,044.20	9,800.00	\$260,713.30	\$2,172,757.50	81,543.50	84.87	\$2,302.56		
US Based Certifiers	46	13-1041 Compliance Officers	\$34.86	\$45.91	5,474.58	\$190,333.49	46.02	\$1,112.81	\$191,446.30	1,201.60	124.36	\$5,709.48	\$12,814.32	\$12,814.32
US Based Certifiers - data entry	46	43-9199 Office & Admin Support Workers	\$18.02	\$23.73	13,771.19	\$248,823.54	0.00	\$0.00	\$248,823.54	13,771.19	299.37	\$7,104.84		
US Foreign Based Certifiers	32	World Bank CEO's Wage rates	\$18.09	\$24.59	17,495.43	\$430,181.29	32.00	\$784.81	\$430,966.10	17,527.43	547.74	\$13,462.75	\$1,142,060.31	\$1,142,060.31
US Foreign Based Certifiers - data entry	32	World Bank CEO's Wage rates	\$9.35	\$12.71	9,359.81	\$121,833.25	0.00	\$0.00	\$121,833.25	9,359.81	299.06	\$3,801.04	\$17,248.80	\$17,248.80
US based Inspectors	148	45-2011 Agricultural Inspectors	\$21.60	\$28.45	4,917.80	\$139,897.57	0.00	\$0.00	\$139,897.57	4,917.80	33.23	\$1,945.25		
Foreign based inspectors	502	45-2011 Agricultural Inspectors	\$11.23	\$15.27	3,417.45	\$12,172.64	0	\$0.00	\$12,172.64	3,417.45	33.50	\$151.50		
Foreign Governments	8	13-1041 Compliance Officers	\$38.09	\$24.59	480.00	\$11,802.21	80.00	\$1,917.03	\$13,719.24	560.00	70.00	\$4,721.15		
Foreign Accredited Certifiers	32	World Bank CEO's Wage rates	\$18.09	\$24.59	15,415.29	\$379,800.04	0.00	\$0.00	\$379,800.04	15,415.29	481.73	\$11,844.69		
total reporting & recordkeeping respondents	47650.00				244,927.03	\$ 8,497,039.86	20,568.02	\$ 1,214,619.86	\$ 9,711,655.72	275,495.07	2,633.76			
Domestic & Foreign					0.38	\$ 180.60	0.65	\$25.97						
Recordkeeping respondents (less foreign agents & inspectors)	46768.00													
all reporting respondents plus exempt operations	47650.00													
of responses per all respondents	14.89	4.61												
reporting responses per reporting respondents	13.69													
recordkeeping responses per recordkeeping respondents	0.9982													

44760

State Certifier Breakout for OMB E1 question E13

Number of Respondents	Total State State Certifiers	Total State Certifier Burden Hours	Total State Certifier Hours	Total State Certifier Total responses of certifying agents	Total State Certifier Responses
All Operations	6682.00				
USDA Certifiers	78.00	18	19491.79	3,998.32	114,711.00
Domestic based with only domestic ops with no involvement in imports	30.00				
Domestic based with Foreign Ops	18.00				
USDA Accredited Foreign Based Certifying Agents	32.00				
Foreign Governments	8.00				
Foreign Accred Certifiers	32.00				
Inspectors & Inspecting staff	500.00				
Petitioners	47378.00				
Total Responses #13b	691,037.96				

1,492.54 # of responses per state in one year
0.17209326399

hours per response for states

		Domestic		International			
		Reporting		Record-Keeping		Reporting	
Table 2	Excluded Handlers	38,440.00					
	Currently Certified Operators	(23,896.42)					
	Farmers	860.00	38,440.00				52,983.38
	Handlers		(17,769.98)				

Organic Integrity Database 04/03/2019

	all	united states	reporting	recordkeeping	international	reporting	recordkeeping
All Certified	42559	27213	0.644052154371		15342	0.355947845429	
Certified farms	29440	0.6966543335621	19398	0.65734076087	10042	0.34249229113	
Certified handlers	13119	0.3033436664379	7815	0.613074242774	4994	0.386925657226	
	42559	27213					

subtracted the double
from handlers

double certified	0	0
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Tables for Proposed Rule By Certified Operation Types

SUMMARY TABLE

Rounded Numbers

Respondent Categories	Number of Respondents	Wages + Benefits	Total All Hours	Total All Costs	Total hours per respondent
Certified Producers & Handlers - New and Existing Domestic	26408	\$50.86	47,815.50	\$2,432,017.78	1.54
Certified Producers & Handlers - New and Existing Foreign	18352	\$27.13	20,466.00	\$555,242.58	1.54
Formerly Excluded Handlers - Domestic	961	\$50.86	81,561.50	\$4,148,217.89	84.87
Formerly Excluded Handlers - Foreign	961	\$27.13	81,561.50	\$2,212,763.50	84.87
US Based Certifiers	46	\$45.91	5,674.58	\$260,523.49	123.36
US Based Certifiers-data entry	46	\$23.73	13,771.19	\$326,822.56	300.24
US Foreign-Based Certifiers	32	\$24.59	17,495.65	\$430,181.78	546.74
US Foreign-Based Certifiers-data entry	32	\$12.71	9,569.81	\$121,633.35	300.24
Foreign Governments	8	\$24.59	560.00	\$13,769.24	70.00
Foreign Accredited Certifiers	32	\$24.59	15,415.29	\$379,030.04	481.73
US based Inspectors	148	\$28.45	4,917.80	\$139,897.57	33.34
Foreign based inspectors	102	\$15.27	3,417.45	\$52,172.66	33.34
	47,153.00		302,226.27	11,072,272.43	2061.81

less inspectors 47005.00

6.47
total reporting respon

SUMMARY TABLE 1: *Certifying Agents*

Respondent Categories	Number of Respondents	Wages + Benefits	Hours per respondent	Cost per respondent type	Total All Hours
US Based USDA Certifying Agents	46	\$45.91	124.36	\$5,709.37	5709.48
US Based USDA Certifying Agents- data entry	46	\$23.73	300.24	\$7,124.70	13771.19
Subtotal U.S.-Based USDA Certifying Agents	46		424.60	\$12,834.06	19480.67
Foreign-Based USDA Certifying Agents	32	\$24.59	547.74	\$13,468.93	17495.65
Foreign-Based USDA Certifying Agents-data entry	32	\$12.71	300.24	\$3,816.05	9569.81
Subtotal Foreign-Based USDA Certifying Agents	32		847.98	\$17,284.98	27065.46
Total USDA Accredited Certifying Agents	78			\$30,119.04	46546.13
Foreign Accredited Certifying Agents	32	\$24.59	481.73	\$11,844.69	15,415.29
All Certifying Agents	110				61961.42

SUMMARY TABLE 2: *Inspectors*

Respondent Categories	Number of Respondents	Wages + Benefits	Hours per respondent	Cost per respondent type	Total All Hours
USDA US based Inspectors	148	\$28.45	33.34	\$948.43	4917.80
USDA Foreign based inspectors	102	\$15.27	33.34	\$508.99	3417.45

All USDA Inspectors	250				8335.25
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SUMMARY TABLE: Certified Organic Operations and New Applicants					
Respondent Categories	Number of Respondents	Wages + Benefits	Total hours per respondent	Total cost per respondent type	Total All Hours
Certified Producers & Handlers - New and Existing Domestic	26408	\$50.86	1.54	\$78.33	47,815.50
Certified Producers & Handlers - New and Existing Foreign	18352	\$27.13	1.54	\$41.78	20,466.00
All New and Existing Producers & Hamdlers	44760				68,281.50

SUMMARY TABLE: Trade Facilitators & Brokers					
Respondent Categories	Number of Respondents	Wages + Benefits	Total hours per respondent	Total cost per respondent type	Total All Hours
Formerly Excluded Handlers - Domestic	961	\$50.86	56.97	\$2,897.49	54,752.30
Formerly Excluded Handlers - Foreign	961	\$27.13	84.87	\$2,302.56	81,561.50
All Uncertified Handlers	1922				136,313.80

Total cost per respondent type			
\$93.51	\$4,171.31	Total cost for US Based Operations	\$78.33
\$37.68	\$2,340.24	Total cost for foreign based operations	\$41.78
\$4,077.80			
\$2,302.56			
\$5,663.55	\$12,792.14	total cost for US Based Certifiers	
\$7,128.58			
\$25,287.87			\$20,946.88
		total all USDA certifiers domestic and foreign	
\$3,813.75	\$29,101.62	foreign USDA certifiers	
\$1,721.15	\$13,769.24	560.00	
\$25,749.32			
\$945.25			
\$511.50			

\$ 226.53	0.67847122647	\$24.59
g hours per all idents	total record keeping hours per all less inspectors	

Total All Costs
\$262,636.29
\$326,822.56
\$589,458.85
\$430,181.78
\$121,633.35
\$551,815.13
\$1,141,273.98
\$379,030.04
\$1,520,304.02

124.36
300.24
546.74
299.22

Total All Costs
\$139,897.57
\$52,172.66

481.73
33.37
33.37

\$192,070.23

84.87

84.87

1.81

1.12

70

Total All Costs
\$2,432,017.86
\$555,242.58
\$2,987,260.44

2061.7

Total All Costs
\$2,784,701.98
\$2,212,763.50
\$4,997,465.47

300.24

Summary Table 4: All Hours and Costs, All

Total for All (Reporting & Recordkeeping)
All Reporting
All Recordkeeping

Just Domestic-All (Reporting & Recordkeeping)

Just Domestic Reporting

Just Domestic Recordkeeping

Just Foreign-All (Reporting & Recordkeeping)

Just Foreign Reporting

Just Foreign Recordkeeping

\$4,171.31

\$2,340.24

Domestic Hours and Costs, and All Foreign Hours and Costs			
Hours	Costs	# of Respondents	Respondent Types
275,495	\$9,711,656	47,050	Certifying agents, certified operations, inspectors, and foreign governments
244,849	\$8,494,137	47,050	inspectors, and foreign governments
30,568	\$1,214,620	46,768	Certifying agents, certified operations, and foreign governments.

126,977	\$5,946,076	27,563	Certifying agents, certified operations, and inspectors
110,719	\$5,119,399	27,563	Certifying agents, certified operations, and inspectors
16,258	\$826,677	27,415	Certifying agents and certified operations

148,518	3,765,579	19,487	Certifying agents, certified operations, inspectors, and foreign governments
134,130	3,374,738	19,487	Certifying agents, certified operations, inspectors, and foreign governments
259,237	387,943	19,353	Certifying agents, certified operations, and foreign governments

Total cost for US Based Operations
Total cost for foreign

Supplemental Sheets

the numbers are correlated to the new revised grid

REPORTING HOURS

0.59 0.41

US Operations - New and Existing Normal	US Operations - formerly excluded	Foreign Ops - - New and Existing Normal	Foreign Operations - formerly excluded
13,204.20	38,440.00	9,175.80	38440.00
28,009.20	33,511.50	6,702.30	33511.50

Total 41,213.40 71,951.50 15,878.10 71951.50

RECORDKEEPING HOURS

Producers	Certifiers	US For Certifiers	Foreign Govt
31,655.50	46.02	32.00	80.00
	-		

Total 31,655.50 46.02 32 80.00

35.90% US Benefits 0.32

SUMMARY TABLE				
USDA Certified Operations Reporting Burden				
Respondent Categories	Number of Respondents	Wage + Benefits	Total Reporting Hours	Total Reporting Costs
USDA Certified Producers & Handlers - New and Existing Domestic	26,408	\$50.86	41,213.40	\$2,096,218.21
USDA Certified Producers & Handlers - New and Existing Foreign	18,352	\$27.13	15,878.10	\$430,772.85

<i>USDA Certified Producers & Handlers - New and Existing - All</i>	44,760		57,091.50	\$2,526,991.06
USDA Formerly Excluded Handlers - Domestic	961	\$50.86	45,142.30	\$2,295,937.38
USDA Formerly Excluded Handlers - Foreign	961	\$27.13	71,951.50	\$1,952,044.20
<i>USDA Formerly Excluded Handlers - All</i>	1,922		117,093.80	\$4,247,981.57
USDA Organic Operations - All	46,682		174,185.30	\$6,774,972.63
SUMMARY TABLE				
Reporting Burden				
Respondent Categories	Number of Respondents	Wage + Benefits	Total Reporting Hours	Total Reporting Costs
USDA U.S.-Based Certifiers	46	\$45.91	5,628.56	\$258,410.68
USDA U.S.-Based Certifiers- data entry	46	\$23.73	13,771.19	\$326,822.56
<i>Total USDA U.S.- Based Certifiers</i>	46		19,399.75	\$585,233.24
USDA Foreign-Based Certifiers	32	\$24.59	17,463.65	\$429,394.97
USDA Foreign-Based Certifiers- data entry	32	\$12.71	9,569.81	\$121,633.35
<i>Total USDA Foreign-Based Certifiers</i>	32		27,033.46	\$551,028.32
Total USDA Certifiers - All	78		46,433.21	\$1,136,261.56
Foreign Accredited Certifiers	32	\$24.59	15,415.29	\$379,030.04
Total Certifiers - All	110		61,849	\$1,515,291.60

SUMMARY TABLE Cont'd				
Reporting Burden				
Respondent Categories	Number of Respondents	Wage + Benefits	Total Reporting Hours	Total Reporting Costs
USDA U.S.- based Inspectors	148	\$28.45	4,917.80	\$139,897.57

USDA Foreign based inspectors	102	\$15.27	3,417.45	\$52,172.66
USDA Inspectors	250		8,335.25	\$192,070.23
SUMMARY TABLE				
	Reporting Burden			
Respondent Categories	Number of Respondents	Wage + Benefits	Total Reporting Hours	Total Reporting Costs
Foreign Governments	8	\$24.59	480.00	\$11,802.21
All Respondents - Reporting Burden	47,050		244,849	\$8,494,136.66

275,417 **\$9,708,756.39**

US Based Certifiers	US Foreign Based Certifiers	Foreign Governments	Foreign Accredited Foreign Certifiers	Domestic Inspectors
13,771.19	9,569.81	480.00	-	3,442.80
-				1,475.00
2,947.64	2,048.36			
2,680.92	15,415.29			
19,399.75	27,033.46	480.00	-	4,917.80

Foreign Cert	Inspectors	Misc.
80.00		

SUMMARY TABLE		USDA Certified Operations Recordkeeping Burden		
Respondent Categories	Number of Respondents	Wage + Benefits	Total Record keeping Hours	
USDA Certified Producers & Handlers - New and Existing Domestic	26,408	\$50.86	6,602.10	
USDA Certified Producers & Handlers - New and Existing Foreign	18,352	\$27.13	4,587.90	

	<i>USDA Certified Producers & Handlers - New and Existing - All</i>	44,760		11,190.00
	USDA Formerly Excluded Handlers - Domestic	961	\$50.86	9,610.00
	USDA Formerly Excluded Handlers - Foreign	961	\$27.13	9,610.00
	<i>USDA Formerly Excluded Handlers - All</i>	1,922		19,220.00
	USDA Organic Operations - All	46,682		30,410

	SUMMARY TABLE	USDA Certifying Agents Recordkeeping Burden		
	Respondent Categories	Number of Respondents	Wage + Benefits	Total Record keeping Hours
	USDA U.S.-Based Certifiers	46	\$45.91	46.02
	USDA U.S.-Based Certifiers- data entry	46	\$23.73	
	<i>Total USDA U.S.- Based Certifiers</i>	46		46.02
	USDA Foreign-Based Certifiers	32	\$24.59	32
	USDA Foreign-Based Certifiers- data entry	32	\$12.71	
	<i>Total USDA Foreign-Based Certifiers</i>	32		32
	Total USDA Certifiers - All	78		78.02
	Foreign Accredited Certifiers	32	\$24.59	0.00
	Total Certifiers - All	110		78.02
	SUMMARY TABLE Cont'd	Recordkeeping Burden		
	Respondent Categories	Number of Respondents	Wage + Benefits	Total Record keeping Hours
	USDA U.S.- based Inspectors	148	\$28.45	0.00

USDA Foreign based inspectors	102	\$15.27	0.00
USDA Inspectors			0.00

SUMMARY TABLE	Recordkeeping Burden		
Respondent Categories	Number of Respondents	Wage + Benefits	Total Record keeping Hours
Foreign Governments	8	\$24.59	80.00

All Respondents - Recordkeeping Burden	46,768		30,568
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Foreign Inspectors	Misc. (Petitioners)	
2,392.45		
1,025.00		
3,417.45		-

	% Domestic Certifiers
78	0.59
	46.02
4,996.00	338605.028194

Total Record Keeping Costs				Exempt Producers
\$335,799.58				New producers & handlers
\$124,469.60			1.53623771224	Just Current Producers

7,650.00

\$460,269.18				Just current Handlers
\$488,764.60				New Trade Facilitators, Foreign & Domestic Certifiers
\$260,719.30				
\$749,483.90				Inspectors
\$1,209,753.08			total all USDA certifiers domestic and foreign	Foreign Governments
Total Record Keeping Costs			300.243846154	
\$2,112.81				
\$2,112.81				
\$786.81				
\$786.81				
\$2,899.62				
\$0.00				
2899.62				
Total Record Keeping Costs				
\$0.00				

\$0.00

\$0.00

Total Record Keeping Costs

\$1,967.03

1,214,620

% USDA Foreign Certifiers	total operations	total handlers domestic	total handlers internatio nal
0.41	2501	41688 0.059993	41698
31.98			exempt operation
7357.77983908			

1922
% of

50,000 organic UPCs