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April 4, 2018

Ms. Michelle Arsenault, Special Assistant
National Organic Standard Board
USDA-AMS-NOP
1400 Independence Ave. SW.,
Room 2648-So., Mail Stop 0268
Washington, DC 20250-0268

Re: Docket Number: AMS-NOP-17-0057
Certification, Accreditation, and Compliance Subcommittee Discussion Document on:
Import Oversight

Dear Ms. Arsenault:

Thank you for the opportunity to provide comments to the National Organic Standards Board (NOSB) Compliance, Accreditation, and Certification Subcommittee (CACS) on the Import Oversight Discussion Document. The Accredited Certifiers Association (ACA) is a non-profit educational organization, and our membership includes 54 USDA Accredited Certification Agents and over 90% of US based certifiers accredited by the USDA.

We appreciate the time the CACS has put into this important and timely topic. In 2017, an ACA Working Group drafted Best Practices on Verifying Traceability in the Supply Chain. In the earliest stage of that group's work, the focus was on organic imports. However, it was quickly noted that while import verification brings its own set of questions, challenges such as long and complex supply chains, uncertified handlers, and lack of marketplace transparency also apply to domestic trade. We ask that, while addressing questions related to import oversight, the NOSB not lose sight of domestic challenges.

The rest of our brief comments will focus on reporting of organic acreage. In March of 2018 the ACA surveyed our members to ask about the reporting of organic acreage to the NOP's Organic Integrity Database. During a very short window, responses were gathered from 26 certification agencies.

Key Take-Aways from the Survey:

The largest percentage of respondents (48%) said including production acreage information in the Organic Integrity Database would serve to strengthen global organic control systems. Another 28% said Maybe, and 24% said No. Despite the perceived benefits of acreage

reporting, only 15.38% of agencies said they could readily (within two hours) provide reporting on total organic acreage by crop type and state within a 5% margin of error.

Among those who were unable to provide such reporting, the highest number of respondents said it would take from between one and two years to enable such reporting.

The full survey summary is attached to these comments. The survey will be kept open in order to gather additional feedback on time for oral comments during the spring NOSB meeting.

Thank you again for your work on this topic and for the opportunity to provide comments.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Jennifer Cruse".

Jennifer Cruse
Coordinator

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 9:19:00 AM
Last Modified: Friday, March 23, 2018 9:21:01 AM
Time Spent: 00:02:01

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems? **Yes**

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error? **No**

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error? **No**

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error? **No**

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error? **We could not practically implement such reporting with our current resources.**

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 9:24:07 AM
Last Modified: Friday, March 23, 2018 9:26:44 AM
Time Spent: 00:02:36

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems?

Maybe (Please explain.):
 If the information given was accurate and updated when changed.

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error?

Maybe (Please explain.):
 We are in the process of adding acreage to the database

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error?

No

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error?

No

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error?

Six to twelve months

#3

INCOMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 9:25:39 AM
Last Modified: Friday, March 23, 2018 9:26:52 AM
Time Spent: 00:01:12

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems? **Yes**

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error? **Yes**

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error? **No**

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error? **No**

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error? **Respondent skipped this question**

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 9:23:14 AM
Last Modified: Friday, March 23, 2018 9:27:19 AM
Time Spent: 00:04:04

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems? **No**

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error? **Yes**

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error? **No**

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error? **No**

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error? **We could not practically implement such reporting with our current resources.**

#5

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 9:27:03 AM
Last Modified: Friday, March 23, 2018 9:29:54 AM
Time Spent: 00:02:51

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems? **Yes**

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error? **Maybe (Please explain.):**
 We are pushing producers to report all acreage, but I'm not sure about the 5% margin of error. We can provide it easily, but accuracy is the question.

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error? **Maybe (Please explain.):**
 Again the 5% margin...we are embarking on production type but won't have all the data until the end of the 2018 cycle.

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error? **Yes**

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error? **Respondent skipped this question**

#6

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 9:25:15 AM
Last Modified: Friday, March 23, 2018 9:30:19 AM
Time Spent: 00:05:04

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems? **Yes**

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error? **Maybe (Please explain.):**
It depends on for how many operations info is requested.

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error? **Maybe (Please explain.):**
Since our growers produce so many different crops in small acreages, we report as mixed vegetables.

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error? **Maybe (Please explain.):**
Since our growers produce so many different crops in small acreages, we report as mixed vegetables.

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error? **Uncertain**

#7

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 9:37:02 AM
Last Modified: Friday, March 23, 2018 9:37:49 AM
Time Spent: 00:00:47

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems? **Yes**

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error? **Yes**

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error? **Yes**

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error? **Yes**

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error? **Respondent skipped this question**

#8

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 9:44:21 AM
Last Modified: Friday, March 23, 2018 9:45:10 AM
Time Spent: 00:00:49

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems? **No**

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error? **Yes**

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error? **No**

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error? **No**

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error? **One to two years**

#9

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 9:48:09 AM
Last Modified: Friday, March 23, 2018 9:52:23 AM
Time Spent: 00:04:14

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems?

Maybe (Please explain.):

Depends on the scale of the operation. Multi-cropping diverse polycultures on small-scale operations is difficult to accurately quantify. However, these operations are typically not in question when evaluating traceability.

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error?

No

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error?

No

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error?

No

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error?

Three to six months

#10

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 9:50:44 AM
Last Modified: Friday, March 23, 2018 9:53:53 AM
Time Spent: 00:03:09

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databaseserve to strengthen global organic control systems?

Maybe (Please explain.):

Yield amounts are not guaranteed and greatly impacted by both production practices and environmental factors

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error?

Yes

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error?

No

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error?

No

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error?

One to two years

#11

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 9:57:47 AM
Last Modified: Friday, March 23, 2018 10:05:24 AM
Time Spent: 00:07:36

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems? **Yes**

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error? **Yes**

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error? **Maybe (Please explain.):**
Mixed vegetable production and fruit production is not specific to each crop type

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error? **Maybe (Please explain.):**
Same as above

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error? **Three to six months**

#12

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 9:57:18 AM
Last Modified: Friday, March 23, 2018 10:06:37 AM
Time Spent: 00:09:19

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems?

Maybe (Please explain.):

It would strengthen domestic and export controls. Without similar international systems it would not significantly strengthen controls over imports. Regardless we support moving in this direction.

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error?

Maybe (Please explain.):

We have acreage by field in our database but reports would need to be built. This would not be a priority at this time but rather something we work toward this year. Regarding the next to questions, we don't keep acreage by crop in our data system and that is not something that we could easily achieve.

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error?

No

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error?

No

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error?

One to two years

#13

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 10:20:17 AM
Last Modified: Friday, March 23, 2018 10:22:57 AM
Time Spent: 00:02:39

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems? **No**

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error? **Yes**

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error? **Yes**

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error? **Yes**

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error? **Respondent skipped this question**

#14

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 10:37:07 AM
Last Modified: Friday, March 23, 2018 10:38:39 AM
Time Spent: 00:01:31

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems? **No**

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error? **Yes**

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error? **No**

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error? **No**

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error? **Six to twelve months**

#15

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 10:44:10 AM
Last Modified: Friday, March 23, 2018 10:45:15 AM
Time Spent: 00:01:04

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems? **Yes**

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error? **No**

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error? **No**

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error? **No**

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error? **Less than three months**

#16

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 11:19:30 AM
Last Modified: Friday, March 23, 2018 11:20:37 AM
Time Spent: 00:01:06

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems? **Yes**

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error? **No**

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error? **No**

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error? **No**

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error? **One to two years**

#17

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 11:24:31 AM
Last Modified: Friday, March 23, 2018 11:25:35 AM
Time Spent: 00:01:04

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems? **No**

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error? **No**

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error? **No**

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error? **No**

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error? **One to two years**

#18

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 11:15:06 AM
Last Modified: Friday, March 23, 2018 11:27:14 AM
Time Spent: 00:12:08

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databaseserve to strengthen global organic control systems?

Maybe (Please explain.):

We had one client ask us not to report acres because he thought it put small guys at a disadvantage in terms of pricing or even market access. But I think this should prevent someone fom selling 100,000 bushels when the have acreage to justify say 10,000. I do think there's more fraud at the next level and it might make it easier to do an audit on those buyers if you look at bushels purchased from Farm A and can then go to Farm A on the OID and see their total acres.

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error?

Maybe (Please explain.):

Acreage is reported on all certificates but we don't otherwise store it in a readily retrievable form. Past years when we reported acres to Cathy Greene at ERS it took time to look at each file and enter the numbers and we are bigger. So yes readily, but maybe not in 2 hours at this point. .

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error?

Maybe (Please explain.):

Same as above- yes, readily but maybe not in 2 hours.

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error?

Maybe (Please explain.):

Yes, readily, but maybe not in 2 hours.

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error?

Less than three months

#19

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 11:31:44 AM
Last Modified: Friday, March 23, 2018 11:32:21 AM
Time Spent: 00:00:36

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems? **No**

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error? **No**

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error? **No**

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error? **No**

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error? **We could not practically implement such reporting with our current resources.**

#20

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 12:32:32 PM
Last Modified: Friday, March 23, 2018 12:57:35 PM
Time Spent: 00:25:02

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems?

Respondent skipped this question

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error?

Yes

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error?

Maybe (Please explain.):
 All crops but by types of vegetables due to multiple on a field and multiple plantings in a season

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error?

Maybe (Please explain.):
 All crops but by types of vegetables due to multiple on a field and multiple plantings in a season

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error?

We could not practically implement such reporting with our current resources.

#21

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 2:36:16 PM
Last Modified: Friday, March 23, 2018 2:37:51 PM
Time Spent: 00:01:35

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems? **Yes**

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error? **Yes**

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error? **No**

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error? **No**

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error? **Less than three months**

#22

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 2:59:26 PM
Last Modified: Friday, March 23, 2018 3:03:20 PM
Time Spent: 00:03:54

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems? **Yes**

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error? **No**

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error? **No**

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error? **No**

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error? **We could not practically implement such reporting with our current resources.**

#23

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, March 23, 2018 3:29:48 PM
Last Modified: Friday, March 23, 2018 3:54:03 PM
Time Spent: 00:24:14

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems?

Maybe (Please explain.):

We currently provide the information to Integrity for crop producers but needing that information has never come up when we are reviewing OSP's.

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error?

No

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error?

No

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error?

No

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error?

Uncertain

#24

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, March 26, 2018 12:09:17 PM
Last Modified: Tuesday, March 27, 2018 11:36:24 AM
Time Spent: 23:27:06

Page 1: Discussion Document: Import Oversight

Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems?

Maybe (Please explain.):

Providing production acreage information might strengthen organic control systems, but it could also cause confusion depending on the frequency of updates and the ability to see historical information. This would be most apparent with storage crops where the field--and corresponding acreage information--would be rotated to a different crop prior to sale of the storage crop.

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error?

Yes

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error?

Yes

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error?

Yes

Page 2: Last Question

Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error?

Uncertain

#25

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, March 27, 2018 12:14:57 PM
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Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems? **Yes**

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error? **No**

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error? **No**

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error? **No**

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Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error? **One to two years**

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Collector: Web Link 1 (Web Link)
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Q1 Would including production acreage information in the National Organic Program Organic Integrity Databases serve to strengthen global organic control systems? **Yes**

Q2 Given current resources, could your organization readily (within 2 hours) provide reporting on total organic acreage within a 5% margin of error? **Yes**

Q3 Given current resources, could your organization readily (within 2 hours) report on organic acreage by crop type within a 5% margin of error? **Maybe (Please explain.):**
It would take longer than 2 hours

Q4 Given current resources, could your organization readily (within 2 hours) report on total organic acreage by crop type and by state within a 5% margin of error? **Maybe (Please explain.):**
Yes, however it would take longer than 2 hours

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Q5 What amount of time would be sufficient to put into place a system that would enable you to readily (within 2 hours) report on crop acreage by crop type and state within a 5% margin of error? **Less than three months**