

Supporting Statement - Part A

**Nursery and Christmas Tree Production Survey
and
Nursery and Floriculture Chemical Use Survey**

OMB No. 0535-0244

A. JUSTIFICATION

This statement covers two triennial surveys, the Nursery and Christmas Tree Production Survey and the Nursery and Floriculture Chemical Use Survey. They will be conducted in early 2010 in conjunction with the current annual Floriculture Production Survey, OMB #0535-0093. This statement also covers the Congressionally funded annual Nursery and Greenhouse Survey in Oregon, along with the biennial Oregon Christmas Tree Survey which is conducted in odd-numbered years. (The nursery industry is Oregon's leading agricultural industry.) The only major change to these surveys is the change to being done every 3 years instead of every 2 years.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

In February 1997, the Secretary of Agriculture issued the report of the Civil Rights Action Team entitled A Civil Rights at the Department of Agriculture. Civil Rights Implementation Teams were subsequently formed to implement the report recommendations. One of the recommendations that was a direct outcome of the evaluation of this report was the addressing of the conditions of farm workers. The Implementation Team recognized the need for reliable pesticide use information about enterprises that involve farm workers and requested that the National Agricultural Statistics Service (NASS) obtain pesticide use information for commodities which required intensive farm labor. Consequently, Congress appropriated funds for the collection of pesticide use data on nursery and floriculture operations. This chemical data will expand the existing NASS pesticide use database which contains comprehensive annual pesticide use reports as mandated in the 1990 and 1996 farm legislation.

There is currently a corresponding production survey for floriculture operations but there is no measure of the production of nursery and greenhouse commodities except for the agricultural census every 10 years. The 1998 Census of Horticultural Specialties revealed that the industry grew from \$4.8 billion to \$10.6 billion during that 10 year period. NASS therefore incorporated triennial nursery production statistics into the NASS estimating program to measure the nursery industry's growing significance to the agriculture economy and also provide a link to the collection of chemical use data.

General authority for these data collection activities is granted under U.S. Code Title 7, Section 2204 ([attachment A](#)) which specifies that "The Secretary of Agriculture shall procure and preserve all information concerning agriculture which he can obtain ... by the collection of statistics ... and shall distribute them among agriculturists."

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

Nursery and Christmas tree production data and nursery and floriculture chemical use data will be used by NASS, the Environmental Protection Agency, the nursery and floriculture industries, and other parties to assess the environmental and economic impact of various programs, policies, and procedures on nursery and floriculture operators and workers. The basic chemical use and farm practices information also will be used to enhance the national chemical use database maintained by NASS. This database is an integral source of data necessary for on-going risk assessments related to dietary exposure to chemicals, worker safety, water quality, and ecological resources.

The nursery and greenhouse industry had total sales in 2005 just over \$16,201,800,000 and is ranked third in U.S. crop cash receipts in 2005; in thirty States it is in the top five. Accurate production data will aid in determining the needs of growers, such as appropriation of research funds to target pests and diseases. Producers can better determine which crops to grow and profit from by knowing total production and crop sales intentions. Economists and researchers will be better equipped to estimate the economic impact of the industry on the U.S. economy. Since significant problems are encountered in finding adequate labor for these operations, the data collected will be relied upon when Congress considers minimum wage and migrant workers issues. Information learned will also be useful when decisions must be made regarding the economic impact on domestic producers when importers enter the U.S. market.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

Web-based data reporting has been implemented for most of the NASS information collections (a small number will be impractical or otherwise unsuitable). The Nursery and Christmas Tree Production Survey is scheduled to be converted to web-based data collection by the next data collection period in 2010. The Nursery and Floriculture Chemical Use Survey is one of those surveys that it is impractical to be converted to web based data collection due to the complexity of the questionnaire.

- 4. Describe efforts to identify duplication.**

NASS is very careful not to duplicate work planned by other Government agencies. NASS Field Offices were contacted and asked to document any State programs that overlap with the surveys contained in this docket. NASS is making every attempt to use existing data and only ask additional questions that are needed. Internal committees within USDA that include NASS, the Economic Research Service, the Agricultural Marketing Service, the Agricultural Research Service, Cooperative State Research Education and Extension Service, and the Natural Resource and Conservation Service have been formed to help coordinate all aspects of these data collection efforts. USDA's Office of Pesticide Management Policy provides coordination and oversight for the Department with EPA. The NASS Advisory Committee on Agricultural Statistics,

appointed by the Secretary of Agriculture, also provided advice on this program area. This committee is composed of a diverse representation of experts from private industry, government, and universities.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The design of the Nursery Production Survey allows for the minimum amount of data to be collected from smaller operations. Nursery operations with sales of \$10,000 to \$100,000 will be asked only for value of sales, area in production, and a few basic labor questions. Detailed production data will be collected only from operations with sales greater than \$100,000.

Chemical data will be collected from operations with sales greater than \$10,000 and which will be sub-sampled for the Nursery and Floriculture Chemical Use Survey from either the Nursery and Christmas Tree Production Survey or the Commercial Floriculture Survey.

NASS tries to identify those data items absolutely necessary to answer the needs of data users. Information requested on these surveys may require respondents to refer to their records for the answers. To minimize the interview time, branching is used throughout the questionnaires to skip those sections not applicable to particular respondents. Enumerators also attend State training schools for instruction and practice on using the questionnaires. Data collection for these surveys is coordinated with other surveys to minimize contacts with respondents. Field enumerators are trained to collect the chemical data from the respondent's own records. This allows the operator to return to work while much of the data is being collected. Once all of the chemical records have been recorded the enumerator will meet with the respondent again to collect some on the overall operation of the business.

NASS has a working group currently developing a respondent burden management tracking system to monitor respondent burden across surveys. The processing system being developed by this team will further refine sampling procedures and management of surveys. NASS continues to conduct research on potentially new sampling and data modeling strategies to reduce data requirements and respondent burden.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

NASS is charged with the responsibility of providing the Secretary of Agriculture, the Congress, the Executive Branch, farm groups, and the public with reliable, up-to-date information concerning the Nation's farms and ranches. The Nursery and Christmas Tree Production Survey and the Floriculture and Nursery Chemical Use Survey will be conducted every 3 years to help provide a complete picture of this agricultural sector.

The inclusion of floriculture and nursery chemical use into the chemical use database is needed to answer fundamental questions about the safety of our Nation's water supplies and potential worker exposure. Sound policy decisions cannot be made without reliable, unbiased data. NASS feels an adequate database can be constructed by conducting these surveys every three years. Without timely, real world data on chemical use, EPA

will be forced to make worse case assumptions in their chemical risk assessments. Collecting economic data is critical to the mission of USDA, Congress, other governmental agencies, and the private sector. NASS itself will use these data to estimate cash receipts.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner requiring respondents to report information to the agency more often than quarterly; requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;...**

There are no special circumstances associated with this survey.

- 8. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

The Federal Register Notice soliciting comments was published on May 15, 2007, on pages 27284-27285. One comment was received and is attached to this document.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Other USDA agencies, other Federal Departments, and State Departments of Agriculture along with the Society of American Florists (SAF) and the American Nursery and Landscape Association (AN&LA) have been consulted and they have contributed to the content of both the Nursery Production Survey and the Floriculture and Nursery Chemical Use Survey.

- 9. Explain any decision to provide any payment or gift to respondents.**

There are no payments or gifts to respondents.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

All questionnaires include a statement that individual reports are kept confidential. U.S. Code Title 18, Section 1905 and U.S. Code Title 7, Section 2276 ([attachment B](#)) provide for the confidentiality of reported information. All employees of NASS and all enumerators hired and supervised under a cooperative agreement with the National Association of State Departments of Agriculture must read the regulations and sign a statement of compliance. (Privacy Impact Statement is in [attachment C](#).)

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

Below are estimates of burden hours for the Nursery and Christmas Tree Production Survey, Floriculture and Nursery Chemical Use Survey, Oregon Christmas Tree Production Survey, and Oregon Nursery and Greenhouse Survey. Interview lengths and response rates are from the most recently completed surveys.

**Projected Annual Response Burden for
Nursery and Christmas Tree Production Survey (NCTPS),
Nursery and Floriculture Chemical Use Survey (NFCUS), and
Commercial Floriculture Survey (CFS)**

Survey Name	Sample Size	Freq	Responses				Non-response				Total Burden Hours
			Resp. Count	Freq x Count	Min./ Resp.	Burden Hours	Nonrsp Count	Freq. x Count	Min./ Nonr	Burden Hours	
Advance Letters											
NCTPS ^{1/}	9,211	0.3	7,370	2,211	6	221	1,841	552	1	9	230
NFCUS ^{3/}	3,703	0.3	2,770	831	6	83	933	280	1	5	88
NCTPS & NFCUS	2,334	0.3	1,750	525	6	53	584	175	1	3	56
CFS ^{2/}	4,116	1	3,300	3,300	6	330	816	816	1	14	344
CFS & NFCUS	1,856	0.3	1,390	417	6	42	466	140	1	2	44
Subtotal	17,104		13,280	3,984	24	399	3,824	1,147		19	418
Mail Survey											
NCTPS ^{1/}	9,211	0.3	7,370	2,211	35	1,290	1,841	552	1	9	1,299
CFS ^{2/}	4,116	1.0	3,300	3,300	35	1,925	816	816	1	14	1,939
Subtotal	9,211		7,370	2,211		1,290	1,841	552		9	1,299
Enumerated Survey ^{4/}											
NCTPS ^{1/}	5,500	0.3	4,400	1,320	35	770	1,100	330	1	6	776
NFCUS ^{3/ 7/}	3,703	0.3	2,770	831	60	831	933	280	1	5	836
CFS ^{2/}	4,000	1.0	3,200	3,200	35	1,867	800	800	1	13	1,880
Subtotal	9,203		7,170	2,151		1,601	2,033	610		11	1,612
Oregon Nursery Survey ^{5/}	780	1.0	700	700	30	350	80	80	1	1	351
Oregon Christmas Tree Survey ^{6/}	990	0.5	750	375	20	125	240	120	1	2	127
Total	37,288		29,270	9,421		3,765	8,018	2,509		42	3,807
Frequency			0.321865				0.312921				

- ^{1/} The questionnaire is mailed to the nursery operations that were not selected for the NFCUS.
- ^{2/} Commercial Floriculture Production Survey burden is accounted for under the OMB # 0535-0093; the CFS numbers in yellow above are for reference only and are excluded from totals.
- ^{3/} The Nursery and Floriculture Chemical Use Survey is a sub-sample of the Nursery Production Survey in this docket and the Commercial Floriculture Survey (OMB# 0535-0093).
- ^{4/} Operations that were selected for both surveys will be conducted in person only.
- ^{5/} The Oregon Nursery Survey is conducted annually.
- ^{6/} The Oregon Christmas Tree Survey is conducted in odd-numbered years.
- ^{7/} The Nursery and Floriculture Chemical Use Survey sample will be by personal enumeration only.

Cost to the public for completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. Average annual reporting time of 3,807 hours are multiplied by \$24 per hour (estimated rate for business supervisor), for a total annual cost to the public of \$91,368.

13. Provide an estimate of the total annual cost burden to respondents.

There is no cost burden to respondents.

14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses (equipment, overhead, printing, and staff), and any other expense that would not have been incurred without this collection of information.

The total yearly cost to the Federal Government is approximately \$1.6 million, for enumeration and other personnel costs, travel, training, data processing, printing, telephone, and postage.

15. Explain the reasons for any program changes or adjustments reported (reasons for changes in burden).

The total annual burden will result in a net decrease of 3,245 hours. This decrease is due to several changes. There will be a program increase of 127 hours due to the addition of the Oregon Christmas Tree Production Survey which is conducted only in odd numbered years. There will be a program decrease of 3,679 hours due the change in frequency of the Nursery and Christmas Tree Production Survey and the Nursery and Floriculture Chemical Use Survey from every other year to every third year. There will be an adjustment increase of 707 hours due to the change in average length of time it takes to complete the Nursery and Floriculture Chemical Use Survey (from 45 minutes to 1 hour per questionnaire); based on actual data from the most recent survey cycle. Finally, there will be an adjustment decrease of 400 hours due to the reduction in projected sample sizes.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Survey Schedules				
Data Year	Survey	Begin Data Collection	Conduct Analysis	Publish
2007	Floriculture Production ^{1/}	Jan 2008	Mar 2008	Apr 2008
	Oregon Nursery Survey	June - July 2008	July - Aug 2008	Aug 2008
	Oregon Christmas Tree Survey	Mar - May 2008	June - Aug 2008	Sept 2008
2008	Floriculture Production ^{1/}	Jan 2009	Mar 2009	Apr 2009
	Oregon Nursery Survey	June - July 2009	July - Aug 2009	Aug 2009
2009	Floriculture Production ^{1/}	Jan 2010	Mar 2010	Apr 2010
	Nursery Production ^{2/}	Jan 2010	May 2010	July 2010
	Nursery and Floriculture Chemical Use ^{2/}	Jan 2010	Jun - Aug 2010	Sept 2010
	Oregon Nursery Survey	June - July 2010	July - Aug 2010	Aug 2010
	Oregon Christmas Tree Survey	Mar - May 2010	June - Aug 2010	Sept 2010

^{1/} Separate OMB docket #0535-0093. Data collection can begin Dec. 1 for seasonal operations that have closed down for the winter. All other operations will be contacted starting Jan. 2.

^{2/} Data collection can begin Dec. 1 for seasonal operations that have closed down for the winter. All other operations will be contacted starting Jan. 2.

Nursery and Floriculture Chemical Use Survey results are published after each triennial survey. The publication name will be *Agricultural Chemical Usage - 2006 Nursery and Floriculture Summary* and will be released approximately 5 months after the completion of the data collection. The nursery production publication will include State-level data for the 17 States in the program. Categories to be collected are: transplants for commercial vegetable and strawberry production, propagative nursery materials, broadleaf evergreens, coniferous evergreens, deciduous shade trees, deciduous flowering trees, deciduous shrubs, fruit and nut plants, Christmas trees, palms, ornamental grasses, and other woody ornamentals and vines. Items published for all categories, except transplants and propagation, include inventory numbers, gross sales for year 2009, the percentage of those sales that were wholesale, the category each plant was in at the time of sale (bare root, balled and burlapped, container grown or other) and the inventory numbers for January 1, 2010. Published items for transplants and propagation materials will be gross sales for 2009 and what percent of those sales were wholesale. Hired labor numbers, full-time and part-time, will be collected and published for all respondents with \$10,000 or more in gross sales.

Nursery and Christmas Tree Production Survey results are published after each triennial survey. The publication name will be *Nursery Crops* and will be released approximately 2 months after the completion of the data collection. Key data items collected and published for the Nursery and Floriculture Chemical Use Survey will include products

applied, where applied, amount applied, method of application, number of applications, and who made applications. In addition, several pest management questions related to practices of nursery and greenhouse producers will be asked

These two publications are available on-line immediately after release at http://www.nass.usda.gov/Statistics_by_Subject/index.asp

Oregon Nursery Survey results are published after each annual survey. The publication name will be the *Oregon Nursery and Greenhouse Survey* and will be published in August of every year. Oregon Christmas Tree Survey results are published after each biennial survey. The publication name will be the *Oregon Christmas Tree Survey* and will be published in September of every other year. The results of both Oregon surveys will be published at <http://www.nass.usda.gov/OR>.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

There is no request for approval of non-display of the expiration date.

18. Explain each exception to the certification statement identified in Item 19, ACertification for Paperwork Reduction Act Submissions@ of OMB Form 83-I.

There are no exceptions to the certification statement.

July 2007