

United States Department of Agriculture

National Agricultural Statistics Service Census and Survey Division Survey Administration Branch



June 11, 2008

TO: Ray S. McAllister

Regulatory Science and Policy Leader

CropLife America

FROM: NASS Clearance Officer

U.S. Department of Agriculture Room 5336A, Mail Stop 2024-S 1400 Independence Avenue Washington, DC 20250-2024

RE: Notice of Intent to Seek Approval to Revise and Extend an Information Collection - 73 FR 11613; March 4, 2008; Docket No. 0535-0218.

Thank you for your response to the Federal Register Notice regarding the National Agricultural Statistics Service (NASS) agricultural chemical use data collection program. USDA and NASS are committed to providing timely, accurate, and useful statistics in service to U.S. agriculture. However, limited resources – combined with escalating survey expenses and increasing staff costs – have eroded NASS's annual survey budget over the last decade. This resulted in necessary adjustments to NASS programs, including a decision to collect chemical use data on a rotational basis.

In fiscal years (FY) 2004 through 2006, NASS received appropriated funding from Congress to support existing programs. Some of these funds were used to continue the rotation pattern for chemical use statistics. However, additional program reductions were necessary to ensure high quality statistics were being produced for all reports published by NASS.

NASS reviewed and prioritized its entire data collection program based on the following criteria:

- Principal Economic Indicator data;
- Data that directly impact the market;
- Data necessary to implement USDA programs that provide payments to farmers and are used to administer the farm safety net for producers; and
- Data for which there are no other sources of information available.

Based on the need to redirect funds in accordance with the priority listing above, the decision was made to further curtail the NASS chemical use program beginning in FY 2007. Current funding will only allow a very limited number of commodities to be surveyed each year. Current plans are to be able to collect data for specific crops every 5 or 6 years. Many other commodities will be much less frequent.

NASS will not conduct any agricultural chemical usage surveys on crops produced in 2008. However, under a cooperative agreement with the USDA Economic Research Service, NASS plans to collect wheat nutrient and pesticide data as part of the 2009 Agricultural Resource Management Survey Phase II and plans to publish this data in May 2010.

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NASS is committed to working with the agricultural community to identify funding sources and in the absence of increased funding, set commodity rotation priorities for future limited surveys. To expedite reinstatement of the NASS chemical use data collection program, in OMB Docket No. 0535-0218 NASS, requests approval to restart the program should funding become available. Contingent start-up plans include restarting the program with fruit and postharvest regardless of historical even/odd year rotation of the fruit and vegetables chemical use program.

Once OMB publishes the information packet, it will be available for public comment for 30 days. During this time the supporting statements and other documents can be viewed on the internet at: http://www.reginfo.gov/public/do/PRAMain (see more detailed access instructions at end of this letter).

The ARMS Phase II is the primary data collection vehicle for the Field Crops Chemical Use report. Some of the data are collected via a cooperative agreement with the USDA Economic Research Service (ERS) and some collected data are funded solely by NASS. In 2008, the ERS did not require Chemical Use data due to mix of commodity rotations. This is unprecedented and in 2009 commodity rotations will continue to require collection of chemical use data - which NASS will publish. The ERS commodity rotations primarily involve field crops but, are not specifically limited to field crops. In 2007, apples and organic apples were selected by ERS. NASS will continue to cooperate with ERS to publish aggregate results as available from chemical use data collected for purposes of the Agricultural Resources Management program.

OMB Docket Information Collection Request (ICR) packet access instructions for review during second public comment period.

From the Internet at: http://www.reginfo.gov/public/do/PRAMain:

- 1) Under the second drop-down box, select Department of Agriculture then, click the submit button. All USDA dockets that are currently under review will be displayed.
- 2) Scroll down to find OMB Docket No. 0535-0218, click on the number. This will bring up all requests submitted under this OMB control number.

3)	Click on the ICR item(s) to review.	Reference No.	for the first item.	This will enable selection	of the