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Good Afternoon David,

My responses to your comments can be found in the red text below.

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Here are my comments. Thanks for the opportunity. Do you have any plan for how often an organic survey will be fielded? Will this replace the collection of certifier data that Cathy Greene at ERS tries to do?

For the 2011 Certified Organic Production Survey we are partnering with the Risk Management Agency (RMA). If this "pilot" survey is accepted in the organic community and the need is there for more data, we will continue this program as long as we get additional organic funding. This survey will not replace the data that Cathy Greene at ERS is gathering.

NASS 2011 organic survey

Comments - David Granatstein, Washington State University granats@wsu.edu

Section 1 Q2.

 Acres. Specific total acres (org and non organic). Include all land (forest, etc.) or only agricultural land?

Include all acreage owned by the operation. This includes organic, non-organic, forest, etc. These questions are asked to get the respondent to focus on the acres on his/her operation. Question 4 will then ask, "Of the total acres operated in Item 3, how many acres were: "Certified Organic Cropland" and/or "Certified Organic Pastureland and/or Rangeland". The acres throughout the rest of the questionnaire will be directed to these certified organic acres. An include statement (Please report all land including organic and conventional acres) was also added to this question.

Section 2 Q3.

 Why are varieties like Red Delicious and Golden Delicious excluded? These represent 2500 acres certified in Washington State.

After receiving feedback on this section from apple growers, other USDA agencies, State Departments of Ag, researchers, and other concerned apple data users, we have included 23 apple varieties on the questionnaire. An "Other" variety is also available for varieties not listed. Red Delicious and Golden Delicious were both added.

How will the grower answer the sales question as a good portion of their apples may not yet be sold at the time the survey is administered? This is a huge potential source of error. Should you request 2010 sales for any crops that are stored (fruit, frozen veg, grain, etc)?

This is a great point and one that has been discussed thoroughly since we initially began working on this project. We are looking for crops harvested and sold in 2011. Washington apples are unique in that they are usually harvested and sent to storage to be marketed and sold in the upcoming year. Due to this, we changed the question around to "Include production that was sold and that will be sold". Operations would need to estimate for the "that will be sold" gross value.

 Is the gross value the FOB price at the packing house, or the gross return to the grower after storage and packing charges? Again, the fruit might be sold by the survey date but no payment made to the grower as that fruit is part of a larger pool for which payment is not made until all of it is sold.

Prices for fresh fruit are the average prices producers receive at the point of first sale. This is commonly referred to as the average price as sold. Since the point of first sale is not the same for all producers, prices for the various methods of sale are weighted by the quantity sold. For example, in a given State, part of the fruit is sold free on board (F.O.B.) packed by growers, part is sold as bulk fruit at the packinghouse door, and some is sold retail at roadside stands. The fresh fruit average price as sold is a weighted average of the average price for each method of sale. The exception is fresh fruit sales in California, Washington, and New York (apples only) which are equivalent returns at packinghouse door. The equivalent packinghouse returns represent adjusted prices.

F.O.B. packed prices are adjusted to an equivalent incoming packinghouse door price by subtracting all costs that accumulate between the incoming packinghouse door and the F.O.B. price. These costs include grading, packing, inspecting fees, selling, and other costs.

Section 4 Q2.

• Exclude any production for value added made on this operation. I can think of a large berry grower that has organic and conventional, and has a processing plant on the farm. I can't see that this production is accounted for elsewhere in the survey, thus this will create error in the results.

We are partnering with RMA on this pilot survey and our main goal of this survey is to get a "true" organic only price by commodity. This operation would be able

to report acres harvested and quantity harvested. They would not be able to report a quantity or value sold in this section. This would cause an inaccurate price if they were to put in a value. To fix this problem, we changed the exclude statement to say, "Exclude from both Quantity Sold and Gross Value Sold, any production used to make value added products on this operation. Report value-added products and sales in Section 9, Item 2."

Section 9, Item 2 asks "Did this operation produce and market any Processed or Value-Added products from its own organic agricultural production (ex. bottled milk, cheese, processed meat, flour, wine, jam, jelly, etc.)? Do not include sales reported in previous sections.

 Other fruit to include in the table: apricot, nectarines, kiwi, pomegranate, pineapple.

The commodities listed above are minor commodities that are produced regionally throughout the U.S. NASS has strict publication standards and it is usually very difficult to publish data with these constraints. We plan to capture these commodities in the "Other Fruits" category. During our review, we will analyze these commodities and use the results to decide if we should add them in future surveys.

Section 5 Q2.

How will people who grow diverse mixed greens answer this? Often these
include mustard types, etc. that clearly are not lettuce. Do you want a clear
category?

These commodities would go under "Other Vegetables" for the 2011 questionnaire. During our review, we will analyze these commodities and use the results to decide if we should add them in future surveys.

Section 6 Q2.

• Add alfalfa hay, triticale to list. Or maybe small grain hay.

Alfalfa and Alfalfa Mixtures for dry hay will be added to the questionnaire. The other commodities will not be added at this time.

Section 9 Conclusion.

 What about a question regarding plans for future production? Increase, decrease, stay the same, exit organic production, exit farming. Or include such a question in each commodity section so growth or shrinkage of supply trends could be more specific.

Good suggestion but due to space constraints we can't fit it on at this time. We will keep this in mind for future projects.

Other crops that are not included:

Hops

Vegetable seed crops – this could be very helpful to break out Nursery crops

Farmers will need to report Hops under "Other Field Crops" and Vegetable Seed Crops under "Other Vegetables". During our review, we will analyze these commodities and use the results to decide if we should add them in future surveys.

The Floriculture and Nursery Section was removed from the 2011 survey. We discussed this section but based on feedback from our stakeholders we opted not to include it at this time.

We did, however, decide to add maple syrup back to the questionnaire. Depending on future organic funding, if more organic floriculture and nursery data is warranted, we can add this section back on for future surveys.

Is the survey fielded by mail or in person?

The survey will be mailed in early December and then again in early January. Phone follow up will take place towards the end of January for non-response. If response rates have not met our 80% response rate, we will then do field follow up.

The survey is called "voluntary." What does this do to response rate?

Great question. The 2008 Organic Production Survey (OPS) was a follow on survey to the Census of Agriculture, which was required by law. The 2011 Certified Organic Production Survey is not under the Census of Agriculture OMB Docket so we can only tell respondents that their response is voluntary, but with all NASS surveys we aim for an 80% response rate.

We have an organic statistics web site where we track the data for Washington and Oregon each year. There may be some helpful examples here. http://csanr.wsu.edu/pages/Organic Statistics

There is a lot of good data on this site. Keep up the good work.

Thanks for looking over the questionnaire and taking the time to provide feedback.