

(Reply to Elizabeth Kirby)

Good afternoon Elizabeth,

My responses to your questions below are in the red font.

Thanks for looking over the questionnaire and if you have any questions or concerns, please let me know.

Have a great day.

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#### COMMENTS ON NASS 2011 ORGANIC PRODUCTION SURVEY FORM

3/25/11

Elizabeth Kirby

Response to 2008 survey was **required by law**. I am wondering about reason to go with **voluntary** response for 2011 and if there will be some way to determine percent response of producers, especially by crop type. This will definitely affect value of survey. The 2008 and 2011 surveys will not be comparable for trends. I expect many producers will not respond if voluntary. Is this decision still open to discussion?

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. Unfortunately, this is not open for discussion. The surveys will be comparable for certified organic acres harvested, certified organic production, and total certified organic value of sales.

**Sec.1.** Having **exempt category information** collected in the 2008 survey was valuable to get a read on how many farms of this category there are and what proportion of total organic sales and organic area they represented. For example, here in Washington there are many exempt producers. The statistics we provide annually are based only on certifier information. The 2008 OPS allowed us to know that although there are many additional exempt farms, the exempt organic acreage and sales were a small proportion as compared to certified producers. However, there has always been requests for information on the exempt farms as they create a unique demographic and this info is important to small farms programs.

It would be valuable for survey to once again address exempt producer information. If exempt information is surveyed, I would suggest that total acres question as it was in the 2008 Sec 1 Q.

2 have separate boxes for certified and for exempt. Maybe categorizing exempt crops is not as important. But it would be valuable to at least have total exempt farm numbers and production area (harvested acres?) numbers.

This is a Certified Organic only survey. The sample used for this survey is operations that are USDA Certified Organic. The exempt farmers/ranchers make up an important part of the organic industry but for this survey we are not collecting data on these operations.

## Sec.2.

**2.a** This will be great info to have. Most of the certifier data provided to us has not been segregated by bearing or non bearing acres and this could shed some light on whether acres coming in to bearing are part of the reason that sales volume of apples has increased in WA even though certified acres has decreased a bit.

**2.b** include boxes as unit?

This has been incorporated into the "units" column.

**2.c.** Looks like this question may not lead to getting real value for an entire market year of apples. May be better to ask for previous year actual gross sales and then also the estimated sales for the current year crop. This will affect all the crops that have a significant amount go to storage prior to sale and was a problem with how sales were collected in the 2007 Census of Ag where the Question 4 was worded as follows: "- Q4. What was the total value of sales for **crops produced and sold as organic** by this operation in 2007? Verifying with NASS staff that the interpretation of this was to include sales **only** for crops both produced and sold in same year, this would have left out a significant portion of actual value for many crops, not just apple and pear.

There needs to be a well worded section that makes sure we are getting total value. As that is not available for many crops, may be best to ask for market year value.

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.

I don't remember off hand how this was phrased in the 2008 OPS and how the directions explained it.

In 2008, apples were included in the Organic Vegetables, Fruits, Tree Nuts, and Berries Section. The section was similar to the current Other Certified Organic Fruits, Tree Nuts, and Berries Section but it only asked for Acres Harvested, Total Quantity Harvested, and Gross Value of Sales in 2008.

**2.c.** Could potentially further segregate processed to:  
- fresh slice market

- peelers
- juice

Good suggestion but additional funding would be needed to further break out processed apples.

**Sec. 2.**

I am not clear on why a few of these particular varieties were chosen over others. The variety choices look good for the most part. However, I wonder about having both Gala and Royal Gala as options - I believe Royal Gala is a sport of Gala and there are many other cvs/sports of Gala, many of which are more prevalent than the Royal at least here in Washington which does have the majority of the organic apple acres. I suggest leaving out Royal Gala on this section, and maybe adding a note for respondents to include all cvs/sports of Gala under the sole Gala variety category.

I would also suggest including options for Red Delicious, Granny Smith, and Golden Delicious. Cameo has not been as large a portion for Washington apple growers – but I would keep it on the list as it has been growing over the years.

Currently Gala and Fuji cultivars make up around 40% of all reported WA certified organic apple acres (over 3,000 ac each);

2010 Acres and share of Washington certified organic apples

Gala	21.6%
Fuji	22.9%
Granny Smith	10.0%
Red Delicious	9.9%
Golden Delicious	6.7%
Braeburn	6.0%
Cripps Pink/Pink Lady	6.9%
Honeycrisp	7.5%
Cameo	3.1%
Pinova/Corail®/Pinata!™/Sonata™	1.3%
Jonagold	1.0%
Others	3.1%
Organic apple acres	14,800

We have seen very little or no acreage in Crispin, Macoun, or Sommerfeld. However, if they have high importance in other regions it may be of value to leave those in the options. However, it seems that Liberty or others might be of more importance to other regions? Best to talk to folks in the Midwest and the Northeast (such as Ian Merwin, Greg Peck) to see what would be of most value to be tracked for those regions.

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.

**3.a.** as in 2.a. include boxes as unit?

This section has been removed since we added more apple varieties.

**3.c.** as in **2.c.** Could potentially further segregate processed to:

- fresh slice market
- peelers
- juice

This section has been removed since we added more apple varieties.

Sec.4.

Expansion of fruit code pick list:

- Apricot and Nectarine, (both increasing area in WA, not sure about CA),
- clarify if pluots should go under plums and prunes and if and apriums should go with apricots (if added) or if they should go under other,
- Pomegranates – approx. 1,500 ac in CA in 2009
- Kiwi
- Persimmon
- What about capturing limes and mandarins etc – would an “other citrus” category work?

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.

Expansion of tree nuts list to include

- **Almonds** (nearly 6000 acres in CA in 2009?) one of most important along with pecans and walnuts
- Chestnuts? minor

Almonds, pecans and English Walnuts are already listed on the questionnaire. Chestnuts are also considered a minor commodity. The growers can report this commodity under the “Other Nuts” category. During our review, we will analyze this commodity and use the results to decide if we should add chestnuts in future surveys.

Expansion of berries list to include

- raspberries (more important than cranberries, for example). Also maybe include examples of boysenberries etc to go under blackberries etc.

Raspberries are already included on the questionnaire. Boysenberries are grown regionally and considered a minor commodity. The growers can report this commodity under the “Other Berries” category. During our review, we will analyze this commodity and use the results to decide if we should add boysenberries in future surveys.

**Sec 5** Would like to see fresh versus processing acres for vegetable categories such as sweet corn, peas, green/snap beans and potatoes, tomatoes.

Seeing the breakouts between fresh and processing acres would be very beneficial and interesting to see but additional funding would be needed to gather this data.

**5.2** I would like to see a section on vegetable seed crops – as the vegetables (ex beet) are not harvested for vegetables and the harvested acreage is going to often be on a bi-annual cycle – Where are these acres supposed to be reported at this time - is it meant to go under field crops, other? We do have inquiries every year about organic vegetable production and supply, so that would be of value to include, with individual identifier numbers for each type of veg seed crop.

We have found it very useful to have a Mixed Salad Greens designation as so many producers are using mixes and those mixes often include mustards etc. as well as lettuce so those acres are difficult to fit into a more specific 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.

**Sec. 6.2.** It would be valuable to *at least* segregate **Alfalfa** from **Hay** (All dry hay) as markets are different. Suggested future hay categories include:

- **Alfalfa** hay,
- Mixed alfalfa hay, (?)
- Small grain hay
- Grass hay , and maybe
- Mixed grass hay

The small grain hay would be so helpful to improve the picture of this sector. Often times the detail offered by the certifier does not distinguish use of small grains for grain, seed or hay. We need more info!

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

I feel that reporting potatoes in section 5 vegetables, rather than under field crops, is appropriate even though the USDA ERS have potatoes on “Other crops” tables. Working with Helga Willer on international organic statistics we have also seen potatoes listed in an alternative “Root crops” category which includes such crops as yams, cassava, taro and sweet potato etc.

## **6.2 Crop Pick list**

**Wheat:** I do not think that “Winter wheat” is the best wheat classification to use. What would be more valuable, at least from my viewpoint and a market viewpoint, would be whether the wheat is hard red, hard white or soft white, soft red, durum etc.. Using winter wheat will lead to confused reporting of classes - for example, Soft White Wheat, will be reported under both “winter wheat” (dep. on variety) and/ or “Other Wheat” crops (if spring variety).

It would be worth improving the reporting choices for wheat – it has been very difficult to get a picture of organic grain production because it is reported so many different ways from certifiers. Same with corn etc., so I am happy to see the use (grain or silage) information being collected again.

Asking the different wheat classifications will make it difficult to publish by class since we are only sampling certified organic growers.

Add hops here? Organic hops, although of minor area, is a growing industry in Washington and Oregon –

Farmers will need to report Hops under “Other Field Crops”. During our review, we will analyze this commodity and use the results to decide if we should add hops in future surveys.

Other comments:

Wondering why the section 4 in the 2008 OPS is not included in 2011 draft. I assume that it is because it was a small section and less important – what has the discussion on this been?

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.

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