



United States Department of Agriculture
National Agricultural Statistics Service



May 29, 2019

Amalie Lipstreu

Dear Ms. Lipstreu,

Thank you for your recent letter concerning the renewal of the Organic Survey. The primary functions of the National Agricultural Statistics Service (NASS) are to prepare and issue State and national estimates of crop and livestock production, disposition, and prices and to collect information on related environmental and economic factors, whole farm characteristics, and operator demographics. Timely, reliable, and detailed statistics help maintain a stable economic atmosphere and reduce risk for production, marketing, and distribution operations. NASS is the primary data collection Agency of the US Dept. of Agriculture.

The content of the Organic Survey has been developed over the years at the request of numerous data users, including, but not limited to: Risk Management Agency, Federal Crop Insurance Corporation, Agricultural Marketing Service, Economic Research Service, Natural Resource and Conservation Service and many others. NASS has been conducting cognitive interviews in the larger organic producing states looking for ways to improve the questionnaire. NASS is also looking for ways to streamline the questionnaire to reduce respondent burden and data collection costs, while still providing data users with the detailed data they need.

Recommendation 1: This survey product should be conducted as a mandatory organic survey every five years as a follow on to the Census of Agriculture on an ongoing basis to inform the industry in the near-term and to allow for longitudinal analysis.

Reply: This survey was conducted by NASS in 2009, 2015 and 2020 it will be conducted again. In all three of these years the survey contained a statement that informed the public that response to the survey was mandatory as a follow-on survey to the Census of Agriculture. In 2011 and 2016 the survey was conducted as a voluntary survey, and was funded through a cooperative agreement with the USDA Risk Management Agency (RMA).

Recommendation 2: NASS is proposing to eliminate the section asking for data on the unintended presence of genetically modified organisms (GMO's) in organic fields and corresponding economic losses. While we do understand the difficulty in securing "clean" usable data from these questions, this is an ongoing reality that must be accounted for and tracked for the industry.

Reply: NASS will be including the following questions to replace the loss table used previously:

Have you ever experienced economic loss due to unintended **GMO or genetic** contamination of a certified organic crop you produced for sale? Check all that apply

- Yes, in 2019
- Yes, in 2018
- Yes, prior to 2018
- No

Have you ever experienced economic loss due to unintended **pesticide** contamination of a certified organic crop you produced for sale? Check all that apply.

- Yes, in 2019
- Yes, in 2018
- Yes, prior to 2018
- No

Recommendation 3: Have you had organic product rejected due to genetic contamination, or were you forced to take a conventional price for your organically produced commodity?

Reply: We are limiting our GMO/pesticide questions to what is in recommendation 2. Based on previous surveys NASS felt that it would add more burden on the respondent and the data may not be quantifiable, so we felt the option above was the best compromise.

Recommendation 4: Have you experienced any unintended chemical residue from pesticides prohibited by the National Organic Program?

Reply: (See recommendation 2 above)

Recommendation 5: OEFFA strongly opposes the elimination of questions around GMO contamination and inclusion of some form of the two questions presented above

Reply: (See recommendation 2 above)

Recommendation 6: OEFFA strongly opposes elimination of the production expenses section.

Reply: NASS will be including the following question:

Report production expenses paid by this operation in 2019.

- Include expenses paid by your landlords and contractors.
- Exclude expenses not related to the farm business.
 - a. Organic certification expense
 - b. Certified organic feed purchased for livestock and poultry
 - c. Food safety related expense
 - d. Hired agricultural labor including contract labor (include wages and benefit expenses)
 - e. Seed, annual seedlings, and planting stock

- i. Organic seed, annual seedlings, and planting stock purchased
- ii. Non-organic seed, annual seedlings, and planting stock purchased

Recommendation 7: Include more information regarding crop insurance availability in section 9

Reply: In the crop insurance section the responses have been expanded to give the operator more choices to answer the question.

Which of the following best describes the reason why crop insurance was not purchased for the uninsured organic acres in 2019? (Check one)

- 1. Organic crop insurance is too expensive
- 2. I am unfamiliar with organic crop insurance
- 4. Crop insurance agents are unfamiliar with organic crop insurance
- 5. Organic crop insurance is not available for the organic commodities I produce
- 6. Organic price elections are not offered for the organic commodities I produce
- 7. I do not need/want organic crop insurance
- 3. Other (specify): _____

Recommendation 8: To facilitate why participation may be low further options to the survey should be included:

- Too expensive
- Not available or offered for the organic crops produced
- Organic price elections not offered for the organic crops produced
- Agent unfamiliar with organic production or policies
- Other (specify)

Reply: (See recommendation 7 above)

Recommendation 9: Disaggregate Green and Animal Manure.

Reply: This has been done.

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| Green manures (cover crops plowed under to enrich the soil)? | Yes - No |
| Cover crops not plowed into soil? | Yes - No |

Recommendation 10: Report **total production expenses** paid by this operation in 2019 as reported on your Schedule F and the portion of those expenses used for organic production. (Do not include personal or living expenses.)” And then include the following list of expenses:

- Organic certification expenses
- Fertilizers, lime and soil conditioners
- Crop protection materials for pest, disease, and weed control, including botanical and microbial pesticides and fungicides, beneficial insects, etc.

- Certified organic seed and plants
- Non-certified organic seeds and plants
- Labor hired (including contract labor)
- Livestock purchased or leased
- Feed purchased for livestock and/or poultry
- Total Expenses (line 33, Schedule F)

Reply: (See recommendation 7 above)

Once a finalized draft of the questionnaire is ready it will be submitted to OMB along with the supporting statements, samples of publicity materials, and other documents for the public to review for 30 days. After that OMB will be able to begin their review of the complete docket materials. The materials will be available in the Office of Information and Regulatory Affairs system <https://www.reginfo.gov/public/do/PRAMain>.

The Organic Survey is extremely important to our data users. Your comments will be provided as a part of this submission to the Office of Management and Budget.

Please let us know if you have any questions or concerns.

Again, many thanks!

Joseph L. Parsons
Chair, Agricultural Statistics Board
U.S. Department of Agriculture
National Agricultural Statistics Service