



United States Department of Agriculture  
National Agricultural Statistics Service



May 29, 2019

Jessie Bovay

Dear Jessie,

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: Mercaris would like to see questions related to organic land rent. We are especially keen to learn the average land rent cost as well as rent terms as they relate to this specialized area of agriculture.

Reply: Currently, NASS collects cash rent information under docket 0535-0002. However, there is not a breakout for organic acres at this time, but we will look at the possibility of adding that to next year's questionnaire. In order to minimize respondent burden as much as possible, we opted not to include the cash rent questions to this survey.

Recommendation 2: Mercaris would also like to see questions related to on-farm storage. Namely—does the farm have on-farm storage and if so, what is the capacity range? This question is applicable to every organic commodity and will help the industry to better understand stock numbers.

Reply: Currently, NASS collects on farm grain stocks and capacity under docket 0535-0213 using our quarterly Agricultural Survey. Organic data would be included in the totals we are currently collecting. We feel that collecting organic stock data without a time series of data would be of minimal use. We would not know if the amounts reported would be representative of the peak amount or a portion of their harvest. To collect sufficient

information to qualify the data could potentially add a large amount of respondent burden. Therefore we chose not to include these questions on this survey.

Recommendation 3: To better understand crop rotations that organic field crop producers utilize, we would like to see this section updated to include organic acres planted with a cover crop as a soil amendment but will not harvest it.

Reply: Currently, NASS collects cropping practices on our Agricultural Resource Management Survey (ARMS) under docket 0535-0218. We do currently collect some of the organic data you may be looking for. We rotate the crops that are surveyed each year, so we can minimize respondent burden.

Recommendation 4: To better understand crop rotations that organic field crop producers utilize, we would like to see this section updated to include organic acres that are being multi cropped, inter-seeded, etc.

Reply: See reply above.

Recommendation 5: What percent of this operation's total organic acres were covered by RMA Insurance options in 2019?

Reply: After talking with an RMA representative about recommendation 5 and 6. They did not feel respondents would be able to answer either of these questions sufficiently.

Recommendation 6: What percent of the operation's total organic acres were covered by non-RMA Insurance options in 2019?

Reply: See reply above.

Recommendation 7: Marketing Practices for Organic Products question add elevator to description.

Reply: NASS is focusing the marketing questions to only include the marketing practices that align with the Local Foods Survey (0535-0259), which are; direct to consumer, and direct to retail, institution or food hub (as in the local foods marketing survey). The remainder of sales is assumed to be direct to wholesale channels, which would include marketing to elevators.

Recommendation 8: Marketing Practices for Organic Products - We believe that the mileage descriptions of locally/ regionally/ nationally/ internationally are too broad and should be better defined. Our suggested definitions are:

- i. Locally (0-25 miles)
- ii. Sub-regionally (25-100 miles)
- iii. Regionally (100-500 miles)

- iv. Nationally (500 miles or farther but within the United States)
- v. Internationally

Reply: The mileage question was removed from the current questionnaire so this will not be an issue this time.

Recommendation 9: Marketing Practices for Organic Products - Question 5: This question should instead appear, individually in each commodity sections, as it already is, and should be removed from Section 14. Our reasoning for this is to better understand what percentage of crops are production contracted in mixed operations. Certain organic operations, for example dairy production, are commonly produced under production contract and many of these operations are also growing grain for their operations, which would not be under a production contract. This question, as it stands now, would not accurately capture that nuance.

Reply: This has been done.

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