



June 13, 2019

Johanna Mirenda, OTA

Dear Ms. Mirenda,

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: The Organic Trade Association's top priority for the 2019 Organic Survey is to retain the section on "Production Expenses" (Section 12).

Reply: 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 2: NASS should retain the section on “GMO Presence” in the 2019 Organic Survey. Furthermore, we strongly urge NASS to expand this section (or add a new section with identical questions) to address “Inadvertent Pesticide Contamination” of organic crops (i.e. the presence of residues from prohibited pesticides on an organic crop that are not a result of the intentional, willful, or direct application of prohibited pesticides by the organic operator). Inadvertent contamination or crop loss from prohibited pesticides such as glyphosate or dicamba can adversely impact organic farms on par with GMO contamination. Collecting data on the economic impact of such contamination is important to understanding the current state of contamination, and to identify areas where research and other supportive resources can be directed.

Reply: NASS will be including the following question:

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

NASS will also be including the following question:

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: Section 13: Organic Production Practices

We suggest adding the following practice to the list of organic production practices:

- Implement crop rotations to maintain or improve soil organic matter content, provide for pest management, manage plant nutrients, and/or provide erosion control.

Reply: Some of these cropping practices information are already being collected in the Agricultural Resource Management Surveys (0535-0218). To help minimize respondent burden, these additional questions will not be included.

Recommendation 4: Section 15: Other Information

Question 5 asks which of the following the respondent would consider the primary challenge as an organic farmer. The results of the 2014 Production Survey show that 20% of the responses said “other.” Therefore we suggest adding the following challenges to this list to address the other possible primary challenges facing organic farmers.

- Inadvertent contamination by prohibited pesticides or GMOs (leading to loss of market, price and/or organic certification)
- Lack of technical assistance information and advice (untrained county extension personnel, lack of knowledgeable farm advisors, lack of information and advice specific to organic, etc.)
- Lack of research necessary to overcome organic production challenges (weed control, soil building, no-till, etc.)

Reply: NASS will be including the practices that were itemized in the 2014 survey again this time.

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