



United States Department of Agriculture
National Agricultural Statistics Service



May 29, 2019

Allison Johnson, NRDC

Dear Ms. Johnson,

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: NASS should retain questions about production expenses in the survey.

Reply: NASS will be keeping the production questions in the questionnaire. However, they will be reformatted to make it easier for the respondents to answer.

Recommendation 2: The survey should collect information from farmers about unintended pesticide contamination.

Reply: NASS will include questions on presence or absence of unintended pesticide contamination, but we will not be able to measure the extent of the contamination with this survey.

Recommendation 3: The survey should include questions about plans for transition, including expected acreage, expected crops/animals, and anticipated barriers (e.g., land availability and tenure, costs, market stability).

Reply: NASS to ask the same transitional acreage questions that appeared in the 2014 questionnaire.

Recommendation 4: The survey should request more detail on challenges farmers face in maintaining certification. In addition, the scope of the survey should extend to farms where organic certification has lapsed in the last five years, to capture more information about factors that may drive producers out of the organic sector.

Reply: The number of challenges that a farmer may face, could be numerous and difficult to quantify. In our effort to minimize respondent burden, we decided against expanding this section of the questionnaire.

Recommendation 5: The survey should track organic farmers' successes and challenges in securing and using federal crop insurance, so policymakers can better evaluate improvements to date, as well as areas where more action is needed.

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 6: The survey should document which soil-building practices operations use, including granular information about soil inputs, cover-cropping, crop rotation, and erosion prevention.

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

Recommendation 7: The survey should address both the amounts of land left uncultivated and the underlying reasons for those amounts.

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

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