



May 29, 2019

Jane Sooby, CCOF

Dear Ms. Sooby,

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: Focus on surveying certified organic farms and report certified organic data separately from exempt or transitional data.

Reply: The 2019 Organic Survey will focus only on certified organic data. The 2017 Census of Agriculture Organic Special Tabulation, which will be released in the fall of 2019, will separate certified and exempt data.

Recommendation 2: Report acreage data separately for certified organic, exempt, and transitional acres, and collect data on split organic-conventional acreage.

Reply: The 2019 Organic Survey will focus only on certified organic data. The 2017 Census of Agriculture Organic Special Tabulation, which will be released in the fall of 2019, will separate certified and exempt data.

Recommendation 3: Gather information on the length of time an operation has been certified organic.

Reply: NASS will be including the following two questions.

- In what year did this operation first grow or raise any agricultural products?

- In what year did any portion of this operation become certified organic?

Recommendation 4: Retain the “GMO Presence in Organic Crops” question.

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

Recommendation 5: Ask about incidence of herbicide and pesticide drift and its impact on organic sales.

Reply: NASS will 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 6: Retain 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: Stop conflating green and animal manure application in the “Organic Production Practices” section.

Reply: This has been done.

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

Recommendation 8: Document proportion of planted seed that is certified organic vs conventional.

Reply: NASS wants to see if this is a significant problem before adding on a new line of questions for percentages of organic seeds planted for each commodity, thus increasing respondent burden. NASS will be including the following question:

- Was this operation able to acquire sufficient amount of organic seed in 2019? Yes - No

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