



May 29, 2019

Kiki Hubbard

Dear Ms. Hubbard,

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.

Recommendation1: Retain the ‘GMO Presence in Organic Crops’

- We suggest rephrasing the question to make it simpler for farmers to understand what information is being requested. Currently, it states:
 - o “Have you experienced economic losses that you can document due to the unintended presence of GMO material in an organic crop you have produced for sale?”
- We suggest NASS replace this question with the following:
 - o “Have you experienced any unintended presence of GMO material in an organic crop you have produced for sale?”

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 2: Expand Section 10 to include ‘Unintended Presence of Pesticide.’ We suggest the following language:

- Have you experienced any unintended presence of non-NOP approved pesticides on an organic crop you have produced for sale?

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 3: Retain questions on ‘Production Expenses’

- To further refine this section NASS can rephrase the opening statement with the following:

Report total production expenses paid by this operation in 2019 as reported on your Schedule F and the portion (percent) of those expenses used for organic production. (Do not include personal or living expenses.)

And then include the following list of expenses:

- a) Organic certification expenses
- b) Fertilizers, lime and soil conditioners
- c) Crop protection materials for pest, disease, and weed control
- d) Certified organic seed and plants
- e) Non-certified organic seed and plants
- f) Labor hired (including contract labor)
- g) Livestock purchased or leased
- h) Feed purchased for livestock and poultry
- i) Total Expenses (line 33, Schedule F)

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 4: Usage and Availability of Organic Seed

Report the portion of certified organic and non-certified organic seed planted for organic crops you produced in 2019.

Organic Crop	Certified Organic Seed (Percent Acreage Planted)	Non-certified Organic Seed (Percent Acreage Planted)
Crop 1		
Crop 2		
Crop 3		

Reply: 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