



May 29, 2019

National Sustainable Agriculture Coalition,
Organic Farming Research Foundation, and
National Organic Coalition

Dear Juli Obudzinski,

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: Expand Section 9 to include more information regarding crop insurance availability.

Which of the following best describes the reasons why crop insurance was not purchased for the uninsured organic acres in 2019? (Check all that apply):

- Too expensive
- Not feasible for my operation
- I don't know enough about organic crop insurance
- I rarely experience major loss on my organic production
- Organic policies are not available for what I produce
- Crop insurance agents and adjusters are not familiar with organic production and/or policies for organic operations
- Other (specify)

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

1400 Independence Ave., SW, Washington, DC 20250
(202) 720-2127 · (202) 720-3578 FAX · www.nass.usda.gov

- 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 2: Retain the ‘GMO Presence in Organic Crops’ (Section 10).

In the 2014 Organic Survey, the question reads:

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? (Exclude expenses for preventative measures and testing of your crop.

NASS should replace with the following:

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 3: Expand Section 10 to include ‘Unintended Presence of Pesticides.’

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

This would be followed by requesting respondents to itemize associated economic losses by year, crop, quantity, and unit as currently described for the question on GMO contamination. Further, we would urge NASS to rename Section 10 to “Unintended Presence of Substances Not Approved for Use in Organic Production”.

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 4: Retain questions on 'Production Expenses' (Section 12)

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).

- 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 seeds 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 5: Disaggregate data collected on use of green and animal manure (Section 13)

In 2019, did this operation use any of the following practices for organic agricultural production?

- Cover crops (harvested or grazed) or green manures (incorporated into soil)
- Animal manure

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 6: Transitional Acreage (Section 16)

We recommend that NASS expand Section 16 to include a question on plans for future transition of additional acres, what crops/animal will be grown/raised on future acres transitioned, and any barriers that exist to transitioning additional land into organic production (i.e. limited availability of land, rising costs of farmland, lack of secure tenure on farmland, etc.).

We would also urge Question 4 to be further broken down to ask about specific commodities grown or raised on transitional acres (rather than generic “cropland”). We would also urge NASS to explore ways to collect further granularity on the current use of the land intended for transition into organic production (i.e. in current agricultural production (conventional), not currently in agricultural production, currently in forest, pasture, etc.). This data can help analyze trends underlying market shifts and organic growth, as well as provide background information on the decision farmers make to expand their business.

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.

Recommendation 7: Record the year the operation was first certified organic.

Reply: This has been done.

Recommendation 8: 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

Recommendation 9: Food Safety

In 2019, the new FDA rules for Produce Safety go into effect, including on-farm inspections. Some farms are exempt from the Produce Safety Rule or most of the Produce Safety Rule based on their annual sales, crops grown, crop use, and market venues.

1. Do you anticipate having to meet additional produce safety requirements under the new FDA food safety regulations? If yes, continue. If no, skip to Section xxx.
2. Please provide an estimate of anticipated annual costs of compliance, including new infrastructure, materials, and labor.
3. Did you make any changes to your Organic Systems Plan in order to be in compliance with new FDA regulations? If so, please specify any changes.

Reply: Without doing extensive testing we do not know how many respondents could answer these questions about future safety requirements. Rather than add additional respondent burden to the questionnaire for information we don't know if we can summarize we opted to omit these questions.

Recommendation 10: Estimated percentage of land left uncultivated for on-farm biodiversity

What percentage of your farmland do you leave uncultivated for the following purposes?

- a. On-farm biodiversity, including habitat for pollinators, natural enemies for pests, other beneficial organisms, and wildlife.
- b. Buffer zones to protect organic fields and production areas from pesticide or GMO pollen drift, agrochemicals and pathogens in runoff, or other sources of NOP-prohibited substances.

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