



Healthy Plants • Healthy World

December 19, 2007

Honorable Chuck Conner
Acting Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

Dear Secretary Conner:

The American Phytopathological Society (APS) is alarmed to learn that the U.S. Department of Agriculture (USDA) recently announced plans to discontinue the Agricultural Chemical Usage Surveys conducted by the National Agricultural Statistics Service (NASS). APS is writing to ask that you reinstate this program as it is critical to the management of diseases and other crop pests.

The Chemical Usage Surveys are relied upon by the USDA Office of Pest Management Policy and the U.S. Environmental Protection Agency (EPA) to conduct risk assessments and establish pesticide policy decisions. EPA relies on NASS data to comply with the Food Quality Protection Act and continues to have need of such data to make required decisions on Registration Review of pesticides. Without the NASS data, the EPA more than likely, will use the default of 100 percent crop treated in future risk assessments and this could result in the loss of crop protection tools for U.S. farmers.

Additionally, a broad array of agricultural commodity and producer organizations rely on these data to participate in rule making and respond to EPA inquiries regarding pesticide and fertilizer use. Recent decisions by EPA to include information on the Clean Water Act and the Endangered Species Act in Registration Review make these data from the Usage Surveys even more important in ensuring that data quality for risk assessments is not compromised.

Chemical Usage Surveys are the only source of publicly available data on pesticide and fertilizer use. While proprietary data on pesticide use are available, it is prohibitively expensive. If USDA discontinues the usage surveys, only subscribers to proprietary data services will be aware of pesticide and fertilizer use. Most farmers and those of us interested in managing crop diseases and pests will not have critical information on the amount of pesticide and fertilizer use or trends in these uses.

The APS recommends that USDA reevaluate the importance of the Chemical Usage Surveys and urges the Department to consider that the interests of agriculture will not be met by discontinuing a vital program that provides accurate, timely pesticide and fertilizer use information. We respectfully urge you to reinstate this program. Thank you.

Sincerely,

Ray D. Martyn
APS President

Cc: Undersecretary for REE Gale Buchanan

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