



Healthy Plants • Healthy World

March 27, 2017

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US Department of Agriculture
Room 5336 South Building
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SUBJECT: The American Phytopathological Society Comments on the Notice of Intent to Request Revision and Extension of a Currently Approved Information Collection by the National Agricultural Statistical Service, USDA

On January 25, 2017, in accordance with the Paperwork Reduction Act of 1995 the Office of Management and Budget issued this notice announcing the intention of the National Agricultural Statistics Service (NASS) to request revision and extension of a currently approved information collection, the Agricultural Surveys Program.

The subject Notice states: *The primary objective of the National Agricultural Statistics Service (NASS) is to collect, prepare and issue State and national estimates of crop and livestock production, prices and disposition as well as economic statistics, farm numbers, land values, on-farm pesticide usage, pest crop management practices, as well as the Census of Agriculture. The Agricultural Surveys Program contains a series of surveys that obtains basic agricultural data from farmers, ranchers, and feedlots throughout the Nation for preparing agricultural estimates and forecasts of crop acreage, yield, and production; stocks of grains and soybeans; hog and pig numbers; sheep inventory and lamb crop; cattle inventory; cattle on feed; grazing fees; and land values. Uses of the statistical information collected by these surveys are extensive and varied. Producers, farm organizations, agribusinesses, commodity exchanges, State and national farm policy makers, and government agencies are important users of these statistics. Agricultural statistics are used to plan and administer other related Federal and State programs in such areas as consumer protection, conservation, foreign trade, education, and recreation.*

As a society that encompasses basic and applied scientific disciplines, the American Phytopathological Society (APS) appreciates the endeavors of NASS to aid in the ongoing efforts to address effective and sustainable management of crop diseases, insects and weeds that would otherwise affect crop yields and quality. The APS is a non-profit, professional scientific organization representing nearly 5,000 scientists and practitioners of plant pathology. The APS is the premier society dedicated to high quality, innovative plant disease research and management, especially as it relates to feeding the ever-growing world population. The APS is comprised of a distinctive community of scientists who come from academia, industry, government and private practice, and whose commitment is to the judicious use of sound science to shape public policy as it relates to management of plant diseases.

The APS strongly underlines the need for data generated for on-farm chemical (fertilizers, pesticides) usage and pest crop management practices, as well as forecasts of crop acreage, yield, and production. The APS recognizes that the statistical information collected by these surveys is used extensively and for varied purposes, and by a broad range of users, including producers, farm organizations, agribusinesses, commodity exchanges, state and national farm policy makers, and government agencies.

The APS was concerned when the Agricultural Chemical Usage Surveys budget was reduced by approximately \$8 million several years ago, and remains concerned

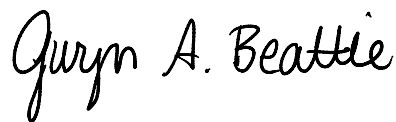
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that those funds have not yet been restored. This budgetary loss forced NASS to reduce the number of surveys that measure chemical (fertilizer, pesticide) usage in both commodity and specialty crops. This action required users of data from those surveys, including a broad array of agricultural commodity and producer organizations, to rely on less accurate and less timely information. Facts found in these surveys are useful for research purposes and are critical for risk assessments performed by the U.S. Environmental Protection Agency (EPA). When EPA does not have reliable usage surveys, the Agency may compromise pesticide risk assessments by defaulting to 100% of a crop treated when in reality, particularly for specialty produce, the chemical crop treatment may be as low as 5 to 10%. Without these data, additional risk assessments required by the Endangered Species Act, Clean Water Act, Safe Drinking Water Act, and others are likely to be conducted by also assuming that 100% of the crop acreage is treated with a particular chemical. A lack of accurate and timely information also hinders efforts to create accurate and timely County Bulletins, which growers use in determining if there are threatened or endangered species or water bodies at risk in their production areas.

The subject notice invites comments on whether the proposed collection is necessary from the standpoint of practical utility; if the information is accurate based on methodology and assumptions utilized; ways to enhance the quality, utility and clarity of the data and ways to minimize the burden of collection on the farmers and growers that respond to the surveys. The APS maintains that data collected by NASS is of high quality, is clear and is extremely useful for scientific programs to continue with accurate information in development of sustainable agriculture in the U.S.

In fact, the APS along with other collaborators have launched a strategic plan to advance research on a new paradigm for improving crop health and productivity as outlined in the Phytobiome Roadmap (www.phytobiomes.org/roadmap). The goal of this effort is to develop systems-level understanding of crops and their environment such as soils, microorganisms, and other factors. This systems-level understanding greatly benefits from data from the NASS surveys, including data regarding on-farm chemical usage and pest and crop management practices. The recent efforts of NASS to enhance current satellite-based monitoring to provide crop condition, soil moisture, crop progress and yield data are also important and should continue the already minimal burden associated with data collection. The APS encourages strong support for NASS and its work, which is of critical importance and value to U.S. farmers, and requests that the NASS budget be maintained, and if at all possible, increased to ensure the continuation of these vital surveys.

Sincerely,



Gwyn A. Beattie
Chair, APS Public Policy Board