

Advisory Committee on Agriculture Statistics

SUMMARY AND RECOMMENDATIONS
February 14-15, 2006



U.S. Department of Agriculture
NATIONAL AGRICULTURAL STATISTICS SERVICE

Summary
Meeting of the Advisory Committee on Agriculture Statistics (ACAS)
February 14-15, 2006
Marriott Gateway Crystal City
1700 Jefferson Davis Hwy
Arlington, VA 22202

Members Present

John Baugh	Lucy Meyring
Patricia T. Berglund	Doris Mold
Roger M. Cryan (Tuesday only)	A. Gene Nelson
Peter Daniel	Ronald Plain
Jacklyn Marie Folsom	James Robb
Terry L. Franel	Kent Schescke
Janice Gengenbach	Ira Silvergleit
R. Edmund Gomez	Ranvir Singh
Barry Goodwin	Kitty Smith (ERS Ex-Officio)
John J. Hays	John Smylie
Frank Howell	Ewen M. Wilson (Census Bureau Ex-Officio)

Members Absent

Gary M. Adams	Carl Brothers
Brent Blauch	William Lapp

NASS Personnel Participating:

Joe Reilly, Committee Executive Director and Associate Administrator
Ron Bosecker, Administrator
Marshall Dantzler, Deputy Administrator for Field Operations
Carol House, Deputy Administrator for Programs and Products
Janice Goodwin, Associate Deputy Administrator, Western Field Operations
Hubert Hamer, Associate Deputy Administrator, Eastern Field Operations
Jack Nealon, Director of Information Technology Division
Kent Hoover, Chief, Census Planning Branch, Census and Survey Division

Ray Garibay, Director, Marketing and Information Service Office
Martha Farrar, Chief, Data Collection Branch
Quentin Coleman
Ellen Dougherty
Jim Ewing
Dania Ferguson
Ginger Harris
Stan Hoge
Corey Jenkins
Joe Miller
Jacqueline Moore
Dale Hawks, Committee Secretary

Public:

Joseph Jen, Under Secretary, REE	Merle Pierson, Deputy Under Secretary, REE
Mark Bowen, US Apple Association	Liu Chuang, NRCS
Charles Dodson, FSA	David Donaldson, EPA
Leonard Gianessi, Crop Life Foundation	Jeff Goebel, NRCS
Steve Koenig, FSA	Jack C. Mitenbuler, Dow
Eric Novak, Doane	Nathan Reigner, Crop Life Foundation
Nina Singh, wife of Ranvir (ACAS member)	Dawn Thilmay, CSREES

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Day One Summary - February 14, 2006

I. Introduction

The meeting was called to order by Committee Chair, Jackie Folsom on February 14, 2006 at 1:00 p.m. Jackie welcomed the committee members to the meeting and then introduced Joe Reilly, Executive Director, to introduce two special guest. Joe introduced Dr. Jen, Under Secretary of Research, Education, and Economics (REE) and Dr. Pierson, Deputy Under Secretary of REE.

Dr. Jen welcomed the committee and stated how important the committee is to the department and mentioned that the Secretary would have stopped by but the Secretary was currently preparing for a hearing. Then Dr. Jen introduced his Deputy Dr. Pierson. Dr. Pierson talked about how important NASS is to the department. Dr. Pierson gave a brief career history and stated how much he has learned about NASS. Then Dr. Pierson turned the meeting back over to Jackie, who asked each member to introduce themselves to the other members. After the introductions Jackie proceeded with the agenda (Appendix I), with the exception of State of NASS which was moved to Wednesday.

II. 2005 Recommendations Review

Joe Reilly was the first presenter for the meeting. Since, the committee has nine new members, Joe decided to reiterate the committees purpose and duties. He stated NASS's mission, which is to provide timely, accurate, and useful statistics in service to U.S. agriculture. Joe also stated that NASS is the statistical arm for the Department but NASS does not set policy or disclose individual reports with its pledge of confidentiality.

The next portion of the presentation focused on the ten recommendations from last years meeting. Joe had responded to each recommendation with an update on the progress for each recommendation. See Appendix II.

III. 2007 Census of Agriculture - Follow-on Survey Program

Kent Hoover presented information on the 2007 Census of Agriculture, follow-on survey program process and that historically, the census of agriculture has included a series of follow-on surveys to collect detailed information on specific agriculture related topics. Kent explained for example that special collections in the past decade have included horticultural specialties, irrigation, aquaculture, and agricultural economics and land ownership. Throughout the years, these programs have undergone changes in order to keep the data relevant and meet the needs of data users.

Kent then proceeded to ask Advisory Committee members to prioritize the six possible follow-on surveys: Horticulture, Irrigation, Economics and Land Ownership, Aquaculture, Orchards and Vineyards, and Organic. After discussion with committee members the following surveys took priority: Census of Horticulture, Farm and Ranch Irrigation Survey, and Economics and Land Ownership Survey.

During the discussion, one member mentioned that Economic Research Service (ERS) has conducted surveys of certified organic growers and this should be sufficient information on organic growers. Also, the committee did not feel that an aquaculture or the orchard and vineyard census were needed because the interest had not risen to the level that the others had accomplished.

Day Two Summary - February 15, 2006

IV. State of NASS

Ron Bosecker welcomed the committee to D.C. and then proceeded to speak on NASS's American Customer Satisfaction Index (ACSI), 2007 budget and top 10 priorities that guide our policies, research and operational activities.

The University of Michigan surveyed NASS's customers to compute the ACSI for NASS. The index was higher than the last survey and higher than average scores for both government and private sector organizations. NASS commissioned George Mason University to conduct a survey of all employees and Office of Personnel Management (OPM) sampled the entire Federal government. In both of these surveys NASS score improved from the previous survey. With the OPM survey index results for "Best Places to Work in the Federal Government", NASS ranked 26th out of 250 Federal agencies and 1st within USDA.

The appropriated budget for 2007, if realized, will represent nearly a 10 percent increase from the 2006 budget. The majority of this increase can be attributed to the preparation for the 2007 Census of Agriculture.

Ron then proceeded to talk about NASS's top 10 priorities. The top 10 priorities are: 10. Use Historical NASS data and administrative data to full advantage; 9. Strengthen communication and service; 8. Improve timeliness, accuracy, and usefulness of agriculture statistics; 7. Complete information technology systems for a timely and high quality 2007 Census of Agriculture; 6. Develop staff for career opportunities; 5. Achieve NASS operational efficiencies for staff; 4. Measure performance for NASS and staff; 3. Understand employee satisfaction and reward innovation and dedication; 2. Ensure security, confidentiality, continuity of operations; 1. Improve respondent relations and reduce reporting burden.

V. Electronic Data Reporting and Web page Review Demo

Ray Garibay and Corey Jenkins did a demonstration on navigating and utilizing the NASS website. Ray stated that the new NASS website looks like the USDA website, so users should be able to navigate between the websites easier.

One comment from an advisor committee member was that all of the graphics take a long time to load if you are still using dial-up computers. This is something that needs to be taken into consideration because a lot of farmers might have dial up still. Another comment, other agencies and information links from the NASS website are needed. They showed how to navigate and utilize the website to find information that a respondent would want to know. Summarize results

of the NASS website conversion, comparing original vision to the end result

Martha Farrar presented NASS's uses of multiple modes of data collection for any given survey which consist of computer assisted telephone interview (CATI), enumeration both personal and telephoning, and electronic data reporting (EDR). In 2003, NASS developed an EDR System to offer respondents the option of reporting to NASS surveys via the Internet. In FY2005, there were 57 surveys offering the EDR option with an additional 34 surveys targeted to be offered in FY2006. By the end of FY2008, NASS will provide an EDR option for respondents for all appropriate and practicable surveys including the 2007 Census of Agriculture.

Martha commented that NASS would like to increase the awareness and thus use of EDR for survey reporting. The July 2005 NASS Computer Usage Report indicates that 51% of all farms have internet access and 31% of all farms use a computer for business. The number of respondents using the Internet to report for the 57 surveys offering EDR as of June 2005, was 1.7% of the sampled population. With so many farmers using the internet, NASS will continue to improve the process to provide the respondent with a user friendly experience and look for opportunities to promote EDR for NASS surveys and censuses. It was also mentioned about the speed of the connection or type of connection (dial-up) might affect the use of EDR.

A demonstration of EDR for the Census of Agriculture was conducted by Martha. Some of the comments from the Advisory Committee members were concern about the word "Warning" being used on the first page. After discussing how this might discourage farmers from filling out the Census, Martha agreed to revisit changing the wording or toning it down so it is not as obtrusive. It was also suggested that it might be a good idea to tell farmers how long the survey will take depending on broadband or dial-up connection.

VI. Improving Respondent Relations

Ray Garibay presented the next topic on improving respondent relations. Reducing reporting burden is NASS's number one priority. The number of U.S. agricultural products is declining. At the same time, the demand for data, and hence the number of NASS surveys, is increasing.

NASS will continue to implement and measure the effectiveness of respondent burden reduction measures such as electronic data reporting, short forms, improved sampling techniques, and better use of existing data (FSA administrative data, previously reported data). Improve respondent relations through a more strategic approach to public relations and marketing. NASS will use producers, data users and other respondents to get the word out on how importance NASS information is to marketing decisions and how participation in NASS surveys is in their own interest.

VII. Small and Minority Farm Coverage for the 2007 Census of Agriculture

Bob Bass covered the next topic on small and minority farm coverage for the 2007 Census of Agriculture. The coverage goals for the 2007 census include: 73% of the minority operated farms, up from 68% in 2002, and at least 75% of all farms in each State, which was not met by six States in 2002. Census coverage refers to the portion of a census published value that is

directly attributable to records on the census mail list (CML). Higher coverage improves the quality of the census data, especially at the State and county levels. NASS is conducting extensive outreach to minority communities through community based organizations (CBOs), other groups and individuals working with minority producers, and conferences for minority producers. NASS is also searching for good list sources targeted to small non-traditional farms. ACAS feedback and guidance on list sources is sought.

NASS realizes that new census tables are needed to provide more comprehensive data on minority operated farms, including farms with multiple race operators, and on minority operators, including multiple race operators, have been drafted. These tables are similar to tables published in Appendix B for American Indian farms and operators in the 2002 census.

VIII. Subcommittee on Pesticide Use

Jack Mitenbuler and Leonard Gianessi presented the materials for the Subcommittee on Pesticide Use. Since, most of the members this year were new to the committee, Jack started by giving the history and need for the subcommittee duties. The subcommittee was formed to seek the feasibility of expanding the NASS pesticide use program.

Next Leonard presented the findings of the subcommittee as follows. After having examined the current role of NASS agricultural chemical usage data, exploring future needs for public pesticide use data, and assessing support for enhancing the NASS program, the only actionable recommendation the subcommittee can make is for improvements in NASS's relations with the data users. The NASS agricultural chemicals program should host more frequent and organized user group meetings. Regular feedback should be solicited from agricultural chemical companies, academic and institutional researchers, and commodity and farm groups. These meetings will empower users to provide feedback to NASS and allow NASS to apprise users of proposed changes to the program early in the discussion process. These meetings are a vital first step if NASS is to generate and leverage support to maintain or enhance their agricultural chemical use data.

As far as Jack and Leonard were concerned, since interest in the pesticide industry was low for NASS to expand the data series, it was concluded that the subcommittee had researched the topic completely and no longer needed to be subcommittee.

See [Appendix III](#).

IX. Other Committee Topics

During the general session a discussion on Animal Unit Month (AUM) was discussed and a subcommittee was formed which consisted of Lucy Meyring, Gene Nelson, and Jim Robb. After the conclusion of the meeting the subcommittee meet with Jim Ewing, Carol House, and Jim Miller to discussion the wording of the AUM question. Carol House stated during the meeting that there would not be enough time to test new wording, so the committee could recommend dropping the question. The subcommittee decided to submit a recommendation to drop the question.

Also, during the meeting an Energy subcommittee was suggested to formulate a possible survey that would be conducted to ask farm related questions on energy like the cost to heat buildings, bio-energy, wind energy, and gallons of gas used on the farm. The following members were asked to serve on this committee: Terry Francl, Frank Howell, Doris Mold, Janice Gengenbach, and Kent Schescke.

In addition, the committee discussed the lack of equine data. All states have equine but few have good statistical data for equine on farms. A subcommittee was formed to formulate a recommendation to the Secretary to seek funding for a National Equine survey. The members that wanted to work on this subcommittee were Gene Nelson, Terry Francl, Lucy Meyring, Ron Plain, and Kitty Smith.

X. New Chairperson

The election committee nominated Jacklyn Folsom to serve for second time as Chairperson for the Advisory Committee on Agriculture Statistics, beginning with preparation for the 2007 meeting. Jacklyn accepted the nomination and was approved by attending members.

XI. Closing Remarks for the Advisory Committee

Joe Reilly announced that the next meeting is tentatively scheduled for early 2007 and will be held in Washington, D.C. the same week as the USDA Agricultural Outlook Forum. The meeting was adjourned.

XII. Committee Recommendations

1. The Advisory Committee recommends to the Secretary of Agriculture, that while acknowledging the importance of maintaining individual confidentiality, that NASS be granted access to the National Animal Identification System for the purpose of producing statistical data summaries.
2. The Advisory Committee recommends to the Secretary of Agriculture that NASS work in collaboration with other USDA agencies to establish more direct links to agricultural data contained in other USDA websites.
3. The Advisory Committee recommends to the Secretary of Agriculture that NASS work with the Office of the General Counsel and the Office of the Chief Information Officer, to modify the required “Warning” notification on its Electronic Data Reporting website. NASS should make the “Warning” notification more user friendly in an effort to ease farmers concerns in reporting electronically.
4. The Advisory Committee recommends that NASS establish a phone number for to respondents to contact multilingual operators, – especially Spanish for assistance in reporting for the Census of Agriculture. NASS should also develop questionnaires in other languages, and again especially Spanish. Also, NASS needs to hire indigenous

enumerators to conduct data collection on Indian reservations for the Census of Agriculture.

5. The Advisory Committee recommends that a subcommittee consisting of Gene Nelson, Terry Francl, Lucy Meyring, Ron Plain, and Kitty Smith, study the need and feasibility of a National Equine survey. If the feasibility of conducting a National Equine survey is justified by this subcommittee, it will enhance NASS's ability to seek appropriation funding.
6. The Advisory Committee recommends that NASS conduct more in-depth research concerning the new question on the Census of Agriculture asking for data on the acres operated on an Animal Unit Month (AUM). The current members felt that the wording of the AUM question might be misunderstood by operators and result in misreported data. (This same AUM question has also been added to the Agricultural Resources Management Survey ARMS)
7. The Advisory Committee recommends that a subcommittee consisting of Terry Francl, Frank Howell, Doris Mold, Janice Gengenbach, and Kent Schescke to research the feasibility of conducting an Energy survey. With the raising cost of energy and the increased use of crops to generate new alternative fuels, the committee felt that the importance of this survey would be of more importance than an organic follow-on survey.
8. The Advisory Subcommittee on Pesticide Data Usage, after meeting and studying the scope of the NASS pesticide and chemical use program, recommended that no changes to the current NASS program are advised at this time and that the subcommittee be discontinued.
9. The Advisory Committee recommends that the priority needs for the 2007 Census of Agriculture follow-on surveys are 1) Census of Horticulture; 2) Farm and Ranch Irrigation Survey; and 3) Economics and Land Ownership Survey.
10. The Advisory Committee recommends that NASS request that the Government Printing Office add the Census of Agriculture to the "Essential Titles for Public Use in Paper Format", to ensure this media is available to all federal depository and research libraries.
11. The Advisory Committee recommends that NASS continue its efforts in working with Community Based Organizations and with the New Mexico pilot project on Indian reservations, to improve overall coverage of small and minority operated farms in the 2007 Census of Agriculture.
12. The Advisory Committee recommends that NASS consider the use of outside promotional consultants and external support endorsements in development of the 2007 Census of Agriculture campaign to encourage producer cooperation.

Appendix I - Agenda

New Advisory Committee Members Orientation: Tuesday, February 14 at 10 a.m.

Tuesday, February 14

<u>Time</u>	<u>Topic\Activity</u>	<u>Discussion Leader</u>
1:00 p.m.	Call to Order	Jacklyn Folsom, Committee Chair
1:05 p.m.	Welcome	Dr. Joseph Jen Under Secretary, Research, Education, and Economics
1:15 p.m.	Introductions and Overview	Jacklyn Folsom
1:30 p.m.	2005 Recommendations Review Goals, Expectations, and “Safeguarding America’s Agricultural Statistics”	Joe Reilly, Associate Administrator and Committee Executive Director
2:15 p.m.	Discussion	Jacklyn Folsom
2:30 p.m.	Break	
2:45 p.m.	2007 Census of Agriculture (follow-on survey programs)	Kent Hoover, Chief Census Planning Branch
4:00 p.m.	Discussion and Recommendations	Jacklyn Folsom
4:30 p.m.	Adjourn	
4:45 p.m.	Reception	

Wednesday, February 15

8:00 a.m.	Call to Order and Overview of Day 1	Jacklyn Folsom
8:10 a.m.	<i>'State of NASS'</i>	R. Ron Bosecker Administrator
8:45 a.m.	Electronic Data Reporting and Web page Review Demo	Ray Garibay, Director Marketing and Information Service Office Martha Farrar, Chief Data Collection Branch
9:15 a.m.	Discussion	Jacklyn Folsom
9:45 a.m.	Break	
10:00 a.m.	Improving Respondent Relations	Ray Garibay
10:30 a.m.	Discussion	Jacklyn Folsom
11:00 a.m.	Small and Minority Farm coverage for 2007 Census of Agriculture	Bob Bass, Director Census and Survey Division
11:30 a.m.	Discussion	Jacklyn Folsom
11:45 a.m.	Lunch	

Wednesday, February 15
(Continued)

1:00 p.m.	Subcommittee Reports	Joe Reilly
1:30 p.m.	Discussion	Jacklyn Folsom
2:00 p.m.	Committee Requested Topics and recommendations	Jacklyn Folsom
2:30 p.m.	Break	
2:45 p.m.	Discussion and Recommendations	Jacklyn Folsom
3:30 p.m.	Public Questions and Comments	Jacklyn Folsom
4:00 p.m.	Recommendations and Wrap up	Jacklyn Folsom
4:30 p.m.	Closing Remarks and Adjourn	Joe Reilly

Appendix II: 2005 Advisory Committee on Agriculture Statistics Recommendations

1. The Advisory Committee on Agriculture Statistics recommends communicating successful outcomes of the New Mexico Small Farms Pilot Study to State Directors in preparation for implementation nationally.

Response: NASS acknowledges the Committee recommendation, but feels that additional work is needed before defining plans for implementation. NASS conducted area frame data collection on 50 land segments located on reservations and pueblo land in New Mexico during June and July 2005. In 2006, we expect to do further testing in 121 segments across five States. Plans for implementation will be communicated to all Field Offices, after testing is complete.

2. The Advisory Committee on Agriculture Statistics recommends initiating interagency strategy sessions nationally with agencies for whom minority and small farm undercounting have been issues of concern. Concurrently, establish on-going dialogue with other USDA agencies and community based organizations that work with small and limited resource farmers to ensure accurate census counting and assistance.

Response: NASS has adopted the Committee recommendation and has partnered with the Risk Management Agency in plans with several community based organizations to provide farm list building assistance.

3. The Advisory Committee on Agriculture Statistics recommends including a representative from the Minority and Small Farm Subcommittee on future external reviews of NASS programs and products.

Response: NASS will adopt the Committee recommendation as it works at establishing an outside review committee to examine the census of agriculture program.

4. The Advisory Committee on Agriculture Statistics recommends keeping the crop production questions on the 2007 Census of Agriculture.

Response: NASS adopted the Committee recommendation and recognizes that providing crop production for various crops at the county level is an important service to agriculture data users.

5. The Advisory Committee on Agriculture Statistics recommends against adding the veal production questions on the 2007 Census of Agriculture.

Response: NASS adopted the Committee recommendation. NASS did add a question to the "Practices", section of the 2007 Census of Agriculture Report Form, which asks the respondent to answer Yes or No if they raise or sell veal calves. Positive answers to this item will provide an excellent frame that could be used for more complete studies.

6. The Advisory Committee on Agriculture Statistics recommends changing the wording of the agri-tourism question on the census to "Agri-tourism and recreational services, such as farm or winery tours, hay rides, hunting, fishing, etc."

Response: NASS adopted the Committee recommendation. The report forms being tested include a Section for "Income From Farm-Related Sources" and requests dollars received from "Agri-tourism and recreational services, such as farm or winery tours, hay rides, hunting, fishing, etc."

7. The Advisory Committee on Agriculture Statistics recommends adding a question to the 2007 Census of Agriculture in the Practices and Land Features section for "value added" on the farm to products. This question can be used for follow-on surveys.

Response: NASS adopted the Committee recommendation. The "Practices" section of the report form asks: "At any time during 2005, did this operation produce and sell value added crops, livestock, or products such as beef jerky, fruit jams, jelly, preserves, floral arrangements, etc.?"

8. The Advisory Committee on Agriculture Statistics recommends adding debt and lender questions (similar to those on ARMS) to the 2007 Census of Agriculture questionnaire.

Response: The Agriculture Resource Management Survey (ARMS) is a timely source of data about debt and lenders. In addition, the Agricultural and Economic Land Ownership Survey (AELOS) collects similar data every 10 years, as a follow-on survey to the census of agriculture. The Paperwork Reduction Act of 1995 (Pub. L. No. 104-13) prevents NASS from duplicating these same questions on the census of agriculture. Estimates of debt can be created using the current data collected as part of the expenditures section on the census questionnaire.

9. The Advisory Committee on Agriculture Statistics recommends that NASS develop a process/strategy to include the collection of data relative to private and public common grazing land on the 2007 Census of Agriculture Census.

Response: NASS adopted the Committee recommendation. A question was added to the acreage section which asks: "How many acres did this operation use on a per-head or animal unit month (AUM) basis? Include private, Federal, State, railroad, Public School District, or Indian Reservation land."

10. The Advisory Committee on Agriculture Statistics recommends that the subcommittee on pesticide data use continue to study ways to enhanced Federal collection initiatives on pesticide data that is more comprehensive and complete for public consumption.

Response: The subcommittee will report on activities and suggestions in this area.

Appendix III

To: Federal Advisory Committee, National Agricultural Statistics Service, United States Department of Agriculture

**From: Leonard Gianessi and Jack Mitenbuler,
Chairpersons, Agricultural Chemical Data Program Subcommittee,
Federal Advisory Committee, National Agricultural Statistics Service, United States Department of Agriculture**

Date: February 15, 2006

RE: Conclusions & Statement for the Record

Throughout the course of its work examining pesticide use data collection and the potential for improvement, the Pesticide Use Data Subcommittee of the NASS Advisory Committee considered three primary questions:

1. Is there interest in creating an integrated national system for pesticide use data collection and distribution combining public and private sources of data?
2. Is there a compelling problem with pesticide use data availability or coverage that is currently unaddressed by available pesticide use data sources?
3. Is there a groundswell of support for a major increase in public funding for federal pesticide use data collection?

After discussion among members of the subcommittee and between the subcommittee and stakeholders, the group concluded that it could not answer these questions in the affirmative. There is no sustained interest or broad support for assembling an integrated national database of public and private pesticide use data sources. There is no recognized and compelling problem that cannot be addressed by current use data systems. There is no groundswell of interest required to increase the NASS budget for agricultural chemical programs.

In addition to chairing the NASS subcommittee, we participated in two additional groups addressing issues of pesticide use data and its improvement:

- A. CropLife America Pesticide Use Data Subcommittee was established to determine if there were unmet use data needs among the crop protection industry.
- B. CropLife Foundation held a meeting of commodity group and farm bureau representatives to discuss the need and support for pesticide use data among America's grower community.

A broad spectrum of groups from agriculture were represented throughout the subcommittee's deliberations, however one important party was mostly absent: Doane Marketing Research (Doane). Doane is the major private sector supplier of pesticide use data. Although invited, they

declined to participate in both the NASS subcommittee and commodity group discussions. Doane collects pesticide use data through a survey process and delivers it to clients electronically on dedicated computers. Their data is proprietary and confidentiality is closely guarded. The six major agricultural chemical companies purchase full Doane systems each year for \$500,000. EPA also buys the full Doane database for \$500,000 a year. Smaller chemical companies buy specific pieces of the Doane database for lesser amounts.

While absent from the NASS subcommittee and commodity group discussions, Doane did participate in the CropLife America Pesticide Use Data Subcommittee discussions. Their position expressed during CLA's subcommittee meetings reflected Doane's commitment to proprietary data. If improvements in available pesticide use data are needed, for whatever reason, by the industry or EPA, Doane would be happy to add these enhancements to its services. For example, EPA has provided additional funds to Doane in the past to include additional data collection parameters of interest to the agency. Likewise, if individual chemical companies have specific needs for pesticide use data on a regional or other basis, Doane has made it clear that it can meet those needs by increasing or tailoring its sampling practices.

The proprietary nature of Doane data effectively stifles the prospect of industry support for and Doane participation in an integrated and publicly available pesticide use data framework. For competitive business reasons, some companies who purchase Doane data are steadfastly unwilling to share any data generated by Doane with those companies or organizations that did not invest in the Doane system. This reluctance effectively terminated the notion of assembling a comprehensive database that integrated public and private data sources.

While Doane is and will remain the crop protection industries primary private source of pesticide use data for the near future, other private sector sources are available and growing. For example, Crop Data Management Systems (CDMS) is expanding its coverage through agreements with food processors, chemical companies, and agricultural distributors and retailers. These agreements allow CDMS to incorporate use data from the growers of certain crops and clients of participating retailers/distributors within geographic regions into a full reporting system. This system can then assemble proprietary, area-wide pesticide use reports.

After examination of Doane, CDMS, and other pesticide use data systems, the CropLife America subcommittee concluded that the needs of the industry can be met by private sector, specifically fee based enhancements to Doane proprietary data. Industry's conclusion was buttressed by EPA's purchases and extensive use of Doane data.

To assess the role Doane data plays in pesticide regulation, EPA was questioned about its use of this proprietary data. EPA was asked if it is acceptable to use proprietary and confidential usage data in public rule making. EPA was also asked to consider the likelihood that it will be required to discontinue the use of proprietary data. EPA responded that it frequently uses proprietary information on a confidential business information basis, that this was a vital practice for protection of commercial privacy and competitive interests and it will continue to use proprietary information in the future.

EPA was also asked to describe value of Doane data to its operation and its willingness and

ability to sustain the annual investment required by Doane. While an expenditure of this magnitude is never certain, Doane data is integral to operation of EPA's Office of Pesticide Programs. The vital role of Doane data was realized by EPA's experience operating without access to the Doane system. Protracted budget and financial issues resulted in the EPA neglecting to make timely payment to Doane for their data system. Hence, the EPA was barred access to the Doane databases. Without access to Doane data, EPA staffs were left unable to answer even basic pesticide use questions about how and when individual pesticides are applied. Beyond provision of basic pesticide use parameters, Doane data includes many additional variables of use to EPA. Information collected by Doane on target pests, timing of applications, product competition within the same market, and use of combination products allow EPA to better characterize pesticide use and place risk assessments within proper agricultural production contexts. These additional variables provide information to EPA that is not available in the NASS or other public sources of pesticide use data.

EPA regularly employs NASS pesticide use data in its risk assessments to compliment and verify data provided by Doane. EPA would like more and enhanced data from NASS, however the Agency is not interested in actively advocating on behalf of NASS nor are they willing to contribute funding to expand the NASS agricultural chemical data program. EPA acknowledges the importance of usage data and its necessity in refining overly conservative assumptions that underlie initial risk assessments. Further, EPA believes that currently available pesticide use data systems, while not ideal, are sufficient to fulfill their needs now and in the foreseeable future. When EPA needs data not available in the NASS or Doane databases, the Agency asks USDA and commodity groups to provide the desired information. We could not identify a problem that the Agency felt could not be addressed by the current process. Some analysts believe that the increasing need for use data at a regional or watershed level could not be met with the current system, but private sector representatives offered assurance that it could be.

The Office of Pest Management Policy (OPMP) at USDA employs NASS agricultural chemical use data when helping EPA to address the scope of pesticide use during risk assessment and regulatory processes. OPMP uses NASS to specify in which states and on which crops a pesticide of interest to EPA is used. NASS area treated and amount applied data is frequently augmented with other data parameters including application timing, target pests, etc. that is collected informally from university extension specialists and commodity groups. While OPMP would rather this data be supplied by NASS, it, like EPA, is unwilling to engage in major efforts or contribute funds to expand the NASS agricultural chemical program.

During the subcommittee's assessment of support for current NASS pesticide use data and the potential for its expansion, a meeting was held with commodity groups and farm bureau representatives. Not only are these groups important stakeholders with respect to any agricultural issue, their lobbying skills and constituency would be needed to generate the popular and political support necessary to motivate and enact enhancement of NASS. After discussion, it became clear that expansion of government pesticide use data programs is not a priority for them. While these organizations use and appreciate currently available NASS use data, they will not devote the resources needed to advance the expansion for several reasons:

- A. Commodity groups and Farm Bureau do not have unfulfilled needs for pesticide use data.

These organizations do not face crises that require comprehensive and public pesticide use data and, when needed, they have alternate sources through which data can be generated.

- B. In order to generate expanded funding necessary to enhance the agricultural chemical data program, the budgets of other programs within NASS, USDA, or other federal agencies would need to be cut. Marshaling the political will to reduce federal budgets requires a clearly-defined and impending problem, which, in the eyes of commodity groups and Farm Bureau, does not currently exist.
- C. Although commodity groups and Farm Bureau support current NASS pesticide use data efforts, that support may be strictly nominal. In recent years the NASS agricultural chemical data program has contracted; extending the sampling for some crops to longer rotations and eliminating others from the survey entirely. After budgetary constraints forced NASS to eliminate nut crops from their pesticide use data survey, staff anticipated outrage complaints from nut crop commodity organizations and other data users... However, NASS did not receive any such objections, outraged or otherwise. This silence indicates that not only is expansion of NASS pesticide use data unfeasible, but support for the program in its current state is quite soft.

The inability to garner support for enhancement of pesticide use data is compounded by the expense of generating data in the public domain. Data available in the private sector is generated at a fraction of the cost of NASS program while providing far more data variables. Although the expense of producing public data is a barrier to improving the NASS program, the processes that require such expenditures ensure a high level of data reliability and accuracy, which are the greatest advantage of NASS data. NASS employs rigorous methods to ensure that statistically representative samples are achieved. The same can not necessarily be said for pesticide use data generated by Doane and other companies and used by EPA and chemical companies. The proprietary agreements entered into by Doane subscribers extend beyond prohibitions on data disclosure, to embargo revelation of the sampling and analytical procedures used to generate their data. Thus, it may be that a large number of the area wide estimates included in the Doane system are based on individual or statistically unrepresentative observations. The subcommittee and other interested organizations have attempted to illuminate these practices and examine discrepancies between Doane and NASS data that may result. These attempts have been unsuccessful as Doane declined to participate in such a review even on an aggregate level where no individual proprietary estimates would be revealed.

After having examined the current role of NASS agricultural chemical usage data, exploring future needs for public pesticide use data, and assessing support for enhancing the NASS program, the only actionable recommendation the subcommittee can make is for improvements in Mass's relations with the data users. The NASS agricultural chemicals program should host more frequent and organized user group meetings. Regular feedback should be solicited from agricultural chemical companies, academic and institutional researchers, and commodity and farm groups. These meetings will empower users to provide feedback to NASS and allow NASS to apprise users of proposed changes to the program early in the discussion process. These meetings are a vital first step if NASS is to generate and leverage support to maintain or enhance their agricultural chemical use data.