



December 15, 2020

Chief William Richmond
Domestic Hemp Program Branch
Marketing Order and Agreement Specialty Crops Program
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Avenue, SW, STOP 0237, Room 1406
Washington, D.C. 20250-0237

Re: Survey of Hemp Producers and Production Trends {Docket No. AMS-SC-20-0071}

This comment provides the response of the National Propane Gas Association (NPGA) to the Notice and requests for comments from the U.S. Department of Agriculture (USDA) and Agricultural Marketing Service (AMS) that invites public input and approval on the proposed data collection on hemp production through a producer survey.¹ AMS requests approval from the Office of Management and Budget (OMB) to collect information on hemp productions via survey to provide necessary information on the industry and to assist in administering the domestic hemp program.

NPGA is the national trade association of the propane industry with a membership of about 2,600 companies, and 38 state and regional associations representing members in all 50 states. NPGA's membership includes retail marketers of propane gas who deliver the fuel to the end user, propane producers, transporters and wholesalers, and manufacturers and distributors of equipment, containers, and appliances. Propane gas is used in millions of installations nationwide for home and commercial heating and cooking, in agriculture, in industrial processing, and as a clean air alternative engine fuel for both over-the-road vehicles and industrial lift trucks.²

NPGA is comprised of members that currently provide propane and propane equipment to service the hemp industry. As the number of hemp operations increase along with the demand for propane to meet the needs of these operations, additional information is necessary to continue and grow the propane industry's services. NPGA requests that AMS include the following questions to the appropriate sections of the hemp survey. We also suggest the AMS reduce estimated burden times by providing the hemp survey to be submitted electronically via AMS's IT system.

Second Section: Questions about production costs and practices; e.g. seed, labor, fertilizer, licensing fees, and testing³ -

- Production supplies similar to fertilizer, like fuel demand for crop drying:
 - How many BTUs per acre is necessary to dry hemp?
 - Do hemp farms purchase dryers for operation at their farm, or rely on a separate entity to dry crops?

¹ Department of Agriculture, Agricultural Marketing Service, Domestic Hemp Production Program, Request for Approval of a New Information Collection, 85 Fed. Reg. 201, 65788 (proposed Oct. 16, 2020).

² NATIONAL PROPANE GAS ASSOCIATION, TODAY'S PROPANE (2017), available at <https://npga.wpengine.com/wp-content/uploads/2017/08/NPGA-Todays-Propane-2017.pdf>.

³ *Supra* note 1, at 65788.

- Is mechanically drying necessary every season? What is the optimum moisture content? Does that optimum adjust depending on end-use; e.g., does hemp used for clothing require more moisture than hemp used for other textiles?
- What is the growth or interest in utilizing greenhouses to expand crop production all year rather than operate seasonally like corn, for example?

Third Section: Questions about contracting and marketing practices⁴ –

- Are end-use sales contracted before the harvest season, after, or a combination thereof?
- What is the percentage of international export?

Fourth Section: Questions about demographic information⁵ –

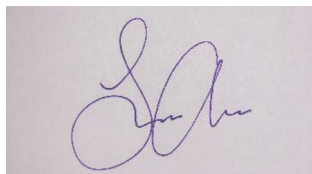
- Does the hemp farm have experience farming another crop and if so what crop?
- What region of the U.S. has the highest amount of hemp harvested? In relation, AMS can rank states in order of greatest volume of total hemp harvested by bushel.

Also, below are NPGA's responses to the specific questions posed in the ICR.⁶

1. Yes, the proposed collection is necessary for the performance of AMS's functions.
2. Yes, the estimated burden times are accurate.
3. N/A
4. The estimated burden time could be reduced if the forms were available to fill in and submit electronically via AMS's IT network. Implementing this feature would permit producers to submit surveys faster and create an efficient administrative process.

Approval of the information collection is a sensible request to understand the hemp industry and effectively administer the domestic hemp program. We encourage OMB to incorporate the additional questions proposed in this comment, and swiftly approve the information collection request to assist AMS. To improve the operational efficiency of AMS, we urge AMS to provide the surveys electronically and integrated into the AMS IT system for the domestic hemp program. This adjustment will decrease the burden for producer respondents. It will also improve the overall efficiency of the domestic hemp program.

Sincerely,



Twana Aiken
Manager, Regulatory Affairs
National Propane Gas Association

⁴ *Id.*

⁵ *Id.*

⁶ *Id.*