



**Administrative Chair**  
**Robin Charlton**  
 Valent U.S.A. LLC  
 4600 Norris Canyon Road  
 San Ramon, CA 94583  
 Ph: (925) 256-2820  
 Fax: (925) 817-5904  
 robin.charlton@valent.com

**Technical Chair**  
**Tilghman Hall**  
 Bayer CropScience  
 2 T.W. Alexander Dr.  
 Research Triangle Park, NC 27709  
 Ph: (919) 549-2236  
 Fax: (919) 549-3906  
 tilghman.hall@bayer.com

**Project Manager**  
**Bernalyn McGaughey**  
 Compliance Services Int'l.  
 7501 Bridgeport Way West  
 Lakewood, WA 98499  
 Ph: (253) 473-9007  
 Fax: (253) 473-2044  
 BMcGaughey@ComplianceServices.com

August 31, 2021

*Submitted via email to ombofficer@nass.usda.gov*

**RE: Comments on OMB Control Number: 0535-NEW; National Conservation Practice Adoption Motivations Survey**

Dear USDA-NASS:

The FIFRA Endangered Species Task Force (“FESTF”) is pleased to have the opportunity to respond to the United States Department of Agriculture National Agricultural Statistics Service (NASS) solicitation of comments on NASS’s intent to conduct a new information collection to gather data related to the motivations of targeted operators to adopt conservation practices. FESTF is comprised of 17 crop protection and non-crop pesticide product registrant entities that represent the full range of basic research and development and generic pesticide companies who manufacture and sell pesticide products in the United States (see list of companies in footer). FESTF was formed in 1997 to respond to regulatory requirements for federally listed (“listed”) species data imposed by the U.S. Environmental Protection Agency (EPA) under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and pursuant to the Agency’s implementation of its responsibilities under the Endangered Species Act (ESA). FESTF investigated means of meeting EPA’s pesticide registration requirements, implemented a program to allow member companies to develop and submit data in response to those requirements, and will carry out this program to its completion. More information about FESTF can be obtained from the website <https://festf.org>.

FESTF offers the following input on two of the specific areas that NASS invited comment:

*Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility*

FESTF sees practical utility in the information proposed for collection in the FIFRA/ESA assessment and consultation process. Conservation practices implemented on cropland may serve to mitigate the potential impact of pesticides on ESA-listed species and the more information that is collected on the types of conservation practices, where they are implemented, and why, the better-informed assessment of potential impacts to ESA-listed resources from activities such as pesticide use will be. Additionally, understanding factors that motivate farmers to adopt conservation practices, especially those that limit

**MEMBER COMPANIES**

ADAMA Agricultural Solutions, Ltd.	Corteva Agriscience	Nichino America, Inc.	Syngenta Crop Protection, Inc.
AMVAC Chemical Corp.	Dow DuPont Operations	Nippon Soda Co., Ltd.	UPL Ltd.
BASF Corp.	FMC Corporation	Nissan Chemical Corporation	Valent U.S.A. LLC
Bayer CropScience	Gowan Company, LLC	Nufarm Americas, Inc.	
	ISK Biosciences Corp.	PBI-Gordon Corporation	

the movement of pesticides off field, will be valuable data in gaining an overall understanding about how and why conservation decisions are made.

*Ways to enhance the quality, utility, and clarity of the information to be collected*

To help enhance the quality, utility, and clarity of information, FESTF recommends that questions in the National Conservation Practice Adoption Motivation Survey include specifics related to the types of conservation practices being implemented and location data representing where such practices are implemented within a given field. Spatially representing the location of conservation practices would allow these data to be combined with spatial data representing the location of ESA-listed resources to gain a better understanding about conservation measures and their benefits. It is also important to express the results in ways that can be quantitatively assessed or applied to additional analysis such as the evaluation of pesticides on ESA-listed species.

Since 1996, FESTF has contributed to the aggregation of data used in listed species processes responsive to FIFRA/ESA assessment and consultation and has developed and continues to develop tools and aggregated data to address endangered species concerns under FIFRA and ESA. In doing so, we have gained great depth in knowledge about what data are important to endangered species assessments and how those data can be applied to the assessment and consultation process, including the development of potential mitigation strategies such as conservation practices. We appreciate NASS's efforts to better understand the motivations that drive conservation adoption and encourage NASS to recognize the utility of such data in the FIFRA/ESA process and consider the ways suggested here to enhance its quality and utility. FESTF also offers support to any data collection and collaborative activities that can further improve the context, implementation, and success of conservation strategies related to pesticides, FIFRA registration actions, and ESA-listed resources.

Sincerely,

A handwritten signature in black ink that reads "Robin Charlton". The signature is written in a cursive, flowing style.

Robin Charlton, FESTF Administrative Chair