



May 6, 2008

NASS Clearance Officer
U.S. Department of Agriculture
Room 5336A, Mail Stop 2024 South Bldg
1400 Independence Ave
Washington, DC 20250-2024

RE: Notice of Intent to Seek Approval to Revise and Extend an Information Collection. 73 FR 11613. March 4, 2008. Docket No. 0535-0218.

Dear Sir or Madam:

CropLife America is the nation's largest trade organization for agriculture and pest management, representing the developers, manufacturers, formulators and distributors of virtually all the crop protection products used by American farmers and growers. We submit these comments on the subject Federal Register notice.

- (a) We believe that the proposed collection of information is essential for the proper functions of the Department of Agriculture. USDA must have accurate and timely information on the use of resources to support agricultural production in order for government, agricultural producers, supporting industries, and society to plan properly to make those resources available. The justification is clearly spelled out in supporting documents.

We encourage NASS to reinstate the vegetable chemical use survey, and to provide adequate resources supporting a regular, timely schedule for chemical use surveys of the various crop categories. Such surveys serve numerous vital interests for agricultural producers, federal and state regulators, and agricultural support industries. The chemical use information helps determine the contribution of crop nutrition and protection inputs to overall yields, and confirm their value to America's agricultural economy. The surveys are essential to support the regulatory programs that protect the health and safety of agricultural producers and the consuming public.

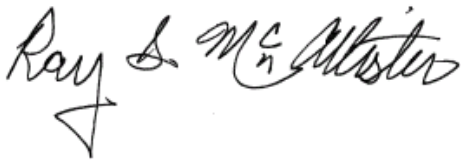
We would look forward to providing additional comments on items (b), (c), and (d), requested in the Federal Register notice (accuracy of the burden estimate, enhancing the information to be collected, and minimizing the burden), when the ICR is completed and made publicly available.

We would appreciate more clarity on the intent of the Federal Register notice. It is uncertain whether a subsequent completed ICR will be made available for public comment, and on what schedule. A reading of the notice raises the following questions:

- The FR notice that USDA plans to revise and extend a currently approved information collection. Has the ICR already been completed and submitted to OMB? Is it now available for public comment? If not, when will that happen?
- Will the vegetable chemical use survey be rescheduled?
- What is the status of chemical use surveys for other crop categories?
- What relationship does the ARMS Phase II survey bear to the 2008 Field Crops Chemical Use report which is being dropped? Has other information for that report already been collected, which will not be available?
- Without the chemical use surveys, how will USDA fulfill its obligations under 7USC §136i-2 – Collection of pesticide use information?
 - (a) In general — The Secretary of Agriculture shall collect data of statewide or regional significance on the use of pesticides to control pests and diseases of major crops and crops of dietary significance, including fruits and vegetables.
 - (b) Collection — The data shall be collected by surveys of farmers or from other sources offering statistically reliable data.
 - (c) Coordination — The Secretary of Agriculture shall, as appropriate, coordinate with the Administrator of the Environmental Protection Agency in the design of the surveys and make available to the Administrator the aggregate results of the surveys to assist the Administrator.
- How will the “economy-wide estimates of Gross Domestic Product” suffer without the information that will be lost from the fall ARMS Phase II survey that is being dropped?

We look forward to answers to these questions, and further opportunity to provide input on the NASS surveys.

Sincerely,

A handwritten signature in black ink, reading "Ray S. McAllister". The signature is written in a cursive, flowing style. Below the signature is a small, simple geometric mark resembling a triangle or a stylized 'A'.

Ray S. McAllister
Regulatory Science & Policy Leader