

MCFA

Minor Crop Farmer Alliance

November 29, 2011

VIA ELECTRONIC MAIL AND USPS

Desk Officer for Agriculture
Office of Information and Regulatory Affairs
Office of Management and Budget (OMB)
New Executive Office Building
725 17th Street, NW
Washington, DC 20503

Re: Review of Information Collection Request Pursuant to the Provisions of the Paperwork Reduction Act of 1995. 44 U.S.C. 3501 *et seq.*

Dear Sir/Madam:

The following comments are submitted on behalf of the members of the Minor Crop Farmer Alliance (MCFA) in response to the October 31, 2011 Federal Register notice (76 Fed. Reg. 67129) concerning the information collection request (ICR) applicable to the National Agricultural Statistics Service (NASS) Agricultural Resource Management Study, the Fruit and Vegetable Chemical Use Survey, and the Postharvest Chemical Use Survey (collectively the Surveys).

MCFA is an alliance of national and regional organizations and individuals representing growers, shippers, packers, handlers, and processors of various agricultural commodities, including food, fiber, nursery, and horticultural products, and organizations involved with public health pesticides. Our members are extremely interested in the development of pest management tools including pesticides and techniques that are environmentally sound. While our commodities are often called "minor crops," they are vitally important components in our diets and they contribute to safe and aesthetic surroundings for our homes, schools, and places of business. U.S. farmers grow more than 500 types of fruit, vegetable, tree nut, flower, ornamental nursery, and turf grass crops in addition to the major bulk (row) commodity crops. Specialty crop production accounts for more than \$60 billion, or approximately 40% of total U.S. crop receipts.

MCFA's members strongly support the NASS Surveys and the approval of the ICR. The Surveys provide detailed information on chemical use and pest management practices for various agricultural commodities, including specialty crops. The Surveys are the only publicly available source of certain chemical use information. As you have correctly noted, the Surveys greatly

assist NASS in carrying out one of its primary objectives in providing the public “with timely and reliable agricultural production and economic statistics, as well as environmental and specialty agricultural related statistics” (76 Fed. Reg. 67129). The Surveys include information reflecting on-farm and post-harvest fertilizer and chemical use and pest management practices. These Survey data and statistics have a variety of important uses. For example, these data are used by the Environmental Protection Agency (EPA) to conduct risk analysis regarding the potential environmental impact and worker exposure to various chemicals. The data are also used by industry organizations and the EPA for economic impact analysis and improved product labeling. The information provided by the Survey has played an important role in the pesticide registration and re-registration review process. Further, the Surveys are also a key source of information for commodity groups in identifying maximum residue limit (MRL) needs when exporting fresh or processed products to foreign countries. That information helps determine whether existing MRLs are sufficient or whether they need to be adjusted to reflect residues on exported foods. The information helps assure the quality of the U.S. food supply for US and foreign consumers.

MCFA believes that the subject ICR should be approved by OMB. It does not represent a significant burden for our members that participate in the Surveys. Further whatever limited burden might be attendant to participating in the Surveys, is greatly outweighed by the significant benefits from them.

MCFA appreciates the opportunity to provide these comments.

Very truly yours,



Daniel A. Botts

Chairman of the Technical Committee

cc: Departmental Clearance Office
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