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April 26, 2019

Dear Mr. Hancock:

In response to the NASS Notice of Intent To Request Revision and Extension of a Currently Approved Information Collection for Title: Organic Survey, OMB Control Number: 0535-0249, Mercaris Corporation is submitting the following comments.

General Comments:

Mercaris is delighted that NASS will continue their important work by embarking on an Organic census of Agriculture for 2019. Mercaris supports NASS's plan to remove the "GMO Presence in Organic Crops" and the "Production Expenses" sections that were included in the 2014 questionnaire.

Still, Mercaris would like to see questions related to organic land rent. We are especially keen to learn the average land rent cost as well as rent terms as they relate to this specialized area of agriculture.

Mercaris would also like to see questions related to on-farm storage. Namely—does the farm have on-farm storage and if so, what is the capacity range? This question is applicable to every organic commodity and will help the industry to better understand stock numbers.

The following comments are based off of the 2014 ORGANIC SURVEY Census of Agriculture Special Study, OMB No. 0535-0249.

1. Section 1: Operation Information
2. Section 2: Organic Field Crops
 - a. Question 2: Bullet Four:
 - i. Please specify what crop(s) this question is pertaining to. It seems to be related to hay and forage crops but we would like more clarification.
 - b. Question 2: Details:
 - i. To better understand crop rotations that organic field crop producers utilize, we would like to see this section updated to include columns asking:
 1. Organic acres planted (fill in the box column)
 - a. Reason: organic producers will plant a cover crop as a soil amendment but will not harvest it. We would like to better understand what crops are not being harvested.
 2. Multiple cropped acres (check box column)
 - a. Reason: To better understand what acres are being multi cropped, interseeded, etc.
3. Section 3: Organic Grapes
4. Section 4: Organic Apples
5. Section 5: Other Organic Fruits, Tree Nuts, and Berries
6. Section 6: Organic Vegetables Grown in the Open
7. Section 7: Organic Vegetables Grown Under Protection

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8. Section 8: Organic Floriculture Crops, Nursery Crops, Mushrooms, Christmas Trees, and Maple Syrup
9. Section 9: Organic Acres Under Crop Insurance
 - a. Question 1: Clarify sub-question A to ask:
 - i. What percent of this operation's total organic acres were covered by RMA Insurance options in 2019?
 - ii. What percent of the operation's total organic acres were covered by non-RMA Insurance options in 2019?
10. Section 10: REMOVED IN 2019 SURVEY
11. Section 11: Organic Livestock, Poultry, and Livestock Products
12. Section 12: REMOVED IN 2019 SURVEY
13. Section 13: Organic Production Practices
14. Section 14: Marketing Practices for Organic Products
 - a. Question 1: Sub-question c:
 - i. Add elevator to description
 - b. Question 3: We believe that the mileage descriptions of locally/ regionally/ nationally/ internationally are too broad and should be better defined. Our suggested definitions are:
 - i. Locally (0-25 miles)
 - ii. Subregionally (25-100 miles)
 - iii. Regionally (100-500 miles)
 - iv. Nationally (500 miles or farther but within the United States)
 - v. Internationally
 - c. Question 5: This question should instead appear, individually in each commodity sections, as it already is, and should be removed from Section 14. Our reasoning for this is to better understand what percentage of crops are production contracted in mixed operations. Certain organic operations, for example dairy production, are commonly produced under production contract and many of these operations are also growing grain for their operations, which would not be under a production contract. This question, as it stands now, would not accurately capture that nuance.
15. Section 15: Other Information
16. Section 16: Transitional Acreage
17. Section 17: Conclusion

Please do not hesitate to contact us if you have any questions or require further clarification regarding our comments.
Regards,

Mercaris

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