

May 20, 2008

Mr. Ed Schafer, Secretary  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Dear Secretary Schafer:

On behalf of the undersigned organizations and individual, we are writing to urge you to restore the capacity of the USDA's National Agricultural Statistics Service (NASS) to provide regular and reliable information on agricultural chemical use in the U.S.

NASS has regularly collected and published agricultural chemical use data since at least 1991,<sup>1</sup> but has dramatically scaled back its program in recent years. First, the agency replaced its annual surveys of major field crops with biennial ones. Then, in the 2007 growing season, data collection was limited to just three crops—cotton, apples and organic apples. Now, NASS has taken the most drastic step—announcing that it will not collect agricultural chemical use data on any crops during the 2008 growing season.<sup>2</sup>

NASS's Agricultural Chemical Usage reports are the only reliable, publicly available source of data on pesticide and fertilizer use outside of California. Elimination of this program will severely hamper the efforts of the USDA, the Environmental Protection Agency (EPA), land grant scientists, and state officials to perform pesticide risk assessments and make informed policy decisions on pesticide use. In particular, USDA and EPA will have difficulty tracking their progress in meeting their policy commitments to reduce the use of hazardous pesticides through adoption of Integrated Pest Management (IPM) practices and to support IPM research.<sup>3</sup>

Many of the undersigned organizations are regular, and in some cases heavy, users of pesticide data from the NASS program. In addition, we all depend upon NASS's objective data to educate the public about pesticide use and represent the public interest in pesticide and pest management policy decisions.

Agricultural chemical usage data generated by private firms such as Doane or Crop Data Management Systems are both extremely expensive and unreliable, and thus are no

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<sup>1</sup> See [http://www.nass.usda.gov/Statistics\\_by\\_Subject/Environmental/index.asp](http://www.nass.usda.gov/Statistics_by_Subject/Environmental/index.asp). For field crops, see <http://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1560>.

<sup>2</sup> According to an April 29, 2008, email communication from Douglas Farmer, NASS statistician, to Charles Benbrook, 2007 data will cover only cotton, apples and organic apples. In past years, NASS has provided agricultural chemical usage data for a much broader range of commodities. For NASS's intention to discontinue all collecting and reporting of agricultural chemical usage data in 2008, see: "NASS Update: What's New and What's Changing," National Agricultural Statistics Service, p. 4, available at: <http://www.cfare.org/updates/07NASS%20Update.pdf>.

<sup>3</sup> See "Agricultural Pesticides: Management Improvements Needed to Further Promote Integrated Pest Management," Government Accounting Office, GAO-01-815, August 2001, at <http://www.gao.gov/new.items/d01815.pdf>.

substitute for NASS's program. For instance, Doane data cost upwards of \$500,000 per year, well beyond the financial resources of our organizations. Even at these prices, the companies severely limit subsequent use and reporting of results derived from analytical work using their data. State governments also find these data too expensive. The EPA, too, has sometimes struggled to find funding to acquire these proprietary data.

Even if these proprietary data were affordable, they are of substandard quality, and the procedures used to generate them are not disclosed. As a result, these data cannot be relied upon as the basis for important regulatory and policy decisions on agricultural chemical use. According to NASS's Advisory Committee on Agricultural Statistics:

The proprietary agreements entered into by Doane subscribers extend well beyond prohibitions on data disclosure, to embargo revelation of the sampling and analytical procedures used to generate their data. Thus, it may be that a large number of the area wide estimates included in the Doane system are based on individual or statistically unrepresentative observations.<sup>4</sup>

In contrast, the Committee praises the NASS program for ensuring "a high level of data reliability and accuracy, which are the greatest advantage of NASS data. NASS employs rigorous methods to ensure that statistically representative samples are achieved."

NASS's objective and reliable data are critical to sound policy decisions on pesticide use. They are also the only publicly available resource to counter misinformation about pesticide usage and trends in American agriculture.<sup>5</sup>

The undersigned organizations urge you to make every effort to restore NASS's capacity to provide regular and frequent reports on the use of agricultural chemicals in U.S. agriculture. Specifically, we request that NASS reinstate its program of the 1990s, which involved surveys of chemical use annually on major field crops (corn, soybeans and cotton); periodically on other field crops; and biennially on fruit and vegetable crops.

We look forward to hearing from you.

Sincerely,

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<sup>4</sup> "Meeting of the Advisory Committee on Agriculture Statistics (ACAS): Summary and Recommendations," February 14-15, 2006, USDA NASS, Appendix III, at: [http://www.nass.usda.gov/About\\_NASS/Advisory\\_Committee\\_on\\_Agriculture\\_Statistics/advisory-es021406.pdf](http://www.nass.usda.gov/About_NASS/Advisory_Committee_on_Agriculture_Statistics/advisory-es021406.pdf).

<sup>5</sup> For instance, see letter of the Association of American Pesticide Control Officials (AAPCO) to Chuck Conner, Acting Secretary of Agriculture, January 7, 2008, stating that elimination of the NASS program "will perpetuate misinformation regarding actual pesticide use or trends." AAPCO represents state officials charged with enforcing laws related to pesticide use.

Alaska Community Action on Toxics  
American Association on Intellectual and  
Developmental Disabilities  
Appalachian Sustainable Development  
Beyond Pesticides  
Californians for GE-Free Agriculture  
California Institute for Rural Studies  
Center for Biological Diversity  
Center for Environmental Health  
Center for Food Safety  
Commonweal  
Community Alliance with Family Farmers  
Consumers Union  
Defenders of Wildlife  
Environmental Defense Fund  
Environmental Health Fund  
Environmental Working Group  
Farmworker Association of Florida  
Food & Water Watch  
Glynn Environmental Coalition  
Greenpeace  
Health Care Without Harm – Boston  
Institute for Agriculture and Trade Policy  
IPM Institute of North America  
Land Stewardship Project  
Maine Organic Farmers and Gardeners  
Association  
Minnesota Center for Environmental  
Advocacy

National Center for Appropriate Technology  
(NCAT)  
National Organic Coalition  
Natural Resources Defense Council  
Nebraska Wildlife Federation  
Northwest Coalition for Alternatives to  
Pesticides (NCAP)  
Organic Farming Research Foundation  
Pesticide Action Network North America  
Rachel Carson Council, Inc.  
ScienceCorps  
Sierra Club  
Southern Sustainable Agriculture Working  
Group  
Strategic Counsel on Corporate  
Accountability  
Sustainable Agriculture Coalition  
TEDX (The Endocrine Disruption  
Exchange)  
The Organic Center, Dr. Charles Benbrook,  
Chief Scientist  
Union of Concerned Scientists  
Virginia Association for Biological Farming  
World Wildlife Fund  
  
Ken Tschumper, Minnesota State  
Representative (District 31B)

cc:

Stephen Johnson, Administrator, Environmental Protection Agency  
Joseph T. Reilly, Acting Administrator, USDA National Agricultural Statistics Service  
Kitty Smith, Administrator, USDA Economic Research Service  
Allen L. Jennings, Director, USDA Office of Pest Management Policy  
Lloyd C. Day, Administrator, USDA Agricultural Marketing Service  
Robert Epstein, Deputy Administrator, USDA Agricultural Marketing Service, Science and  
Technology Programs  
Ann Wick, President, Association of American Pesticide Control Officials

The Honorable Nancy Pelosi, Speaker of the House  
The Honorable Tom Harkin, Chair, Senate Committee on Agriculture, Nutrition and Forestry  
The Honorable Collin Peterson, Chair, House Committee on Agriculture  
The Honorable Herb Kohl, Chair, Senate Agriculture Appropriations Subcommittee

The Honorable Rosa DeLauro, Chair, House Agricultural Appropriations Subcommittee  
The Honorable Patrick Leahy, Chair, Senate Subcommittee on Nutrition and Food Assistance,  
Sustainable and Organic Agriculture, and General Legislation  
The Honorable Barbara Boxer, Chair, Senate Committee on Environment and Public Works  
The Honorable James Oberstar, Chair, House Transportation and Infrastructure Committee  
The Honorable Henry Waxman, Chair, House Committee on Oversight and Government Reform  
The Honorable Dennis Kucinich, Chair, House Subcommittee on Domestic Policy  
The Honorable Diane Feinstein  
The Honorable Sam Farr