

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 1991,¹ 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.²

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.³

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

¹ See 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>.

² 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>.

³ 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.⁴

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.⁵

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,

⁴ "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.

⁵ 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