

Supporting Statement - Part A

**Nursery and Christmas Tree Production Survey
and
Nursery and Floriculture Chemical Use Survey**

OMB No. 0535-0244

TERMS OF CLEARANCE:

In accordance with 5 CFR 1320, the information collection is approved for a period of two years. During this approval, the agency should work with OMB to address issues of non-response bias in these surveys. In the next request for approval, the agency must include, at the very least, a plan and timeline for addressing non-response bias. (01/28/08)

The Nursery and Christmas Tree Production Survey (NCTPS) and the Nursery and Floriculture Chemical Use Survey (NFCUS) are conducted once every three years. In the previous submission to OMB, NASS requested a three year approval (2008 - 2010), but we were only granted two years, these survey were last conducted in 2007.

In preparation for the upcoming data collection cycle, NASS has made several changes to the program. Previously, production data from the Nursery and Christmas Tree Production Survey (0535-0244) and the Commercial Floriculture Survey (0535-0093) were used to expand the data collected by the NFCUS. This has allowed us to conduct the chemical use survey as a subsample of the two production surveys. In 2010 we will be conducting the Census of Horticultural Specialty Crops Survey (0535-236), which is a mandatory survey instead of the two production surveys (floriculture and nursery) which are voluntary. The six State Field Offices (CA, FL, MI, OR, PA and TX) involved in the chemical use survey have been notified which operations in their State have been selected for both the Census of Horticulture and the chemical use survey so that they can coordinate their data collection. NASS has also extended the data collection period to allow the Field Offices more time to collect the data. This will allow field enumerators more time to schedule appointments with the growers, so that we can collect the data at the most convenient time for the respondent.

Field Office Directors (CA, FL, MI, OR, PA and TX) and survey statisticians are encouraged to work with their grower's associations in their State, to have them encourage their members to complete both the Census of Horticulture and the chemical use questionnaires. NASS headquarters is also providing a listing of organizations that use our data and how it can impact the floriculture and nursery growers if we do not have complete and accurate data.

A. JUSTIFICATION

This statement covers one triennial survey, the Nursery and Floriculture Chemical Use Survey and two smaller annual surveys. The triennial survey will be conducted in early 2010 in conjunction with the Census of Horticultural Specialties Survey (0535-0236). This statement also covers the Congressionally funded annual Nursery and Greenhouse Survey in Oregon, along with the Oregon Christmas Tree Survey which was conducted in odd-numbered years previously, but is now being requested annually. (The nursery industry is Oregon=s leading agricultural industry.) The major change to this data collection packet involves the discontinuation of the triennial Nursery and Christmas Tree Production Survey, due to the Census of Horticulture (0535-0236) being conducted during this same time period and it will provide the needed production data, that the Nursery and Christmas Tree Production Survey provided in previous collections.

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

In February 1997, the Secretary of Agriculture issued the report of the Civil Rights Action Team entitled ACivil Rights at the Department of Agriculture.@ Civil Rights Implementation Teams were subsequently formed to implement the report recommendations. One of the recommendations that was a direct outcome of the evaluation of this report was the addressing of the conditions of farm workers. The Implementation Team recognized the need for reliable pesticide use information about enterprises that involve farm workers and requested that the National Agricultural Statistics Service (NASS) obtain pesticide use information for commodities which required intensive farm labor. Consequently, Congress appropriated funds for the collection of pesticide use data on nursery and floriculture operations. This chemical data will expand the existing NASS pesticide use database which contains comprehensive annual pesticide use reports as mandated in the 1990 and 1996 farm legislation.

In 2010, NASS will use the nursery and floriculture production data obtained from the Census of Horticulture to expand the data obtained from the sub-sample of operations in the six target States (CA, FL, MI, OR, PA and TX) for the chemical use survey

General authority for these data collection activities is granted under U.S. Code Title 7, Section 2204 which specifies that "The Secretary of Agriculture shall procure and preserve all information concerning agriculture which he can obtain ... by the collection of statistics ... and shall distribute them among agriculturists."

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

Nursery and Christmas tree production data and nursery and floriculture chemical use data will be used by NASS, the Environmental Protection Agency, the nursery and floriculture industries, and other parties to assess the environmental and economic impact of various programs, policies, and procedures on nursery and floriculture operators and workers. The basic chemical use and farm practices information also will

be used to enhance the national chemical use database maintained by NASS. This database is an integral source of data necessary for on-going risk assessments related to dietary exposure to chemicals, worker safety, water quality, and ecological resources.

According to the 2007 Census of Agriculture the nursery, greenhouse, floriculture, sod, and Christmas tree industries, had total sales in 2007 just over \$17,017,000,000, up \$2,316,000,000 from the 2002 total of \$14,701,000,000. Accurate chemical application and production data will aid in determining the needs of growers, such as appropriation of research funds to target pests and diseases. Producers can better determine which crops to grow and profit from by knowing total production and crop sales as well as changes in chemical usage and application rates. Economists and researchers will be better equipped to estimate the economic impact of the industry on the U.S. economy. Since significant problems are encountered in finding adequate labor for these operations, the data collected will be relied upon when Congress considers minimum wage and migrant workers issues. Information learned will also be useful when decisions must be made regarding the economic impact on domestic producers when importers enter the U.S. market.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

Web-based data reporting has been implemented for most of the NASS information collections (a small number will be impractical or otherwise unsuitable). The Nursery and Floriculture Chemical Use Survey is one of those surveys that it is impractical to be converted to web based data collection due to the complexity of the questionnaire.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

NASS is very careful not to duplicate work planned by other Government agencies. NASS Field Offices were contacted and asked to document any State programs that overlap with the surveys contained in this docket. NASS is making every attempt to use existing data and only ask additional questions that are needed. Internal committees within USDA that include NASS, the Economic Research Service, the Agricultural Marketing Service, the Agricultural Research Service, Cooperative State Research Education and Extension Service, and the Natural Resource and Conservation Service have been formed to help coordinate all aspects of these data collection efforts. USDA's Office of Pesticide Management Policy provides coordination and oversight for the Department with EPA. The NASS Advisory Committee on Agricultural Statistics, appointed by the Secretary of Agriculture, also provided advice on this program area. This committee is composed of a diverse representation of experts from private industry, government, and universities.

Minor changes were made to the Census of Horticultural Specialties Survey questionnaire, so that the data collected through it could replace the data that would

have normally been collected with the nursery and floriculture production surveys; helping to reduce respondent burden and duplication of effort.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

Chemical data will be collected from operations with sales greater than \$10,000 of horticultural specialty crops (floriculture, nursery, Christmas trees, etc.) based on data obtained from the 2007 Census of Agriculture. Sample Design will target on the operations that have the greatest impact on this industry, so the number of small operations will be kept relatively low.

NASS tries to identify those data items absolutely necessary to answer the needs of data users. Information requested on these surveys may require respondents to refer to their records for the answers. To minimize the interview time, branching is used throughout the questionnaires to skip those sections not applicable to particular respondents. Enumerators also attend State training schools for instruction and practice on using the questionnaires. Data collection for these surveys is coordinated with other surveys to minimize contacts with respondents. Field enumerators are trained to collect the chemical data from the respondent's own records. This allows the operator to return to work while much of the data is being collected. Once all of the chemical records have been recorded, the enumerator will meet with the respondent again to collect some data regarding the overall operation of the business.

NASS has a working group currently developing a respondent burden management tracking system to monitor respondent burden across surveys. The processing system will further refine sampling procedures and management of surveys. NASS continues to conduct research on potentially new sampling and data modeling strategies to reduce data requirements and respondent burden.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

NASS is charged with the responsibility of providing the Secretary of Agriculture, the Congress, the Executive Branch, farm groups, and the public with reliable, up-to-date information concerning the Nation's farms and ranches. The Floriculture and Nursery Chemical Use Survey will be conducted every 3 years to help provide a complete picture of this agricultural sector. The nursery and Christmas tree production surveys in Oregon will resume their normal rotation in 2011.

The inclusion of floriculture and nursery chemical use into the chemical use database is needed to answer fundamental questions about the safety of our Nation's water supplies and potential worker exposure. Sound policy decisions cannot be made without reliable, unbiased data. NASS feels an adequate database can be constructed by conducting these surveys every three years. Without timely, real world data on chemical use, EPA will be forced to make maximum label rate assumptions in their chemical risk assessments. Collecting environmental data is critical to the mission of USDA, Congress, other

governmental agencies, and the private sector.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the general information guidelines in 5 CFR 1320.5.**

There are no special circumstances associated with this survey.

- 8. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

The Federal Register Notice soliciting comments was published on September 1, 2009, on pages 45161-45162. One comment was received and is attached to this document.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Other USDA agencies, other Federal Departments, and State Departments of Agriculture along with the Society of American Florists (SAF) and the American Nursery and Landscape Association (AN&LA) have been consulted and they have contributed to the content of both the nursery production surveys and the Floriculture and Nursery Chemical Use Survey.

- 9. Explain any decision to provide any payment or gift to respondents.**

There are no payments or gifts to respondents.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

All questionnaires include a statement that individual reports are kept confidential. U.S. Code Title 18, Section 1905 and U.S. Code Title 7, Section 2276 provide for the confidentiality of reported information. All employees of NASS and all enumerators hired and supervised under a cooperative agreement with the National Association of State Departments of Agriculture must read the regulations and sign a statement of compliance.

Additionally, NASS and NASS contractors comply with OMB Implementation Guidance, "Implementation Guidance for Title V of the E-Government Act, Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA), (Public Law 107-347). CIPSEA supports NASS' pledge of confidentiality to all respondents and facilitates the agency's efforts to reduce burden by supporting statistical activities of collaborative agencies through designation of NASS agents; subject to the limitations and penalties described in CIPSEA.

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

There are no questions of a sensitive nature.

- 12. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

Average completion time per questionnaire is based on previous year's surveys and the time required for other surveys of similar length. Calculation of burden hours is shown in the table below. Estimated response counts are based on an 80% target response rate.

Cost to the public for completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. Average annual reporting time of 1,940 hours are multiplied by \$24 per hour (estimated rate for business supervisor), for a total annual cost to the public of \$46,560.

Projected Annual Response Burden for 2010 - 2012

Nursery and Floriculture Chemical Use Survey

Oregon Nursery Survey

Oregon Christmas Tree Survey

Survey	Sample Size	Freq	Responses				Non-response				Total Burden Hours
			Resp. Count	Freq x Count	Min./ Resp.	Burden Hours	Nonresp Count	Freq. x Count	Min./ Nonr.	Burden Hours	
Nursery and Floriculture Chemical Use Survey											
Advance Letter for NFCUS	3,600	0.33	2,880	950	10	158	720	238	2	8	166
Enumerated Survey	3,600	0.33	2,880	950	60	950	720	238	2	8	958
Oregon Nursery Survey											
First Mailing	800	1.00	240	240	30	120	560	560	2	19	139
Second Mailing	560	1.00	140	140	30	70	420	420	2	14	84
Enumeration for non-response	420	1.00	273	273	30	137	147	147	2	5	142
Oregon Christmas Tree Survey											
First Mailing	1,000	1.00	300	300	20	100	700	700	2	23	123
Second Mailing	700	1.00	175	175	20	58	525	525	2	18	76
Enumeration for non-response	525	1.00	341	341	20	114	184	184	2	6	120
Publicity Materials for Oregon	1,800	1.00	1,440	1,440	5	120	360	360	2	12	132
Total	5,400		4,349	4,810		1,827	1,051	3,371		113	1,940

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses (equipment, overhead, printing, and staff), and any other expense that would not have been incurred without this collection of information.

The total yearly cost to the Federal Government is approximately \$1.2 million, for enumeration and other personnel costs, travel, training, data processing, printing, telephone, and postage.

15. Explain the reasons for any program changes or adjustments reported (reasons for changes in burden).

There are several changes that have resulted in an overall decrease in total burden hours. There will be a program increase of 130 hours due to the Oregon Christmas Tree Production Survey being moved to an annual survey instead of biennial. There will be a program decrease of 2,236 hours due the discontinuance of the Nursery and Christmas Tree Production Survey from this three year approval request, for an overall decrease due to program changes of 2,106 hours.

Due to a correction in the way we account for multiple mailings for the Oregon surveys and other miscellaneous issues, there will be an adjustment increase of 239 hours.

The overall total annual burden will result in a net decrease of 1,867 hours.

- 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Nursery and Floriculture Chemical Use Survey results are published after each triennial survey. The publication name will be *Agricultural Chemical Usage - 2009 Nursery and Floriculture Summary* and will be released in early 2011. The survey and estimation procedures are outlined in the back of the publication.

<http://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1570>

Nursery and floriculture production data (which previously was published in their own releases) will be published in two separate publications; one for the fifteen core floriculture States in June 2010, followed by a complete publication for all States in the Census of Horticulture release which will be published in Dec. 2010.

<http://www.agcensus.usda.gov/>

Oregon Nursery Survey results are published after each annual survey. The publication name will be the *Oregon Nursery and Greenhouse Survey* and will be published in August of every year. Oregon Christmas Tree Survey results are published after each survey. The publication name will be the *Oregon Christmas Tree Survey* and will be published in September of each year. The results of both Oregon surveys will be published at

http://www.nass.usda.gov/Statistics_by_State/Oregon/Publications/Horticulture/index.asp

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

There is no request for approval of non-display of the expiration date.

- 18. Explain each exception to the certification statement identified in Item 19, A Certification for Paperwork Reduction Act Submissions@ of OMB Form 83-I.**

There are no exceptions to the certification statement.

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