

**To: Federal Advisory Committee, National Agricultural Statistics Service,  
United States Department of Agriculture**

**From: Leonard Gianessi and Jack Mitenbuler,  
Chairpersons, Agricultural Chemical Data Program Subcommittee,  
Federal Advisory Committee, National Agricultural Statistics Service,  
United States Department of Agriculture**

**Date: February 15, 2006**

**RE: Conclusions & Statement for the Record**

Throughout the course of its work examining pesticide use data collection and the potential for improvement, the Pesticide Use Data Subcommittee of the NASS Advisory Committee considered three primary questions:

- Is there interest in creating an integrated national system for pesticide use data collection and distribution combining public and private sources of data?
- Is there a compelling problem with pesticide use data availability or coverage that is currently unaddressed by available pesticide use data sources?
- Is there a groundswell of support for a major increase in public funding for federal pesticide use data collection?

After discussion among members of the subcommittee and between the subcommittee and stakeholders, the group concluded that it could not answer these questions in the affirmative. There is no sustained interest or broad support for assembling an integrated national database of public and private pesticide use data sources. There is no recognized and compelling problem that cannot be addressed by current use data systems. There is no groundswell of interest required to increase the NASS budget for agricultural chemical programs.

In addition to chairing the NASS subcommittee, we participated in two additional groups addressing issues of pesticide use data and its improvement:

- CropLife America Pesticide Use Data Subcommittee was established to determine if there were unmet use data needs among the crop protection industry.
- CropLife Foundation held a meeting of commodity group and farm bureau representatives to discuss the need and support for pesticide use data among America's grower community.

A broad spectrum of groups from agriculture were represented throughout the subcommittee's deliberations, however one important party was mostly absent: Doane Marketing Research (Doane). Doane is the major private sector supplier of pesticide use data. Although invited, they declined to participate in both the NASS subcommittee and commodity group discussions. Doane collects pesticide use data through a survey process and delivers it to clients electronically. Their data are proprietary and

confidentiality is closely guarded. The six major agricultural chemical companies each purchase full Doane systems each year for \$500,000. EPA also buys the full Doane database for \$500,000 a year. Smaller chemical companies buy specific pieces of the Doane database for lesser amounts.

While absent from the NASS subcommittee and commodity group discussions, Doane did participate in the CropLife America Pesticide Use Data Subcommittee discussions. Their position expressed during CLA's subcommittee meetings reflected Doane's commitment to proprietary data. If improvements in available pesticide use data are needed, for whatever reason, by the industry or EPA, Doane would be happy to add these enhancements to its services. For example, EPA has provided additional funds to Doane in the past to include additional data collection parameters of interest to the agency. Likewise, if individual chemical companies have specific needs for pesticide use data on a regional or other basis, Doane has made it clear that it can meet those needs by increasing or tailoring its sampling practices.

The proprietary nature of Doane data effectively stifles the prospect of industry support for and Doane participation in an integrated and publicly available pesticide use data framework. For competitive business reasons, some companies who purchase Doane data are steadfastly unwilling to share any data generated by Doane with those companies or organizations that did not invest in the Doane system. This reluctance effectively terminated the notion of assembling a comprehensive database that integrated public and private data sources.

While Doane is and will remain the crop protection industry's primary private source of pesticide use data for the near future, other private sector sources are available and growing. For example, Crop Data Management Systems (CDMS) is expanding its coverage through agreements with food processors, chemical companies, and agricultural distributors and retailers. These agreements allow CDMS to incorporate use data from the growers of certain crops and clients of participating retailers/distributors within geographic regions into a full reporting system. This system can then assemble proprietary, area-wide pesticide use reports.

After examination of Doane, CDMS, and other pesticide use data systems, the CropLife America subcommittee concluded that the needs of the industry can be met by private sector, specifically fee based enhancements to Doane proprietary data. Industry's conclusion was buttressed by EPA's purchases and extensive use of Doane data.

To assess the role Doane data plays in pesticide regulation, EPA was questioned about its use of this proprietary data. EPA was asked if it is acceptable to use proprietary and confidential usage data in public rulemaking. EPA was also asked to consider the likelihood that it will be required to discontinue the use of proprietary data. EPA responded that it frequently uses proprietary information on a confidential business information basis, that this was a vital practice for protection of commercial privacy and competitive interests and it will continue to use proprietary information in the future.

EPA uses publicly-available use data as well. EPA uses all the available data that it can collect.

EPA was asked to describe the value of Doane data to its operation and its willingness and ability to sustain the annual investment required by Doane. While an expenditure of this magnitude is never certain, Doane data are integral to operation of EPA's Office of Pesticide Programs. Beyond provision of basic pesticide use parameters, Doane data includes many additional variables of use to EPA. Information collected by Doane on target pests, timing of applications, product competition within the same market, and use of combination products allow EPA to better characterize pesticide use and place risk assessments within proper agricultural production contexts. These additional variables provide information to EPA that is not available in the NASS or other public sources of pesticide use data.

EPA regularly employs NASS pesticide use data in its risk assessments. EPA acknowledges the importance of usage data and its necessity in refining overly conservative assumptions that underlie initial risk assessments. Further, EPA believes that currently available pesticide use data systems, while not ideal, are sufficient to fulfill their needs now and in the foreseeable future. When EPA needs data not available in the NASS or Doane databases, the Agency asks USDA and commodity groups to provide the desired information.

USEPA does not have sufficient, consistent funds to support expanding the USDA NASS chemical use survey. EPA works closely with USDA NASS on its chemical use surveys and summary reporting. USDA NASS has been very responsive to EPA requests. The recent publication by NASS of pesticide use rate distributions for vegetables and field crops is a good example of NASS and EPA collaboration.

We could not identify a problem that the various stakeholders felt could not be addressed by the current process. Some analysts believe that the increasing need for use data at a regional or watershed level could not be met with the current system, but private sector representatives offered assurance that it could be. Two issues in particular that are of concern to EPA include the lack of public accessibility of the Doane data which limits the extent of the use of the data by EPA and the lack of reporting of pesticide use data at a geographic level smaller than the state (e.g., county or watershed).

The Office of Pest Management Policy (OPMP) at USDA employs NASS agricultural chemical use data when helping EPA to address the scope of pesticide use during risk assessment and regulatory processes. OPMP uses NASS to specify in which states and on which crops a pesticide of interest to EPA is used. NASS data are frequently augmented with other data parameters including application timing, target pests, etc. that is collected informally from university extension specialists and commodity groups. OPMP has released a large number of crop profiles and pest management strategic plans which contain a large amount of qualitative data on pesticide use. While OPMP would

rather this data be supplied by NASS, it, like EPA, is unable to engage in major efforts or contribute funds to expand the NASS agricultural chemical program.

During the subcommittee's assessment of support for current NASS pesticide use data and the potential for its expansion, a meeting was held with commodity groups and farm bureau representatives. Not only are these groups important stakeholders with respect to any agricultural issue, their lobbying skills and constituency would be needed to generate the popular and political support necessary to motivate and enact enhancement of NASS. After discussion, it became clear that expansion of government pesticide use data programs is not a priority for them. While these organizations use and appreciate currently available NASS use data, they will not devote the resources needed to advance the expansion for several reasons:

- Commodity groups and Farm Bureau do not have unfulfilled needs for pesticide use data. These organizations do not face crises that require comprehensive and public pesticide use data and, when needed, they have alternate sources through which data can be generated.
- In order to generate expanded funding necessary to enhance the agricultural chemical data program, the budgets of other programs within NASS, USDA, or other federal agencies would need to be cut. Marshaling the political will to reduce federal budgets requires a clearly-defined and impending problem, which, in the eyes of commodity groups and Farm Bureau, does not currently exist.
- Although commodity groups and Farm Bureau support current NASS pesticide use data efforts, that support may be strictly nominal. In recent years the NASS agricultural chemical data program has contracted; extending the sampling for some crops to longer rotations and eliminating others from the survey entirely. After budgetary constraints forced NASS to eliminate nut crops from their pesticide use data survey, staff anticipated outrage complaints from nut crop commodity organizations and other data users; however, NASS did not receive any such objections, outraged or otherwise. This silence indicates that not only is expansion of NASS pesticide use data infeasible, but support for the program in its current state is quite soft until a crisis occurs.

The inability to garner support for enhancement of pesticide use data is compounded by the expense of generating data in the public domain. Data available in the private sector is generated at a fraction of the cost of NASS program while providing far more data variables. Although the expense of producing public data is a barrier to improving the NASS program, the processes that require such expenditures ensure 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. The same can not necessarily be said for pesticide use data generated by Doane and other companies and used by EPA and chemical companies. The proprietary agreements entered into by Doane subscribers extend 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. The subcommittee and other interested organizations have attempted to illuminate these

practices and examine discrepancies between Doane and NASS data that may result. These attempts have been unsuccessful as Doane declined to participate in such a review even on an aggregate level where no individual proprietary estimates would be revealed.

After having examined the current role of NASS agricultural chemical usage data, exploring future needs for public pesticide use data, and assessing support for enhancing the NASS program, the only actionable recommendation the subcommittee can make is for improvements in NASS's relations with the data users. The NASS agricultural chemicals program should host more frequent and organized user group meetings. Regular feedback should be solicited from agricultural chemical companies, academic and institutional researchers, and commodity and farm groups. These meetings will empower users to provide feedback to NASS and allow NASS to apprise users of proposed changes to the program early in the discussion process. These meetings are a vital first step if NASS is to generate and leverage support to maintain or enhance their agricultural chemical use data.

Notwithstanding the variety, volume and different analytical and qualitative techniques applied to pesticide collection and analysis efforts; today, the amount of and quality of crop pesticide application data can at least be characterized as adequate. None of the industry, academic or regulatory stakeholders is aggressively and energetically calling for an overhaul of the status quo. Some day, in the event of a crisis - either real or perceived - then the indispensable enthusiasm necessary to implement major improvements in the quantity and the quality of pesticide data analysis may develop.

In the meantime, we believe the initiative for a paradigm change and hopefully an improvement in the availability and quality of crop pesticide application data is on a plateau. Furthermore, until an event or crisis precipitates a greater sense of urgency around pesticide information, the sub committee has taken the appraisal of future opportunities to a practical end point.