Giving Crop Advisors a Voice
USDA Pesticide Use and Usage Surveys

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Another survey?!

• Yes...but this one’s a little different than other USDA surveys

• Aims to give agricultural experts and growers a voice regarding the benefits of pest management tools

• Required by 2018 Farm Bill

• ICCA is partnering with USDA

• May reduce unnecessary label mitigations and preserve the use of pest management tools

• Completely voluntary
Surveys to be Conducted by USDA’s Office of Pest Management Policy (OPMP)

• Represents agricultural interests related to pest management.

• We help EPA put together the ‘pieces of the puzzle.’

• OPMP consults with experts in the field to obtain current, real-world information.

• USDA’s National Agricultural Statistics Service (NASS) is collaborating.
How OPMP Collects Expert Feedback

• **Currently:** Can only go to 9 or fewer respondents
  - Paperwork Reduction Act requirement
  - Does not capture niche benefits and usage needs

• **Moving Forward:**
  - 2018 Farm Bill asks that OPMP expand surveying efforts
  - First need permission from the Office of Management and Budget to conduct this work
  - Surveying will likely begin in 2020
Nature of Requests

• Quick turnaround!
  ➢ EPA typically has quarterly 60 day comment periods.
  ➢ EPA often comes to USDA before the comment period with specific information requests.

• Types of Questions
  ➢ Specific to EPA mitigations that are being deliberated
  ➢ Technical in nature
  ➢ Typically easy to answer (e.g., application rates, problematic pests)
Example

• EPA had the following enforceable spray drift management language on their pesticide labels:

  "Do not apply when wind speeds exceed 10 mph at the application site".

• USDA reach out to agricultural experts to explore the real-life implications from this requirement

• In some regions or some seasons of the year, wind speed regularly fluctuates and may exceed 10 mph during periods when a pesticide must be applied to achieve effective pest control.

• Wind speeds can also sporadically exceed 10 mph during an application which could put the user in violation of the label.

• Such restrictions could impact timing of application, lead to poor efficacy, and select for resistance.

• OPMP’s outreach and feedback from the agricultural community led to EPA agreeing to a 15 mph restriction.
What to Expect

• Surveys will likely be sent out via e-mail.
• Can opt out to not be contacted in the future.
• Will not be contacted more than quarterly, likely more infrequently.
• 10 or fewer technical questions.
• A limited number of sociodemographic questions may also be asked
  ➢ e.g., States you operate in, crop(s) you consult for, approximate acreage
  ➢ Over time, this will allow us hone in better on who to contact for certain situations
• Voluntary
• No Personally Identifiable Information (PII) will be collected
• Results will be aggregated up to the state level
• If sub-state level niche benefits exist, information will not be relayed in a way that indicates the location of an operation
Could Responding Make Matters Worse?

• Short Answer: No!

• Office of Management and Budget requires that survey efforts of this nature **CANNOT** make respondents worse off

• May still see mitigations if benefits argument isn’t robust enough to offset risks—however this not a function of responding to the survey.

• Some risks are too substantial to be offset by benefits
How Will You Know If You Made a Difference?

- You won’t see a change on the label!
- We will do our best to notify ICCA when we know your comments avoided or reduced the extent of pesticide mitigations.
- Especially important to respond to specialty crop inquiries or for localized, niche uses
Next Steps

• Proposed outreach will likely start in 2020
• Currently undergoing OMB approval process
• For thoughts or feedback, e-mail:
  
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