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May 26, 2020

Docket Clerk, U.S. Department of Agriculture,  
Office of the Chief Economist, Office of Pest Management Policy  
1400 Independence Avenue SW  
Room 3871-South Building, Mailstop 3817  
Washington, DC 20250.

Re: USDA\_FRDOC\_0001; USDA-2020-0005; *Agency Information Collection Activities; Proposals, Submissions, and Approvals: Generic Clearance to Conduct Multiple Crop and Pesticide Use Surveys*

The National Cotton Council (NCC) is the central organization of the United States cotton industry. Its members include producers, ginner, cottonseed processors and merchandizers, merchants, cooperatives, warehousemen and textile manufacturers. A majority of the industry is concentrated in 17 cotton-producing states stretching from California to Virginia. U.S. cotton producers cultivate between 10 and 14 million acres of cotton with production averaging 12 to 20 million 480-lb bales annually. The downstream manufacturers of cotton apparel and home furnishings are located in virtually every state. Farms and businesses directly involved in the production, distribution and processing of cotton employ more than 125,000 workers and produce direct business revenue of more than \$21 billion. Annual cotton production is valued at more than \$5.5 billion at the farm gate, the point at which the producer markets the crop. Accounting for the ripple effect of cotton through the broader economy, direct and indirect employment surpasses 280,000 workers with economic activity of almost \$75 billion. In addition to the cotton fiber, cottonseed products are used for livestock feed and cottonseed oil is used as an ingredient in food products as well as being a premium cooking oil.

The Office of Pest Management Policy (OPMP) of the United States Department of Agriculture (USDA) requests approval from the Office of Management and Budget (OMB) for generic clearance that will allow OPMP to collect information from agricultural entities. The primary purpose of this information will be to support OPMP's understanding of agricultural practices pertaining to pest management. OPMP is undertaking this effort to satisfy legislative requirements outlined in Title X, Section 10109 of the 2018 Farm Bill, which mandates that the Secretary of Agriculture, acting through the Office of the Chief Economist's Director of OPMP, collect this information.

Data collected are intended to capture agricultural practices and needs to support Federal activities that pertain to pest management, which are typically time-sensitive and necessitate the need for rapid data collection.

In most cases, the turnaround time for these information collections will be a function of 60-day public comment periods associated with pesticide licensing actions, making it essential for OPMP to promptly administer requests and collect responses. Various factors drive what types of questions OPMP may ask, including the active ingredient, intended crop use, region, application method, and specific target pest problems. Examples of questions include inquiries regarding pesticide usage, the availability and comparative utility of alternative pest management tactics for target pests, and resistance management concerns. Further, OPMP often needs to understand niche pest situations on specific crops and/or regions, which typically is not information that is readily available. In certain cases, a single information collection may be administered to pest management advisors across several active ingredients for a use site. This would avoid multiple outreach efforts to the same respondents, reducing both respondent and government burden.

The U.S. cotton industry has a good working relationship with OPMP. The volume of area- or regional-specific pest issues adds an overwhelming complexity to discussions of pest management practices, therefore this type of survey is a needed practice. NCC believes the proposal is necessary and the information collected will have practical utility. We find no obvious fault with the agency's estimate of the burden for collecting the information, however we believe the agency needs to be aware that during 'busy seasons' in agriculture, the proposed respondents will have less time to spend on responding to these surveys. Therefore, we urge the agency to make the survey process as short and as easy to respond to as possible, such as, for example, some sort of web-based or phone response system.

Thank you for this opportunity to provide comments supporting this important issue.

Respectfully submitted,

A handwritten signature in black ink that reads "Steve Hensley". The signature is written in a cursive, flowing style.

Steve Hensley  
Senior Scientist, Regulatory and Environmental Issues