



CCOF

Organic Certification

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Ms. Michelle Arsenault
Advisory Committee Specialist
National Organic Standards Board, USDA-AMS-NOP
1400 Independence Ave. SW., Room 2642-S, Mail Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-16-0100-0001

Re: Crops Subcommittee Discussion Document: Aeroponics/Hydroponics/Aquaponics

March 30, 2017

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Crop Subcommittee's Discussion Document "Aeroponics/Hydroponics/Aquaponics."

CCOF is a nonprofit organization governed by the people who grow and make our food. Founded in California more than 40 years ago, today our roots span the breadth of North America. We are supported by an organic family of farmers, ranchers, processors, retailers, consumers, and policymakers. Together, we work to advance organic agriculture for a healthy world.

CCOF certifies about 130 hydroponic and container-based systems. These operations implement biologically-based nutrient cycling practices and use a whole systems approach to crop production. CCOF verifies their practices through the annual inspection process and incorporates the nuanced requirements of the 2010 NOSB recommendation, *Production Standards for Terrestrial Plants in Containers and Enclosures*, into its certification processes.

It is time for the ongoing debate about hydroponic systems to evolve into a proactive discussion on certification and labeling requirements. The NOSB should shift its focus from what to prohibit and instead focus on what to *require* of these unique systems. Strong, clear standards ensure greater consistency among certifiers and improve implementation of organic principles. NOSB should also explore labeling requirements as a solution to concerns about transparency and consumer expectations. CCOF looks forward to working with NOSB to clarify standards and evaluate labeling options.

Detailed comments follow. Please do not hesitate to contact me for further information.

Sincerely,

Kelly Damewood
Director of Policy and Government Affairs

cc: Cathy Calfo, Executive Director/CEO
Jake Lewin, President, CCOF Certification Services, LLC

CCOF Comments on Crops Subcommittee's Discussion Document "Aeroponics/Hydroponics/Aquaponics."

I. NOSB should clarify standards for aeroponic, hydroponic, aquaponics, and other container-based systems.

CCOF is eager to discuss standards or guidance for aeroponic, hydroponic, aquaponics, and other container-based systems. Strong, clear standards or guidance will bring greater consistency among certifiers and improve implementation of organic principles. Therefore, NOSB should solicit comments on allowable practices and certification requirements for these evolving systems.

So far, NOSB has not created sufficient opportunity to discuss standards or guidance because it has focused on what to prohibit rather than what to *require*. Rather than recommend sweeping prohibitions of certain types of production practices, NOSB should evaluate what practices set certified operations apart from their conventional counterparts. For example, NOSB should evaluate how certified hydroponic and container-based operations comply with soil health, biodiversity, and nutrient cycling requirements. By focusing on prohibition, NOSB misses the opportunity to bring greater clarity to the certification process.

NOSB should not recommend designating aeroponic, hydroponic, and aquaponics systems, as defined in the discussion document, as excluded methods. The discussion document proposes to prohibit aeroponic, hydroponic, and aquaponics systems by designating them as excluded methods under 7 CFR 205.105. This is not consistent with the GMO-based role of the "excluded methods" concept.

Moreover, the current proposed definitions would result in the exclusion of existing operations or operations with practices that align with organic principles. It is also unclear whether any exceptions would exist that would allow for some types of hydroponic systems. Again, we encourage proactive recommendations for allowable practices and requirements.

II. NOSB should facilitate a robust discussion of labeling options.

CCOF strongly encourages the NOSB to consider whether a labeling option would be appropriate for aeroponic, hydroponic, and aquaponics systems before it moves forward with the proposed direction of this discussion document. Although it is generally not best practice to single out any single type of operation, some organic stakeholders are concerned about misleading consumers who may expect organic crops to be grown in traditional in-ground systems. A label requirement, coupled with strong standards, could resolve this concern by promoting consumer choice without broadly excluding existing and future operations from organic certification.

To start the discussion, CCOF recommends NOSB solicit comments on the options for primary packaging. For example, producers who use aeroponic, hydroponic, and aquaponics systems could be required to add a term such as "hydroponically grown" to primary packaging to accompany the USDA organic seal. Extending a labeling requirement to the limited use of hydroponically grown crops in processed product would be more challenging but might be addressed with a simple disclaimer such as "may be produced with hydroponically grown [crop]."

CCOF would welcome the opportunity to weigh in on labeling options and sees this option as a potential solution to differences of opinions on consumer acceptance of these types of systems.

III. The definition of hydroponic should not include the term “biologically recalcitrant.”

The subcommittee should remove the term “biologically recalcitrant” from the proposed definition of hydroponic. The discussion document describes “biologically recalcitrant” as “organic materials resistant to microbial degradation, but will degrade slowly over time.” The term and its definition are too vague. Biologically recalcitrant materials could include any carbon-based material that has other nutrients such as mulch and straw. Therefore, the definition of hydroponic should not include the term “biologically recalcitrant.”

IV. Important considerations for the future of organic production

NOSB should consider the impacts of excluding existing organic producers and preventing certification of a range of systems. Innovative, complex, and biologically-based hydroponic systems are currently certified to the national organic standards. In regions with severe water shortages or where access to land is scarce, CCOF sees these operations using innovative practices that support ecosystems and promote land stewardship.

Additionally, NOSB should discuss these types of operations in the context of their ability to respond to their site-specific conditions. The discussion document points out arguments for and against hydroponics, but it also compares hydroponic operations to field production. A more useful discussion would be to focus on how certified hydroponic operations respond to *their* site-specific conditions, including climate and natural resource constraints, while promoting organic principles.

Moreover, the reality of crop production and access to organic food will play a role in the growth of the organic sector regardless of whether they are factors strictly considered in certification. The discussion document notes that food safety, worker health, food access, or aiding small scale growers are not factors used to determine compliance with organic principles and regulation. However, consumers of all types, including those living in urban areas where farmland is scarce, are demanding organic food. And as agriculture evolves and young farmers seek certification, they must consider their region’s resource constraints. For these reasons, the organic community must work together to clarify standards for hydroponic systems and recognize the evolving nature of agricultural production today.