

Recirculating Farms Coalition Pubic Comment NOSB Meeting April 20, 2017

Currently, hydroponic and aquaponic farms are certified as USDA Organic and should remain so.

1. These farms, like in-ground or raised-bed growing can meet organic standards;
2. We too feed the “soil”, not the plants by adding amendmets. Soil is about the biology of the system creating nutrients for the plants;
3. The main difference in these verses traditional in-ground or raised-bed farms is the medium holding plant roots – some have dirt, and others, rocks or other media;
4. Hydroponic and aquaponic farms, depending on design, are essentially container growing.

Our Executive Director, Marianne Cufone was on the NOP’s Hydroponic and Aquaponic Task Force. The discussions were contentious during those meetings, and she feels there was a lot of misinformation about how hydroponic and aquaponic farms function. This now could result in the NOSB making a bad recommendation for hydroponic and aquaponic farms that meet organic standards, to lose the USDA Organic label. That would send a terrible message to both farmers and consumers.

USDA regularly says it wants to encourage new farmers and engage more young people in growing. Hydroponics and aquaponics do both. Though these techniques are centuries old – like the Hanging Gardens of Bablylon and Chinampas in Mexico - there are new twists making them exciting and innovative. We should be encouraging farmers to use resource-smart techniques and invest time and money to be USDA Organic, not discourage them by taking away the possibility of certification.

For consumers – seeing products once labeled USDA Organic, but no longer carrying the label, means they were duped, that the farms and products shouldn’t have been USDA Organic. This is a dangerous precedent and risks the entire integrity of the Organic label. These products have not changed, it’s just that politics are shifting and that’s not a good reason to pull USDA Organic certification from deserving products and farms.

The concept of organic is both about known inputs and consistent outputs. And we agree it is also about not harming, and improving our environment.

Years ago this was primarily about soil – meaning earth. But today it should be more. Many hydroponic and aquaponic farms improve our environment – by using less water, less space, running on alternate energy, recycling and reusing waste, and being located right in the communities where food is used, thus cutting down on fossil fuels for shipping and refrigeration. All of this contributes to a healthier planet.

Nowhere in any law or regulation does it explicitly say USDA Organic requires soil. It says that organics should improve or not harm soil. Certainly hydroponic and aquaponic farms easily fit this.

Hydroponics and aquaponics as styles of commercial growing weren't contemplated when the law for organics was created – but that doesn't mean they should be excluded now, based on an outdated rather than inclusive interpretation of the law. We urge you to take time to learn more about these growing methods before excluding them all from USDA Organic certification.

Sadly, this issue feels more about money than protecting an organic ethos. Many consumers associate “the best” of a product with the USDA Organic label. This gives products with the label an edge in the marketplace - higher prices, and notable demand. We have a 39 billion dollar organic food market in the U.S. There should be room for any farms and products that can meet the standards to be USDA Organic.

Lastly – a separate but supposedly equal type label isn't a good approach. There is only one USDA Organic. Labeling products as anything else is a waste of time and resources. USDA Organic is an important label to consumers - and hydroponic and aquaponic farmers want to be a part of that - not some separate, lesser label, as a consolation for losing USDA Organic certification. It is unlikely that hydroponic and aquaponic farms will spend time and money on an alternate certification. And they shouldn't have to do so. Hydroponic and aquaponic farms that can meet USDA Organic standards should remain eligible for USDA Organic certification.

Thank you for your time.