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Testimony of Marianne Cufone October 2017

My name is Marianne Cufone, I am the Executive Director of the Recirculating Farms Coalition, a national nonprofit organization dedicated to sustainable growing to provide healthy fresh food mainly in low income, underserved areas and to create jobs in green businesses, nationwide. I'm an environmental attorney and I was on the NOP Hydro/Aqua ponics Task Force.

It is highly unfortunate how the conversation about hydro/aqua ponic certification has devolved into a name calling, finger pointing, divisive issue. Whether you grow food in the ground, in a raised bed or container, on a trellis, in pebbles, or other medium – we are all farmers. Many of us try to grow food in the best way we know how – for us and our planet. And some of us grow in accord with existing legal organic standards, and for that – if we meet USDA Organic standards – we should get a USDA Organic label. The label isn't owned by any particular group of farmers. While we appreciate those who paved the way for the label, that doesn't make it exclusive. It is a government issued label that should be available to any farm that meets the legally defined standards.

In line with this, I noted that the most common complaint about USDA Organic certification for hydro and aqua ponic farms is that they do not directly enhance the dirt, on the ground. That is not necessarily so for all such farms. But if this is the only meaning of USDA Organic (and I do not believe that it is, based on the letter of the law), then it is equally inappropriate to allow certification of farms that use the container method of growing, unless hydro and aqua ponic farms can also earn certification. The soil in containers does not touch the earth. The container growing option is no compromise. It's a specific exemption to allow dirt farming, in raised beds. That still leaves hydro/aqua ponic growers with nothing. Some say organic is just about using dirt itself. This makes no sense – we have a recommendation from this Board pending with USDA – to allow organic seafood – which has nothing to do with dirt on the earth. Some people may associate the term USDA Organic with soil – but most associate it with the "cleanest" or "best" method of production.

Not all hydro/aqua farms are the same – just like not all in ground or container farms are the same. I am extremely disappointed to hear and read sweeping generalizations about hydro and aqua ponic energy usage, inputs, materials and other matters at this meeting. Much is inaccurate and thus irresponsible, as the Board will be using these documents as the basis to make a decision on whether such farms can be certified USDA Organic. I have seen and heard much other testimony on this, but I'll repeat it today. Our farm in New Orleans, Louisiana grows entirely outdoors, uses only organic and heirloom seeds, runs almost entirely on solar power, relies mainly on rainwater and recirculates all water and waste within the farm. We don't refrigerate or ship our products – so we reduce fuel usage too. We leave the world a better place and feed people. To ignore the potential expansion of such sustainable operations in organic growing is short sighted. Just because the face of some farming is changing – doesn't make it any less organic.

In our world today, we need more responsible farmers, smarter resource use and thoughtful production. It is the Board's job to encourage those, to make sure the USDA Organics program expands and develops in a smart and appropriate manner. Excluding hydro/aqua ponic farms from organics is neither smart nor appropriate. It takes away incentive for new and beginning farmers to be innovative, for existing growers to diversify their systems and to be smart about all resource use, not just the soil. It also prevents expansion of urban farming into organic, where there is little space for in ground growing. The current definition of organic in the law is inclusive. Some very smart people left the door open legally for various types of farms to qualify for USDA Organic certification. Let's not go backwards in organic production, but move wisely forward as leaders, embracing future potential. Others will follow. Do not take away the USDA Organic label from famers who earned it just because they choose to raise food through innovative, hydro or aqua ponics. And let's stop being a hydro farmer, a dirt farmer, a container farmer and just all be farmers who are ALL eligible for the USDA Organic label.