

*Protecting,  
promoting and  
developing the  
organic seed trade*

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2648-So, Ag Stop 0268  
Washington, DC 20250-0268

Docket: **AMS-NOP-15-0085**

Re: USDA Hydroponic and Aquaponic Task Force

Dear NOSB and Ms. Arsenault,

*Organic Seed Growers and Trade Association (OSGATA)* is the farmer-controlled national non-profit membership trade organization of certified organic farmers, certified organic seed companies, organic seed professionals, affiliate organizations and individuals dedicated to the advancement of certified organic seed. *OSGATA* is committed to protecting, promoting and developing the organic seed trade and its growers, thereby assuring that the organic community has access to excellent quality certified organic seed, free of genetic contaminants and adapted to the diverse needs of local organic agriculture.

On behalf of its membership, OSGATA respectfully submits the following comments regarding the allowance of hydroponic production in organic.

**Organic production must be soil-based:** meaning certifiable crops are grown in soil in the ground. The very name "organic" hinges upon the practice of maintaining or improving the "organic," or carbon-containing, content of farm soil through various methods and practices. Furthermore, the OFPA specifically required an organic plan designed to foster soil fertility (§6513b).

On April 29, 2010, following extensive feedback from the organic community, NOSB made a [formal recommendation](#) to NOP stating that hydroponic systems should not be eligible for organic certification. An excerpt from the recommendation is as follows:

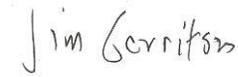
"Observing the framework of organic farming based on its foundation of sound management of soil biology and ecology, it becomes clear that systems of crop production that eliminate soil from the system, such as hydroponics or aeroponics, can not be considered as examples of acceptable organic farming practices. Hydroponics, the production of plants in nutrient rich

solutions or moist inert material, or aeroponics, a variation in which plant roots are suspended in air and continually misted with nutrient solution, have their place in production agriculture, but certainly cannot be classified as certified organic growing methods due to their exclusion of the soil-plant ecology intrinsic to organic farming systems and USDA/NOP regulations governing them."

The current allowance of hydroponics within organic certification is a misappropriation of the label, and lends to confusion in the marketplace.

Hydroponics, and other crop systems which conduct production in soil-less media, must never be considered organic. We urge NOSB to stand by its 2010 recommendation and act to remedy the current disingenuous allowance of hydroponics in organic.

Respectfully submitted on behalf of OSGATA's certified organic members,

A handwritten signature in black ink that reads "Jim Gerritsen". The signature is written in a cursive, slightly slanted style.

Jim Gerritsen, President  
OSGATA