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National Organic Standards Board
USDA-AMS-NOP
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Submitted via www.regulations.gov

RE: Docket: AMS-NOP-16-0049

Hydroponic and Aquaponic Task Force Report and the NOSB Crops Subcommittee Proposal: Hydroponic/Aquaponics/Biaponics

Dear NOSB members:

Thank you for the opportunity to provide comments on the Hydroponic and Aquaponic Task Force Report and the Crops Subcommittee Proposal: Hydroponic/Aquaponics/Biaponics. Currently, MOSA does certify approximately seven aquaponic and hydroponic producers, taking care to ensure that the National Organic Standards, including the soil fertility and crop nutrient management practice standards, are met. In the past year, we also worked with a few hydroponic producers who were unable to meet the requirements. These producers withdrew their application during our review process. The Task Force reports a 33% growth in certified hydroponic/aquaponic producers since 2010. Indeed, MOSA has witnessed an increasing interest in organic certification from both hydroponic and aquaponic producers.

We support the continued expansion of the organic industry into new systems that are sustainable and in line with organic principles. The standards are rooted in improving and maintaining our whole environment. The backbone of organic production is about complex natural interactions and symbiotic relationships. While we're traditionally focused on soil ecology, we recognize that life and all of its diversity exists in a continuum of living conditions, not just those reliant on soil. An organic producer's role is to nurture and steward the complex interactions found in nature, to foster cycling of resources, promote ecological balance, and conserve biodiversity. Soil is a part, but holistic thinking is the heart.

We believe that organic principles hold solutions to many challenges. In this time of climate change, food safety concerns, food deserts, extreme weather and diminishing natural resources, the organic community is being called on to adapt and to be agricultural *innovators*. We recognize that bioponic systems could contribute to the growth of the organic industry while

addressing environmental and food sovereignty concerns. Additionally, the Task Force report reminds us that ancient civilizations practiced hydroponic and aquaponic production techniques using natural materials and inputs. Perhaps we are now experiencing, as we did during the rise of the traditional organic movement, the re-discovery of a valid and valuable agricultural production system that was lost during the historically-recent access to synthetic agricultural inputs.

MOSA supports the balanced perspective of the Hydroponic Task Force Report. As we consider the four production systems; hydroponic, bioptic, aquaponic and aeroponic, as defined in this report, we agree that sterile, inert hydroponic systems do not align with OFPA and the USDA organic regulations. However, we see areas of alignment in bioptic and aquaponic production systems and agree with the Task Force report's arguments regarding how bioptic production complies with 205.202, 205.203 and 205.205. We agree that in order to continue this discussion, a standardized set of definitions must be carefully considered. Establishing regulations is a reasonable and expected path. We think this proposal prematurely arrives at a closed door for innovative organic production opportunities. The organic community continues to be creative and conscious, and to ensure that consumers can count on the organic label. We're confident that organic principles can be upheld in *all areas* where growth is allowed to happen.

Also, as we consider the certification of bioptic production systems, we must consider the work of the Aquaculture Working Group, remembering the potential for certification of aquatic animals. Will we eventually find ourselves in the position of being able to certify the fish but not the plants that are part of the aquaculture system? Would this contradiction erode consumer trust in the organic label?

MOSA supports the motion "to allow bioptics, (including hydroponic, aquaponics and aeroponics) as consistent with organic production under the provisions and recommendations to be developed by the NOSB in 2017." We support the growth of the organic industry, and encourage standards or guidance development in *all areas* where production systems do not entirely align with the current standards.

Thank you for your work on this challenging and precedent-setting issue.

Respectfully submitted,

The MOSA Certification Team