

Field and Greenhouse Container Production

We are an informal group of certification, education, and policy organizations who agree that soil is the foundation of organic agriculture, and who strive to achieve consistency in our organizational policies and certification decisions.

Specifically, we agree upon the following ideas:

- Soil is the foundation of organic agriculture.
- A full reading of the Organic Foods Production Act (OFPA 6513) and the Regulations requires that organic plants be grown in soil. Aeroponic, hydroponic, and crops grown to maturity in containers do not comply with [OFPA 6513(b)(1)].
- We cannot achieve consistency in our policies and decisions until the NOP goes through the formal rulemaking process for Greenhouse Production Standards which were recommended by NOSB nearly 20 years ago, and
- We cannot achieve consistency in our policies and decisions until containers go through the process of NOSB discussion, recommendation, and NOP rulemaking.

Further, we agree that the following crops grown in containers have historically been certified organic, and ought to be allowed to be certified organic moving forward. We have adopted them into certification policies in the absence of clear and applicable standards.

- **Sprouts** (which are mentioned in the rule as requiring organic seed, and which take their nutrition entirely from the seed)
- **Microgreens** (which are not mature at the time of harvest, but are sold as immature plants, and which also derive much of its nutrition from the seed)
- **Fodder** (sprouts for livestock)
- **Transplants**, annual seedlings, and perennial planting stock (which are subsequently transplanted and grow to maturity in soil)
- **Mushrooms** (fungi, not plants, but widely certified with somewhat consistent ad hoc policies developed by certifiers over time, based on the NOSB Final Recommendation on the Mushroom Practice Standard, or using livestock standards, as fungi are other, non-plant life. There are, however, significant differences in terms of what certifiers allow as substrate.)

Based on our interpretation and full reading of OFPA and the NOP regulations, our current consensus is that the above is a complete list of crops that should be allowed to be certified when grown in containers. These items still require NOSB discussion, recommendation, and rulemaking to improve the consistency of existing extrapolation, interpretation, and certification. The 2010 NOSB recommendation on Terrestrial Plants in Containers and Enclosures should be used as a starting point. Admittedly, this “cart before the horse” approach to rulemaking, in which production types are certified before clear standards exist, is backwards and ought to be avoided moving forward.

Finally, we urge the NOSB to activate the latent agenda item “Field and Greenhouse Container Production” which was listed on the NOSB Work Agenda grid from 2017 until Spring 2021 as “On Hold,”

but which recently disappeared from that list. We would happily provide detailed input as to the forward movement of this agenda item with the shared goal of improved transparency and consistency, and bringing us into greater alignment with the global organic movement, including the recent IFOAM position on Hydroponics¹. **Please work to add “Field and Greenhouse Container Production” back to the NOSB work agenda and lead our community in a discussion of this essential topic.**

Sincerely,

MOFGA Certification Services, LLC

Ohio Ecological Food and Farm Association

OneCert, Inc.

Northeast Organic Farming Association- New York

Vermont Organic Farmers

¹ <https://www.ifoam.bio/sites/default/files/2021-06/organicsinaction.pdf>, p.45 – Hydroponic Production not in line with Organic Principles