

## **NOSB Fall Meeting - 2016**

## **Mark Kastel Testimony**

My name is Mark Kastel. I'm the codirector of The Cornucopia Institute and act as our senior farm policy analyst. Our membership consists of approximately 10,000 individuals, including an important percentage of the nation certified organic farmers.

I first want to formally deliver over 1400 individually signed proxies, and again with a high percentage of certified organic farmers, from over 40 states represented.

Yes! Please hand-deliver my signed proxy letter, below, to the members of the National Organic Standards Board.

Dear NOSB members,

Please discontinue certifying all hydroponic and aquaponic operations for the following reasons:

- The organic certification of soil-less operations violates the Organic Food Production Act of 1990 (OFPA),
  which requires maintaining and improving soil fertility as the foundation of organic agriculture. The biological
  diversity and complexity in a soil system cannot be replicated in water to produce the environmental benefits and
  nutrient-dense food organic consumers expect.
- The NOSB's 2010 formal recommendations on the "Production Standard for Terrestrial Plants in Containers
  and Enclosures (Greenhouses)" specifically states that "hydroponics and aeroponic systems are prohibited." The
  NOP's decision to allow organic certification of hydroponic systems is in violation of their legal responsibility to
  follow OFPA (the statute for setting standards).
- 3. OFPA "assure(s) consumers that organically produced products meet a consistent standard." The 2010 NOSB recommendations are consistent with international standards. Twenty-four EU countries, Canada, Mexico, and recommendations from the International Federation of Organic Agriculture Movements (IFOAM) and the Expert Group for Technical Advice on Organic Production (EGTOP) prohibit organic certification of hydroponics and limit container growing to the sale of annual seedlings.
- 4. The "Keep the Soil in Organic" movement has strong support from many farmers who founded the organic movement and organizations representing over 2.2 million organic stakeholders. Organic farmer and Hydroponic Task Force Member, Dave Chapman stated that if the certification of hydroponics is not discontinued, "Between hydroponics and animal welfare, we will have lost organic as a word describing our way of farming."
- Soil bacteria and fungi provide plants with minerals obtained from the mineral fractions of the soil. Carbon, captured from the atmosphere, returns as organic matter to the soil. Healthy soil should be the primary source of fertility for organic crops, not the continuous feeding of liquid nutrients.

I urge you to consider the enormous negative impact on U.S. farmers from imported hydroponic fruits and vegetables flooding U.S. markets, especially given the fact that hydroponic produce cannot legally be labeled organic in the countries of origin. Please consider the harm to organic integrity when standards are inconsistent and the founders of the organic movement disagree with USDA policy makers.

Name:	
Stakeholder Type (farmer, processor, retailer, consumer, etc.):	
Signature:	
Address:	
Email:	

They are all making it very clear that hydroponic and container growing, whether or not the roots are in liquid or a nonnutritive substrate, <u>in a container</u>, is not consistent with the spirit and letter of the organic law.

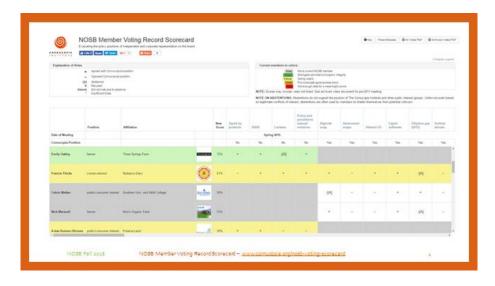
....Why should you listen to these organic stakeholders?



Why should you listen to veteran experts, who will be testifying this week, like Dr. Michael Hansen and Charlotte Vallaeys of Consumers Union, Dr. Terry Shistar of Beyond Pesticides or Dr. Linley Dixon of The Cornucopia Institute?

Please allow me to make this clear, all of these organizations, with long legacies of monitoring organic policymaking are tax-exempt PUBLIC INTEREST GROUPS.

The <u>voting record</u> of this panel indicates, in contested votes, many members <u>universally</u> reject the advice and counsel of these learned public representatives.



A sizable percentage of NOSB members, in contested decisions, vote and stand nearly 100% in consort with the Organic Trade Association and its corporate members.



And what is the OTA? Let me first tell you what it is not ..... It is <u>NOT</u> a public interest group.

It is a <u>trade association</u> mandated to lobby on behalf of businesses in the organic industry. Although they might want to say they represent farmers, they represent the businesses that buy commodities <u>FROM</u> farmers. They might want to say they represent consumers. But they represent the businesses that sell organic products <u>TO</u> consumers.

Who should you be listening to in the organic community?



The FMC Corporation, originally Food Machinery and Chemical Corp, has one reason that they are funding an Astroturf campaign to convince you how necessary carrageenan is in organic foods .... Profit.



Likewise, the reason that multinational companies like Driscoll's (whose vast preponderance of business is conventional), or Wholesum Harvest, have funded a phonybaloney grassroots group, the Coalition for Sustainable Organics .... is profit.



Profit is not a dirty word. But suggesting that labeling organic, growing without soil, is legal or ethical is flatly wrong ... <u>But it does appear to be highly profitable</u>.

Thank you. I would be happy to answer questions on the prohibition in international organic law prohibiting hydroponic <u>and</u> container growing.