



**C O R N U C O P I A**  
**I N S T I T U T E**

**Testimony Presented to the Fall Meeting of the National Organic Standards Board (NOSB)**

*October 25, 2018 – St. Paul, MN*

By Melody Morrell – The Cornucopia Institute, Data Analyst and Research Specialist

I have studied shipping logs, following the importation of “organic” corn and soy from suspect countries. I have seen loads whose consignee, shipper, and notifying party are all listed as FedEx—no transparency. Cheap, often fake, organic feed props up organic factory farm operations and has spread all over the marketplace. Cheap feed means cheaper meat, milk, and eggs.

In reality, these are conventional products sold at depressed organic prices.

Your continued attention to tracking organic products through the supply chain is critical to the integrity of the program and consumer trust. I am pleased to hear of the NOP’s present efforts and hope you can move quickly.

The natural evolution of organic farming is subverted when regulations are bent to fit the conventional model. Rather than leaving room for the improvement of organic practices, we are ushering in a “kinder, gentler conventional agriculture.” Real organic farmers are being forced out of business.

Organic farmers who grow produce in soil now compete with hydroponic factories using organic inputs. Even during tomato season, “organic” hydroponic tomatoes dominate my rural Minnesota grocery store and our local organic buying club. They are cheap, sometimes even reaching conventional tomato prices.

Hydroponic operations require an enormous amount of energy-expensive infrastructure and do nothing to “improve or maintain the soil,” as the Organic Foods Production Act directs. Beginning in 1995, the NOSB studied, discussed, and took public comments on whether soil-less systems could be certified. In 2010, the board determined that “systems of crop production that eliminate soil from the system, such as hydroponics or aeroponics, cannot be considered as examples of acceptable organic farming practices.”

But here we are.

This spring, the European Union revised its organic standards to prohibit hydroponic production under their organic label. The E.U. will no longer import produce labeled “organic” if it was grown hydroponically, beginning in 2021. I made copies of the pertinent parts of that new regulation, if you haven’t seen it yet. It includes a clear definition of organic soil-bound production. What will it mean for the U.S.-E.U. Organic Equivalency Arrangement when our labels do not mean the same thing?

Factory farm and hydroponic products dominate the market because they have been allowed to bear a seal they have not earned. Thank you for your continued and complicated efforts to protect a true marketplace alternative. Thanks especially to Jennifer Tucker for her efforts at improved transparency at the NOP.