

April 25, 2024

Spring NOSB Oral Comments

Good morning members of the NOSB and NOP. My name is Kestrel Burcham. I am the Policy Director for The Cornucopia Institute.

I am going to be blunt: we are being flooded with bad news. Extreme weather patterns have continued into 2024, with scientists worried we have already breached the crucial 1.5 Celsius warming threshold outlined in the Paris climate agreement. Consumer health continues to decline overall, due in part to poor regulation of toxins in our environment. Our food system is fragile and breeds food and nutrition insecurity among those most vulnerable.

I think many in this room would agree that organic food and farming can serve as a balm to many of these problems.

I want policymakers and advocates to dream big and truly invest in establishing organic production as an alternative to harmful conventional practices, rather than a niche product only available to the privileged and ideologues. Organic should be the floor as we move toward a food system that embraces [agroecological principles](#) of diversity, co-creation, resilience, human and social values, and a circular and solidarity economies.

To achieve that vision organic as we know it needs to have high integrity, transparency, and prioritize environmental and human health. These goals require a consistent application of the organic regulations.

Some problems of consistency are being worked on by the Board and the NOP right now, which we are thankful for. But there are always issues to address. Specific concerns include:

1. The evergreen problem of inert ingredients. Allowing synthetic inert ingredients to still be used without being reviewed and listed on the National List flies against fundamental organic principles – especially when we know many of the inert substances are dangerous to human health and environment. All these ingredients must be listed and the NOP should allocate resources as needed.
2. Soil is the foundation of organic agriculture! Allowing hydroponic under the organic label is inconsistent with key requirements in the regulations. The lack of consistency in this area is harming the organic marketplace as a whole, and undermines any promise of a food system aligned with agroecological principles. We ask that the Board call a moratorium on the certification of new hydroponic operations until this issue can be resolved.

The “experiment” that is the conventional food system is an absolute failure, especially from the human and environmental health standpoint. The lack of transparency and disregard of the **precautionary principle** are fundamental to that failure.

Organic consumers trust the label. Many in the disabled community, including myself, *rely* on organic food to maintain functionality in some form. Research continues to back up the environmental and health benefits of organic food despite pressure from anti-organic propaganda. It will take hard work to protect the food and farming practices we support, but that work is needed to keep moving the needle to a more sustainable and safe future for everyone.

In this way I hope that the organic marketplace can be defined by the phrase: “Once you know better, do better.”

Thank you for your time and hard work protecting organic integrity.