



**STOP 0202-Room 3943-S  
1400 Independence Avenue, SW.  
Washington, DC 20250-0202**

January 13, 2017

In reply, please refer to  
2016-AMS-05787-F

Jason Cole  
Research Associate  
The Cornucopia Institute  
P.O. Box 126  
Cornucopia, Wisconsin

Dear Jason Cole:

This is an interim response to the above referenced FOIA request which sought “all correspondence between the National Organic Program and accredited organic certifiers that discusses or describes hydroponics, aquaponics, bioponics, ponics or container growing.”

A search was conducted within the Accreditation and International Activities Division of the National Organic Program, Agricultural Marketing Service. This search resulted in the identification of 98 pages of responsive records. Within this record set, 28 pages were partially redacted pursuant to exemptions (b)(4), (b)(5), and (b)(6).

Exemption (b)(4) of the FOIA protects “trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential” (5 U.S.C. §552(b)(4) (2006), amended by the OPEN Government Act of 2007, Pub. L. No. 100-175, 121 Stat. 2524). This exemption is intended to protect the interests of both the government and submitters of information [See, e.g., Nat’l Parks & Conservation Ass’n v. Morton, 498 F. 2d 765, 767-70 (D.C. Cir. 1974) (concluding that the legislative history of the FOIA “firmly supports an inference that Exemption (b)(4) is intended for the benefit of persons who supply information as well as the agencies which collect it”)]. The information withheld consists of confidential product information.

Exemption (b)(5) of the FOIA protects “inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than in litigation with the agency.” The Agency records that are subject to protection in full or in part under Exemption 5 are pre-decisional and/or deliberative.

As a threshold matter, the responsive records must be inter-agency or intra-agency documents in order to be protected from disclosure under Exemption (b)(5). Further, to come within the scope of Exemption (b)(5), the responsive records must fall within the coverage of a privileged record in litigation. The deliberative process privilege is one of the litigation privileges that may be invoked under Exemption (b)(5) in order to withhold responsive information. This Exemption of the FOIA protects the “decision making processes of government agencies.” NLRB v. Sears Roebuck & Co., 421 U.S. 132, 150 (1975); see also Missouri ex rel. Shorr v. U.S. Army Corps of Eng’rs, 147 F.3d 708, 710 (8th Cir. 1998) (“The purpose of the deliberative process privilege is to allow agencies freely to explore alternative avenues of action and to engage in internal debates without fear of public scrutiny.”) Within this record set, AMS is withholding deliberative communication amongst federal government employees about a policy issue.

Exemption (b)(6) of the FOIA permits the government to withhold information regarding individuals in “personnel and medical files and similar files” when the disclosure of such information “would constitute a clearly unwarranted invasion of personal privacy” and where such privacy interests outweigh any public interest which would be advanced by the disclosure of their contact information. As a threshold matter, Exemption (b)(6) protects not only personnel files and medical files, but “similar” files, which are interpreted by courts to cover personal information pertaining to individuals. Within this record set, AMS is withholding personal email addresses and cell phone numbers.

We will continue to process your request. You can expect to receive our next response no later than February 13, 2017.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gregory Bridges".

Gregory Bridges  
FOIA Officer  
USDA, Agricultural Marketing Service

# CERTIFICATE

**Certificate holder**

**Ellegaard A/S  
Storstromsvej 55  
6715 Esbjerg  
DENMARK**

**Product**

Products made of compostable materials

**Type, Model**

Ellepot Nonwoven

**Testing basis**

DIN EN 13432:2000-12  
ASTM D 6400:2004-01  
Certification scheme products made of compostable materials (2012-04)

**Mark of conformity**



kompostierbar

**Registration No.**

7P0472

**Valid until**

2018-02-28

**Right of use**

With this certificate the holder is granted the licence to use the mark of conformity shown above in conjunction with the specified registration number according to the Regulations governing Use of the Mark and the Trademark Usage Guidelines.

See annex for further information.

# ANNEX

<b>Certificate</b>	7P0472 dated 2015-02-24
<b>Technical Data</b>	uncoloured, unprinted  Dimensions (mm):  max. layer thickness: 100 µm
<b>Testing laboratory/ Inspection body</b>	DIN CERTCO Gesellschaft für Konformitätsbewertung mbH Prüfzentrum Augenschutz Tillystraße 2 90431 Nürnberg GERMANY
<b>Test report(s)</b>	000116-PZA-15 dated 2015-02-23





# ANNEX

**Certificate** 7P0472 dated 2015-02-24

**Composition** 100 % 7P0294 (BioWeb™ PLA products grade CD50142M from Ahlstrom Chirnside Limited)



## Schurkamp, Lynnea - AMS

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**From:** Sarah Costin (b) (6) @gmail.com>  
**Sent:** Thursday, March 05, 2015 12:49 PM  
**To:** Gebault King, ReneeA - AMS  
**Subject:** Attachment for paper  
**Attachments:** 7P0472\_en.pdf

Hi Renee,

I believe I already sent you the MSDS. Here's the other attachment.

Best,  
Sarah

Sarah Costin  
Co-Creator/Owner

A Bee Organic  
40707 Daily Road  
De Luz, CA 92028  
760-731-0155

## Schurkamp, Lynnea - AMS

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**From:** Sarah Costin <sarah@abeeorganic.com>  
**Sent:** Thursday, February 19, 2015 4:06 PM  
**To:** Gebault King, ReneeA - AMS  
**Subject:** Fact sheet on paper being used as container  
**Attachments:** FACT SHEET TECHMEK PAPER-2.PDF

**Follow Up Flag:** Follow up  
**Due By:** Friday, February 20, 2015 1:00 PM  
**Flag Status:** Completed

Hi Renee,

The grower just sent this fact sheet on the paper being used as a container.

Sarah

Sarah Costin  
Co-Creator/Owner



A Bee Organic  
40707 Daily Road  
De Luz, CA 92028  
[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

# TECHMEK PAPER

## Fact sheet

- The paper is exclusively produced from 100% natural fibers
- The paper contains no glue, pesticides/fungicides, oil, petrochemical ect.
- Naturally resistant to fungi
- All raw material is certified according to EN13432
- The paper is degraded without leaving nothing else but carbon dioxide (Co2) and hydro dioxide (H2O)
- Co2 neutral life cycle.
- No contamination by composting
- The paper is biodegradable

## Schurkamp, Lynnea - AMS

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**From:** Mann, Renee - AMS  
**Sent:** Wednesday, February 25, 2015 5:05 PM  
**To:** Courtney, Cheri - AMS  
**Cc:** JonesKing, Stacy - AMS; Brines, Lisa - AMS; Gebault King, ReneeA - AMS  
**Subject:** FW: A Bee Organic: Techmek paper container  
**Attachments:** FACT SHEET TECHMEK PAPER-2.pdf

Hello Cheri –

The biodegradable container question raised by A Bee Organic (ABO) is raising some additional questions. As I mentioned to you this afternoon, it may be best to inform Miles of the issue before we provide a response to ABO. ABO's question is below (and the fact sheet is attached). (b) (5)

Please let me know if you have any questions.

Thank you,

Renee M

Renee Mann

Assistant Director, Accreditation and International Activities Division

USDA National Organic Program

(202) 260-8635

[Join the NOP mailing list.](#)

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**From:** Gebault King, ReneeA - AMS  
**Sent:** Friday, February 20, 2015 2:37 PM  
**To:** Mann, Renee - AMS  
**Subject:** A Bee Organic: Techmek paper container

Renee-

I have a question (see below) from Sarah at A Bee Organic about a container they want to use (to replace OASIS products) in a hydroponic system. They would like written approval from the NOP that this container is compliant (see attached Techmek paper spec sheet), which they are looking at strictly as a container (NOT a biobased mulch per Policy Memo 15-1). The rationale for using this paper container is that it is more environmentally friendly because it is biodegradable, unlike other plastic containers used in the industry. The system in which it is used is a soilless system but will utilize an "OMRI approved growing media" in the paper container.

I would appreciate your input.

Thanks!

Renée GK

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Hi Renee,

I have a question for you regarding a container for grow media:

1. What is "At Issue": Is a container for grow media made from biodegradable PLA paper compliant?

2. Relevant Standard(s): None. At this time assorted containers, including plastics and molded fibers, to hold grow media are routinely used by growers (terrestrial and hydroponic) without being included on the National List.
3. Background: A client is transitioning from OASIS containers to OMRI approved grow media in a container. He is understandably nervous and does not want to encounter an issue with the container that will hold the grow media. The container is made from PLA (polylactic acid), a biodegradable paper. He would like to use this type of container because it is created from renewable resources (corn starch) with less environmental impact than plastic and is fully biodegradable. The client would like written approval of the container from NOP prior to starting tests.
4. Proposed Solution(s): NOP provides a written approval of this specific type of container or an approval of containers in general that includes this type of container.
5. Attachments: none
6. Urgency: Moderately high. There is a limited timeframe for product testing.

Thank you for your assistance with this.

Sarah

Sarah Costin

Co-Creator/Owner



A Bee Organic

40707 Daily Road

De Luz, CA 92028

[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

## Schurkamp, Lynnea - AMS

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**From:** Gebault King, ReneeA - AMS  
**Sent:** Friday, February 20, 2015 1:28 PM  
**To:** Mann, Renee - AMS  
**Subject:** FW: Fact sheet on paper being used as container  
**Attachments:** FACT SHEET TECHMEK PAPER-2.PDF

RM,

I received this yesterday from A Bee. It is the spec sheet for the paper container...

RGK

---

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**Sent:** Thursday, February 19, 2015 4:06 PM  
**To:** Gebault King, ReneeA - AMS  
**Subject:** Fact sheet on paper being used as container

Hi Renee,

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Sarah

Sarah Costin  
Co-Creator/Owner



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Link to the NOP regulations <http://bit.ly/NOPStandard-e>



## Schurkamp, Lynnea - AMS

---

**From:** Baron , Anne - AMS  
**Sent:** Tuesday, March 01, 2016 10:29 AM  
**To:** Courtney, Cheri - AMS; Crail, Lars - AMS; Gebault King, ReneeA - AMS; Lopez, JasonJ - AMS; Lusby, MaryLou - AMS; Mann, Renee - AMS; Yang, RobertH - AMS; Zuck, Penelope - AMS; Adams, Edith - AMS; Caceres, Miguel - AMS; Friesenhahn, Martin - AMS; Gilbert, Corey - AMS; Heckart, Patricia - AMS; Hildreth, David - AMS; Horne, Willy - AMS; Kohles, Alan - AMS; Lopez, Mike - AMS; Matejovsky, Kathryn - AMS; Ross, Steve - AMS; Schoop, Jamie - AMS; Skinner, Rick - AMS; Wilson, Darrell - AMS; Gebel, Kelley - AMS; McEvoy, Miles - AMS; Tucker, Jennifer - AMS; Nelson, Kristen - AMS; Lewis, Paul I - AMS; Holmes, Vella - AMS; Michael, Matthew - AMS; andy@oeffa.org  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear AIA staff, NOP Management Team and QAD auditors,

Please find below the message sent to the certifiers.  
Let us know if you have any questions.

Regards,  
Alvik Joseph

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**From:** Baron , Anne - AMS On Behalf Of AMS - AIAinbox  
**Sent:** Tuesday, March 01, 2016 10:12 AM  
**To:** AMS - AIAinbox <AIAinbox@ams.usda.gov>  
**Cc:** 'admin@abeeorganic.com' <admin@abeeorganic.com>; 'sarah@abeeorganic.com' <sarah@abeeorganic.com>; 'ro@abeeorganic.com' <ro@abeeorganic.com>; 'info@ascorganic.com' <info@ascorganic.com>; 'Kat@ascorganic.com' <Kat@ascorganic.com>; 'mfigueiras@argencert.com.ar' <mfigueiras@argencert.com.ar>; 'americert@gmail.com' <americert@gmail.com>; 'americert@gmail.com' <americert@gmail.com>; 'organic@ausmeat.com.au' <organic@ausmeat.com.au>; 'info@argencert.com.ar' <info@argencert.com.ar>; 'lmontenegro@argencert.com.ar' <lmontenegro@argencert.com.ar>; 'jorge.larranaga@aco.net.au' <jorge.larranaga@aco.net.au>; 'organic@ausqual.com.au' <organic@ausqual.com.au>; 'elise@ausqual.com.au' <elise@ausqual.com.au>; 'dcox@baystateorganic.org' <dcox@baystateorganic.org>; 'michael.baker@aco.net.au' <michael.baker@aco.net.au>; 'michael.baker@aco.net.au' <michael.baker@aco.net.au>; 'roxana.priego@biolatina.com.pe' <roxana.priego@biolatina.com.pe>; 'baystateorganic@earthlink.net' <baystateorganic@earthlink.net>; Koble, Clinton - FSA, Reno, NV <clinton.koble@nv.usda.gov>; 'emel.erkon@bio-inspecta.com' <emel.erkon@bio-inspecta.com>; 'central@biolatina.com' <central@biolatina.com>; 'baystateorganic@earthlink.net' <baystateorganic@earthlink.net>; 'amalia.rueda@bioagricert.org' <amalia.rueda@bioagricert.org>; 'admin@bio-inspecta.ch' <admin@bio-inspecta.ch>; 'central@biolatina.com' <central@biolatina.com>; 'Pat.Kennelly@cdph.ca.gov' <Pat.Kennelly@cdph.ca.gov>; 'info@bioagricert.org' <info@bioagricert.org>; 'julia.winter@bio-inspecta.ch' <julia.winter@bio-inspecta.ch>; 'accreditation@ccof.org' <accreditation@ccof.org>; 'Bolicert@megalink.com' <Bolicert@megalink.com>; 'riccardo.cozzo@bioagricert.org' <riccardo.cozzo@bioagricert.org>; 'calidad@certimexsc.com' <calidad@certimexsc.com>; 'rporto@caae.es' <rporto@caae.es>; 'Bolicert@bolicert.org' <Bolicert@bolicert.org>; 'tom.nizet@certisys.eu' <tom.nizet@certisys.eu>; 'ccof@ccof.org' <ccof@ccof.org>; 'rporto@caae.es' <rporto@caae.es>; 'saltmn@clemson.edu' <saltmn@clemson.edu>; 'ccpb@ccpb.it' <ccpb@ccpb.it>; 'Danny.Lee@cdfa.ca.gov' <Danny.Lee@cdfa.ca.gov>; 'mitchell.yergert@state.co.us' <mitchell.yergert@state.co.us>; 'certimex@certimexsc.com' <certimex@certimexsc.com>; Lewin Jake-FASConatct <jake@ccof.org>; 'jvdschootbrugge@controlunion.com' <jvdschootbrugge@controlunion.com>; 'ceres@ceres-cert.com' <ceres@ceres-cert.com>; 'rsetti@ccpb.it' <rsetti@ccpb.it>; 'vincent.morel@ecocert.com' <vincent.morel@ecocert.com>; 'info@certisys.eu' <info@certisys.eu>; 'direccionejecutiva@certimexsc.com' <direccionejecutiva@certimexsc.com>; 'agroecologiauna@gmail.com'

<agroecologiauna@gmail.com>; 'organic@clemson.edu' <organic@clemson.edu>; 'benzing@ceres-cert.com' <benzing@ceres-cert.com>; 'mefraga@foodsafety.com.ar' <mefraga@foodsafety.com.ar>; 'amy.stafford@state.co.us' <amy.stafford@state.co.us>; 'Nathalie.Boes@certisys.eu' <Nathalie.Boes@certisys.eu>; 'joy.mccracken@georgiacrop.com' <joy.mccracken@georgiacrop.com>; 'organic@controlunion.com' <organic@controlunion.com>; 'organic@clemson.edu' <organic@clemson.edu>; 'cvanhook77@earthlink.net' <cvanhook77@earthlink.net>; 'info.ecocertico@ecocert.com' <info.ecocertico@ecocert.com>; 'amy.stafford@state.co.us' <amy.stafford@state.co.us>; 'goabecky@centurylink.net' <goabecky@centurylink.net>; 'aude.bonnet@ecocert.com' <aude.bonnet@ecocert.com>; 'dszalai@controlunion.com' <dszalai@controlunion.com>; 'camila@ibd.com.br' <camila@ibd.com.br>; 'ep@ecoglobe.am' <ep@ecoglobe.am>; 'Jeffry.EVARD@ecocert.com' <Jeffry.EVARD@ecocert.com>; 'Jason.Laney@agri.idaho.gov' <Jason.Laney@agri.idaho.gov>; 'pdescamps@ecologica.com' <pdescamps@ecologica.com>; 'aude.bonnet@ecocert.com' <aude.bonnet@ecocert.com>; 'Beatrice.Breuer@imo.ch' <Beatrice.Breuer@imo.ch>; 'info@etko.org' <info@etko.org>; 'nd@ecoglobe.am' <nd@ecoglobe.am>; 'Mary.nieland@iowaagriculture.gov' <Mary.nieland@iowaagriculture.gov>; 'foodsafety@foodsafety.com.ar' <foodsafety@foodsafety.com.ar>; 'pdescamps@ecologica.com' <pdescamps@ecologica.com>; 'p.perrone@icea.info' <p.perrone@icea.info>; 'terry.hollifield@georgiacrop.com' <terry.hollifield@georgiacrop.com>; 'ma@etko.org' <ma@etko.org>; 'Kristen.Branscum@ky.gov' <Kristen.Branscum@ky.gov>; 'info@globalculture.us' <info@globalculture.us>; 'calidad@foodsafety.com.ar' <calidad@foodsafety.com.ar>; 'herr@bcs-oeko.de' <herr@bcs-oeko.de>; 'goaorg@centurylink.net' <goaorg@centurylink.net>; 'terry.hollifield@georgiacrop.com' <terry.hollifield@georgiacrop.com>; 'a.moutapam@lacon-institut.org' <a.moutapam@lacon-institut.org>; 'lbd@ibd.com.br' <lbd@ibd.com.br>; 'globalculture@earthlink.net' <globalculture@earthlink.net>; 'monica@letis.org' <monica@letis.org>; 'Johanna.Phillips@agri.idaho.gov' <Johanna.Phillips@agri.idaho.gov>; 'goaorg@centurylink.net' <goaorg@centurylink.net>; 'scarlsen@co.marlin.ca.us' <scarlsen@co.marlin.ca.us>; 'imo@imo.ch' <imo@imo.ch>; 'gwendal@ibd.com.br' <gwendal@ibd.com.br>; 'juanantonio.mendoza@mayacert.com' <juanantonio.mendoza@mayacert.com>; 'info@ics-intl.com' <info@ics-intl.com>; 'Johanna.Phillips@agri.idaho.gov' <Johanna.Phillips@agri.idaho.gov>; 'spwalker@mosaorganic.org' <spwalker@mosaorganic.org>; 'maury.wills@iowaagriculture.gov' <maury.wills@iowaagriculture.gov>; 'soh@imo.ch' <soh@imo.ch>; 'wippl001@umn.edu' <wippl001@umn.edu>; 'nop@icea.info' <nop@icea.info>; 'dawn@ics-intl.com' <dawn@ics-intl.com>; 'knewkirk@mofga.org' <knewkirk@mofga.org>; 'adam.watson@ky.gov' <adam.watson@ky.gov>; 'maury.wills@iowaagriculture.gov' <maury.wills@iowaagriculture.gov>; 'etyanich@mt.gov' <etyanich@mt.gov>; 'info@bcs-oeko.de' <info@bcs-oeko.de>; 'nop@icea.info' <nop@icea.info>; 'CarltonN@co.monterey.ca.us' <CarltonN@co.monterey.ca.us>; 'lacon@lacon-institut.org' <lacon@lacon-institut.org>; 'adam.watson@ky.gov' <adam.watson@ky.gov>; 'kirrilley.becker@nasaa.com.au' <kirrilley.becker@nasaa.com.au>; 'letis@letis.org' <letis@letis.org>; 'fischer@bcs-oeko.de' <fischer@bcs-oeko.de>; 'cfanta@naturesinternational.com' <cfanta@naturesinternational.com>; 'jstiles@marincounty.org' <jstiles@marincounty.org>; 'j.kopp@lacon-institut.org' <j.kopp@lacon-institut.org>; 'jabbott@agri.nv.gov' <jabbott@agri.nv.gov>; 'FGIS OA, Maryland' <Deanna.Baldwin@maryland.gov>; 'internacional@letis.org' <internacional@letis.org>; 'Victoria.Smith@agr.nh.gov' <Victoria.Smith@agr.nh.gov>; 'info@mayacert.com' <info@mayacert.com>; 'jstiles@marincounty.org' <jstiles@marincounty.org>; 'Daniel.wunderlich@ag.state.nj.us' <Daniel.wunderlich@ag.state.nj.us>; 'mosa@mosaorganic.org' <mosa@mosaorganic.org>; 'FGIS OA, Maryland' <Deanna.Baldwin@maryland.gov>; 'SGerk@nmda.nmsu.edu' <SGerk@nmda.nmsu.edu>; 'mncia@mncia.org' <mncia@mncia.org>; 'noe.rivera@mayacert.com' <noe.rivera@mayacert.com>; 'lisaengelbert@nofany.org' <lisaengelbert@nofany.org>; 'certification@mofga.org' <certification@mofga.org>; 'cskolaski@mosaorganic.org' <cskolaski@mosaorganic.org>; 'Bryan.Buchwald@ag.ok.gov' <Bryan.Buchwald@ag.ok.gov>; 'agrorganic@mt.gov' <agrorganic@mt.gov>; 'michelle.menken@mncia.org' <michelle.menken@mncia.org>; 'leng@oda.state.or.us' <leng@oda.state.or.us>; 'agcomm@co.monterey.ca.us' <agcomm@co.monterey.ca.us>; 'yurlina@mofga.org' <yurlina@mofga.org>; 'abrewster@ocia.org' <abrewster@ocia.org>; 'sachin.ayachit@nasaa.com.au' <sachin.ayachit@nasaa.com.au>; 'gwebster@mt.gov' <gwebster@mt.gov>; 'gestiondecabilidad@oia.com.ar' <gestiondecabilidad@oia.com.ar>; 'nfc certification@gmail.com' <nfc certification@gmail.com>; 'Huntinggb@co.monterey.ca.us' <Huntinggb@co.monterey.ca.us>; 'hi.yoshida@omicnet.com' <hi.yoshida@omicnet.com>; 'nics@naturesinternational.com' <nics@naturesinternational.com>; 'sachin.ayachit@nasaa.com.au' <sachin.ayachit@nasaa.com.au>; 'kyla@paorganic.org' <kyla@paorganic.org>; 'Jennifer.Gornnert@agr.nh.gov' <Jennifer.Gornnert@agr.nh.gov>;

'nfccertification@gmail.com' <nfccertification@gmail.com>; 'brian.mansfield@primuslabs.com' <brian.mansfield@primuslabs.com>; 'erich.bremer@ag.state.nj.us' <erich.bremer@ag.state.nj.us>; 'dave@naturesinternational.com' <dave@naturesinternational.com>; 'byron.hamm@pro-cert.org' <byron.hamm@pro-cert.org>; 'organic@nmda.nmsu.edu' <organic@nmda.nmsu.edu>; 'ajeppson@agri.nv.gov' <ajeppson@agri.nv.gov>; 'thughes@nsf.org' <thughes@nsf.org>; 'certifiedorganic@nofany.org' <certifiedorganic@nofany.org>; 'Jennifer.Gornnert@agr.nh.gov' <Jennifer.Gornnert@agr.nh.gov>; 'ram@qcsinfo.org' <ram@qcsinfo.org>; 'organic@oeffa.org' <organic@oeffa.org>; 'erich.bremer@ag.state.nj.us' <erich.bremer@ag.state.nj.us>; 'dkirsanovaphillips@scscertified.com' <dkirsanovaphillips@scscertified.com>; 'jeff.stearns@ag.ok.gov' <jeff.stearns@ag.ok.gov>; 'bbakker@nmda.nmsu.edu' <bbakker@nmda.nmsu.edu>; 'rhougaard@utah.gov' <rhougaard@utah.gov>; 'info@onecert.com' <info@onecert.com>; 'lori@nofany.org' <lori@nofany.org>; 'Laura@nofavt.org' <Laura@nofavt.org>; 'cid-organic@oda.state.or.us' <cid-organic@oda.state.or.us>; 'andy@oeffa.org' <andy@oeffa.org>; 'srice@agr.wa.gov' <srice@agr.wa.gov>; 'organic@tilth.org' <organic@tilth.org>; 'jeff.stearns@ag.ok.gov' <jeff.stearns@ag.ok.gov>; 'john.young@yolocounty.org' <john.young@yolocounty.org>; 'info@occert.com' <info@occert.com>; 'sam@onecert.com' <sam@onecert.com>; 'xiao@ofdc.org.cn' <xiao@ofdc.org.cn>; 'kallen@oda.state.or.us' <kallen@oda.state.or.us>; 'oia@oia.com.ar' <oia@oia.com.ar>; 'connie@tilth.org' <connie@tilth.org>; 'ocd@omicnet.com' <ocd@omicnet.com>; 'susan@occert.com' <susan@occert.com>; 'pco@paorganic.org' <pco@paorganic.org>; 'celder@ocia.org' <celder@ocia.org>; 'PrimusOrganic@primuslabs.com' <PrimusOrganic@primuslabs.com>; 'xiao@ofdc.org.cn' <xiao@ofdc.org.cn>; 'info@pro-cert.org' <info@pro-cert.org>; 'pedroalanda@oia.com.ar' <pedroalanda@oia.com.ar>; 'qai@qai-inc.com' <qai@qai-inc.com>; 'ocd@omicnet.com' <ocd@omicnet.com>; 'qcs@qcsinfo.org' <qcs@qcsinfo.org>; 'leslie@paorganic.org' <leslie@paorganic.org>; 'matt.green@dem.ri.gov' <matt.green@dem.ri.gov>; 'deborah.mansfield@primuslabs.com' <deborah.mansfield@primuslabs.com>; 'organic@scsglobalservice.com' <organic@scsglobalservice.com>; 'Dave.Lockman@pro-cert.org' <Dave.Lockman@pro-cert.org>; 'Sally@Demeter-USA.org' <Sally@Demeter-USA.org>; 'irendon@nsf.org' <irendon@nsf.org>; 'Organic@TexasAgriculture.gov' <Organic@TexasAgriculture.gov>; 'robin@qcsinfo.org' <robin@qcsinfo.org>; 'Toaf007@gmail.com' <Toaf007@gmail.com>; 'matt.green@dem.ri.gov' <matt.green@dem.ri.gov>; 'rlarsen@utah.gov' <rlarsen@utah.gov>; 'bnauman@scsglobalservices.com' <bnauman@scsglobalservices.com>; 'Info@nofavt.org' <Info@nofavt.org>; 'Sally@Demeter-USA.org' <Sally@Demeter-USA.org>; 'organic@agr.wa.gov' <organic@agr.wa.gov>; 'Mary.Holliman@texasagriculture.gov' <Mary.Holliman@texasagriculture.gov>; 'dennis.chambers@yolocounty.org' <dennis.chambers@yolocounty.org>; 'Toaf007@gmail.com' <Toaf007@gmail.com>; 'rlarsen@utah.gov' <rlarsen@utah.gov>; 'Nicole@nofavt.org' <Nicole@nofavt.org>; 'bbook@agr.wa.gov' <bbook@agr.wa.gov>; 'dennis.chambers@yolocounty.org' <dennis.chambers@yolocounty.org>

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

#### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)

- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

## Schurkamp, Lynnea - AMS

---

**From:** Gebault King, ReneeA - AMS  
**Sent:** Thursday, March 05, 2015 8:28 AM  
**To:** McEvoy, Miles - AMS; Courtney, Cheri - AMS; Mann, Renee - AMS; JonesKing, Stacy - AMS  
**Subject:** FW: Paper container- information from the manufacturer

Hello, Everyone-

Below is an e-mail chain that I received from Sarah Costin at A Bee Organic regarding the Techmek paper container (aka Ellepot ECO). I am sharing this in case it is helpful for today's discussion.

NOTE: There were no attachments in this e-mail when I received it, although it does reference them. I am trying to obtain them from Sarah.

Thanks!

*Renée GK*

---

**From:** Sarah Costin [<mailto:sarah@abeeorganic.com>]  
**Sent:** Tuesday, March 03, 2015 4:06 PM  
**To:** Gebault King, ReneeA - AMS  
**Cc:** Ro Elgas  
**Subject:** Paper container- information from the manufacturerHi Renee,

Hi Renee,

I'm forwarding you information that was sent to me from the manufacturer of the paper container, known as Ellepot ECO" in hopes that it will move review forward.

Best,  
Sarah

---

**From:** Bjarne B. Pedersen [<mailto:bbp@ellepot.dk>]  
**Sent:** Tuesday, March 3, 2015 12:46 PM  
**To:** Sarah Costin  
**Cc:** Ro Elgas  
**Subject:** SV: Update

Dear Sarah,

I don't know the schedule for NOP meeting but I have some additional information regarding the use of our product.

(b) (4)



(b) (4)

Please let me know your thoughts on this and don't hesitate to contact me if you have questions.

Kind regards  
Bjarne

---

**Fra:** Sarah Costin [<mailto:sarah@abeeorganic.com>]

**Sendt:** 25. februar 2015 19:30

**Til:** Bjarne B. Pedersen

**Cc:** Ro Elgas

**Emne:** RE: Update

Dear Bjarne,

Thank you very much for this information- it should assist the NOP reviewers in making a fact-based decision. We appreciate your willingness to provide it so quickly. Except for sharing with the NOP reviewers we will treat it as confidential.

Would you like to be informed of the review outcome?

Best regards,  
Sarah and Ro  
Sarah Costin and Ro Elgas  
Co-Creators/Owners



A Bee Organic  
40707 Daily Road  
De Luz, CA 92028  
[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

---

**From:** Bjarne B. Pedersen [<mailto:bbp@ellepot.dk>]  
**Sent:** Wednesday, February 25, 2015 12:46 AM  
**To:** Sarah Costin; Ro Elgas  
**Subject:** SV: Update

Dear Sarah and Ro,

The product is nonwoven made of PLA fibres.

As I understand there are two steps here:

1. The use of this container is similar to the use of a plastic pot and if the grower provide a management program in his Contamination Avoidance Plan this should be within the line of organic regulations.
2. The use of this container above ground and afterwards composting in a commercial facility according to the ASTM D6400 the material will biodegrade 100%.

We have just finalized our accreditation on this product for composting according to DIN EN 13432:2000-12 and ASTM D6400:2004-01

I have attached the certificate to this mail.

If you need any further information please don't hesitate to contact me.

**Venlig hilsen / With regards**

Bjarne B. Pedersen  
B. Eng. Development ID  
Direct no.: +45 7614 7663  
Mobile no.: +45 2232 8101  
[bbp@ellepot.dk](mailto:bbp@ellepot.dk)

---

**Ellegaard as**

Storstrømsvej 55  
DK-6715 Esbjerg N  
Tel.: +45 7614 7676  
Fax: +45 7614 7660  
[www.ellepot.dk](http://www.ellepot.dk)

---

**Fra:** Pierre Sleiman [<mailto:Pierre@GoGreenAgriculture.com>]  
**Sendt:** 25. februar 2015 05:38  
**Til:** Sarah Costin; Ro Elgas  
**Cc:** Bjarne B. Pedersen  
**Emne:** Fwd: Update

Hi Bjarne,

Thank you for offering your assistance.

Sarah and Ro,

Please find below Bjarne's contact info. Bjarne can furnish you more specific data on the paper that we are looking to have approved for organic production by the NOP. Due to confidentiality reasons, it is most efficient if Bjarne communicates with you directly to provide all relevant data regarding the paper to make our case to the NOP/NOSB.

Again, I just want to restate our proposed use of the paper to be used: as an above ground pot to hold a mix of OMRI approved materials such as peat, perlite, compost and microbiology.

I don't want to offer more detail than necessary that will result in unnecessary confusion/scrutiny, but I think if Bjarne sends you everything he has, you can submit the relevant information at your discretion.

Please advise.

**Venlig hilsen / With regards**

Bjarne B. Pedersen  
B. Eng. Development ID  
Direct no.: +45 7614 7663  
Mobile no.: +45 2232 8101  
[bbp@ellepot.dk](mailto:bbp@ellepot.dk)

Kind Regards,

**Pierre** Sleiman Jr



C (b) (6)  
O 760.634.2506  
495 Saxony Rd  
Encinitas, CA 92024  
[www.GoGreenAgriculture.com](http://www.GoGreenAgriculture.com)  
Named "Champion of Change" in "The Future of Agriculture" by President Obama

Begin forwarded message:

**From:** "Bjarne B. Pedersen" <[bbp@ellepot.dk](mailto:bbp@ellepot.dk)>  
**To:** Lars Jensen <[LPJ@blackmoreco.com](mailto:LPJ@blackmoreco.com)>, Pierre Sleiman <[Pierre@GoGreenAgriculture.com](mailto:Pierre@GoGreenAgriculture.com)>  
**Subject:** **SV: Update**  
**Date:** February 24, 2015 at 4:55:27 AM PST

Dear Pierre,

Just to confirm mail from Lars, please have your certifying agent contact me for any specific product details or questions regarding the PLA paper.



Also if you like you could send me your description of the product you have applied for, just to make me fully understand it all.

**Venlig hilsen / With regards**

Bjarne B. Pedersen  
B. Eng. Development ID  
Direct no.: +45 7614 7663  
Mobile no.: (b) (6)  
[bbp@ellepot.dk](mailto:bbp@ellepot.dk)

---

**Ellegaard as**

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DK-6715 Esbjerg N  
Tel.: +45 7614 7676  
Fax: +45 7614 7660  
[www.ellepot.dk](http://www.ellepot.dk)

---

**Fra:** Lars Jensen [<mailto:LPJ@blackmoreco.com>]

**Sendt:** 24. februar 2015 01:20

**Til:** Pierre Sleiman

**Cc:** Bjarne B. Pedersen

**Emne:** Re: Update

Hi Pierre

I spoke with Bjarne and they are ready to provide any needed info.

The best, easiest and quickest way would be for your certifier to email Bjarne directly.

He understands the importance of this and I've also stressed out to him that what you have applied for is a bottomless pot made of pla.

I hope it works out - thanks for working with us on it.

Best regards

Lars Jensen

Den Feb 20, 2015 kl. 10:56 PM skrev Pierre Sleiman <[Pierre@GoGreenAgriculture.com](mailto:Pierre@GoGreenAgriculture.com)>:

Perfect. Thank you. I will make the case that the paper will be used to make above ground pots. If you can help me make the case that they are made from natural substances and are biodegradable, that will help a lot.

Best,

**Pierre** Sleiman Jr

C (b) (6)

O 760.634.2506

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Encinitas, CA 92024

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Named "Champion of Change" in "The Future of Agriculture" by President Obama

On Feb 20, 2015, at 7:50 PM, Lars Jensen <[LPJ@blackmoreco.com](mailto:LPJ@blackmoreco.com)> wrote:

Hi Pierre

I will get the guys in Denmark involved ASAP and see if we can't get more specific info.

Best regards

Lars Jensen

Den Feb 20, 2015 kl. 10:28 PM skrev Pierre Sleiman

<[Pierre@GoGreenAgriculture.com](mailto:Pierre@GoGreenAgriculture.com)>:

Hi Lars,

I just wanted to update you. The NOP has an advisory board called the "National Organic Standards Board" aka NOSB that makes recommendations to the NOP as to how to take a stance on materials and processes.

Well, our certifier was notified that the evaluation for the paper has been forwarded to the NOSB for review. This is as official as it gets. My only concern is that they have enough information and that they look at this within the context of the application that we are asking to use it.

I'm going to try to step in to make sure that they have the full and correct set of facts. If there is any further information about the paper, please share. Typically, you only get one shot - an appeal is much more difficult to turn over an original decision. Time is of the essence.

Best Regards,

**Pierre** Sleiman Jr

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O 760.634.2506

495 Saxony Rd

Encinitas, CA 92024

[www.GoGreenAgriculture.com](http://www.GoGreenAgriculture.com)

Named "Champion of Change" in "The Future of Agriculture" by President Obama



## Schurkamp, Lynnea - AMS

---

**From:** Gebault King, ReneeA - AMS  
**Sent:** Thursday, February 19, 2015 1:01 PM  
**To:** Mann, Renee - AMS  
**Subject:** FW: Question about a container

Hi RM,

Sorry to bother you with this question, but I may need some back-up. Sarah wants written confirmation from the NOP that containers made from polylactic acid (PLA) used in hydroponics (substitute for the OASIS products) are an acceptable substitute.

Given the issue with the OASIS products, I understand their concerns. However, the product/material review, at least at this point, should still be under A Bee's purview, correct?

I would appreciate your assistance here. Thanks!!

RGK

---

**From:** Sarah Costin [mailto:sarah@abeeorganic.com]  
**Sent:** Thursday, February 19, 2015 12:42 PM  
**To:** Gebault King, ReneeA - AMS  
**Cc:** Ro Elgas  
**Subject:** RE: Question about a container

Hi Renee,

When you say "some time", approximately how much time? This grower needs to get tests started ASAP to comply with the NOP timing on OASIS. I know you are busy- is there someone to whom you could pass this if you can't respond before you leave?

Sincerely,  
Sarah  
Sarah Costin  
Co-Creator/Owner



A Bee Organic  
40707 Daily Road  
De Luz, CA 92028  
[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

---

**From:** Gebault King, ReneeA - AMS [mailto:ReneeA.GebaultKing@ams.usda.gov]  
**Sent:** Thursday, February 19, 2015 5:14 AM

**To:** Sarah Costin

**Subject:** RE: Question about a container

Hello Sarah,

It was very nice to meet you and Ro in person in Little Rock. I hope you are feeling better! ☺

I received your question and am preparing a response for you. Please note that I am headed out of the country in two days so it will take me some time.

Kind regards,

*Renée*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312

Mobile: 202.770.8672

[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

USDA National Organic Program  
1400 Independence Ave SW  
Room 2649-South, Stop 0268  
Washington, D.C. 20250-0268  
Main Tel: 202.720.3252  
Fax: 202.205.7808  
[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

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---

**From:** Sarah Costin [<mailto:sarah@abeeorganic.com>]

**Sent:** Friday, February 13, 2015 6:04 PM

**To:** Gebault King, ReneeA - AMS

**Cc:** Ro Elgas

**Subject:** Question about a container

Hi Renee,

It was nice to meet you in Little Rock. I was operating at about 50%- sorry to not be more communicative, and I hope I didn't pass on my cold! It seemed that ¼ of the room was sick...

I have a question for you regarding a container for grow media:

1. What is "At Issue": Is a container for grow media made from biodegradable PLA paper compliant?
2. Relevant Standard(s): None. At this time assorted containers, including plastics and molded fibers, to hold grow media are routinely used by growers (terrestrial and hydroponic) without being included on the National List.

3. Background: A client is transitioning from OASIS containers to OMRI approved grow media in a container. He is understandably nervous and does not want to encounter an issue with the container that will hold the grow media. The container is made from PLA (polylactic acid), a biodegradable paper. He would like to use this type of container because it is created from renewable resources (corn starch) with less environmental impact than plastic and is fully biodegradable. The client would like written approval of the container from NOP prior to starting tests.

4. Proposed Solution(s): NOP provides a written approval of this specific type of container or an approval of containers in general that includes this type of container.

5. Attachments: none

6. Urgency: Moderately high. There is a limited timeframe for product testing.

Thank you for your assistance with this.

Sarah  
Sarah Costin  
Co-Creator/Owner



A Bee Organic  
40707 Daily Road  
De Luz, CA 92028  
[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

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## Schurkamp, Lynnea - AMS

---

**From:** Gebault King, ReneeA - AMS  
**Sent:** Tuesday, March 17, 2015 8:30 AM  
**To:** Courtney, Cheri - AMS  
**Subject:** FW: TechMek container

Cheri,

I just received this e-mail from Sarah at A Bee Organic. It seems they were asking for two materials to be reviewed for hydroponic containers (TechMek and Ellegaard), not just one. I would like to discuss my response to them with you if you have time today.

Thank you!

*Renée GK*

---

**From:** Sarah Costin [mailto:sarah@abeeorganic.com]  
**Sent:** Monday, March 16, 2015 5:29 PM  
**To:** Gebault King, ReneeA - AMS  
**Cc:** Ro Elgas  
**Subject:** RE: TechMek container

Dear Renee,

The client pointed out to me that information on 2 different brand names of paper were submitted, TechMek and Ellegaard. Would you please confirm that the Ellegaard paper container will also be allowed.

Thank you,  
Sarah

Sarah Costin  
Co-Creator/Owner



A Bee Organic  
40707 Daily Road  
De Luz, CA 92028  
[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

---

**From:** Gebault King, ReneeA - AMS [mailto:ReneeA.GebaultKing@ams.usda.gov]  
**Sent:** Tuesday, March 10, 2015 6:00 AM

**To:** Sarah Costin; Ro Elgas  
**Cc:** Courtney, Cheri - AMS; Mann, Renee - AMS  
**Subject:** TechMek container

Dear Sarah and Ro,

Thank you for contacting the USDA National Organic Program (NOP) for clarification regarding the TechMek container with regard to hydroponic production.

The USDA NOP has reviewed the information submitted on this product. The USDA NOP confirms A Bee Organic's analysis that the TechMek container is allowed for the specific client operation referenced with this inquiry. This USDA NOP decision does not confer approval of the TechMek container in all situations.

As a reminder, accredited certifiers have the ability to approve materials per client inquiries per [Policy Memo 11-4](#).

Please contact me if you have additional questions or concerns.

Kind regards,

*Renee*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312  
Mobile: 202.770.8672  
[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

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[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

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## Schurkamp, Lynnea - AMS

---

**From:** Sarah Costin <sarah@abeeorganic.com>  
**Sent:** Tuesday, March 03, 2015 4:06 PM  
**To:** Gebault King, ReneeA - AMS  
**Cc:** Ro Elgas  
**Subject:** Paper container- information from the manufacturerHi Renee,

**Follow Up Flag:** Follow up  
**Due By:** Wednesday, March 04, 2015 2:30 PM  
**Flag Status:** Completed

Hi Renee,

I'm forwarding you information that was sent to me from the manufacturer of the paper container, known as Ellepot ECO" in hopes that it will move review forward.

Best,  
Sarah

---

**From:** Bjarne B. Pedersen [mailto:bbp@ellepot.dk]  
**Sent:** Tuesday, March 3, 2015 12:46 PM  
**To:** Sarah Costin  
**Cc:** Ro Elgas  
**Subject:** SV: Update

Dear Sarah,

I don't know the schedule for NOP meeting but I have some additional information regarding the use of our product.

(b) (4)



(b) (4)

Please let me know your thoughts on this and don't hesitate to contact me if you have questions.

Kind regards  
Bjarne

---

**Fra:** Sarah Costin [<mailto:sarah@abeeorganic.com>]  
**Sendt:** 25. februar 2015 19:30  
**Til:** Bjarne B. Pedersen  
**Cc:** Ro Elgas  
**Emne:** RE: Update

Dear Bjarne,

Thank you very much for this information- it should assist the NOP reviewers in making a fact-based decision. We appreciate your willingness to provide it so quickly. Except for sharing with the NOP reviewers we will treat it as confidential.

Would you like to be informed of the review outcome?

Best regards,  
Sarah and Ro  
Sarah Costin and Ro Elgas  
Co-Creators/Owners



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Link to the NOP regulations <http://bit.ly/NOPStandard-e>

---

**From:** Bjarne B. Pedersen [<mailto:bbp@ellepot.dk>]  
**Sent:** Wednesday, February 25, 2015 12:46 AM  
**To:** Sarah Costin; Ro Elgas  
**Subject:** SV: Update

Dear Sarah and Ro,

The product is nonwoven made of PLA fibres.

As I understand there are two steps here:

1. The use of this container is similar to the use of a plastic pot and if the grower provide a management program in his Contamination Avoidance Plan this should be within the line of organic regulations.
2. The use of this container above ground and afterwards composting in a commercial facility according to the ASTM D6400 the material will biodegrade 100%.

We have just finalized our accreditation on this product for composting according to DIN EN 13432:2000-12 and ASTM D6400:2004-01

I have attached the certificate to this mail.

If you need any further information please don't hesitate to contact me.

**Venlig hilsen / With regards**

Bjarne B. Pedersen

B. Eng. Development ID

Direct no.: +45 7614 7663

Mobile no.: (b) (6)

[bbp@ellepot.dk](mailto:bbp@ellepot.dk)

---

**Ellegaard as**

Storstrømsvej 55

DK-6715 Esbjerg N

Tel.: +45 7614 7676

Fax: +45 7614 7660

[www.ellepot.dk](http://www.ellepot.dk)

---

**Fra:** Pierre Sleiman [<mailto:Pierre@GoGreenAgriculture.com>]

**Sendt:** 25. februar 2015 05:38

**Til:** Sarah Costin; Ro Elgas

**Cc:** Bjarne B. Pedersen

**Emne:** Fwd: Update

Hi Bjarne,

Thank you for offering your assistance.

Sarah and Ro,

Please find below Bjarne's contact info. Bjarne can furnish you more specific data on the paper that we are looking to have approved for organic production by the NOP. Due to confidentiality reasons, it is most efficient if Bjarne communicates with you directly to provide all relevant data regarding the paper to make our case to the NOP/NOSB.

Again, I just want to restate our proposed use of the paper to be used: as an above ground pot to hold a mix of OMRI approved materials such as peat, perlite, compost and microbiology.

I don't want to offer more detail than necessary that will result in unnecessary confusion/scrutiny, but I think if Bjarne sends you everything he has, you can submit the relevant information at your discretion.

Please advise.

**Venlig hilsen / With regards**

Bjarne B. Pedersen

B. Eng. Development ID

Direct no.: +45 7614 7663

Mobile no.: (b) (6)

[bbp@ellepot.dk](mailto:bbp@ellepot.dk)

Kind Regards,

**Pierre Sleiman Jr**



C (b) (6)

O 760.634.2506

495 Saxony Rd

Encinitas, CA 92024

[www.GoGreenAgriculture.com](http://www.GoGreenAgriculture.com)

Named "Champion of Change" in "The Future of Agriculture" by President Obama

Begin forwarded message:

**From:** "Bjarne B. Pedersen" <[bbp@ellepot.dk](mailto:bbp@ellepot.dk)>

**To:** Lars Jensen <[LPJ@blackmoreco.com](mailto:LPJ@blackmoreco.com)>, Pierre Sleiman <[Pierre@GoGreenAgriculture.com](mailto:Pierre@GoGreenAgriculture.com)>

**Subject: SV: Update**

**Date:** February 24, 2015 at 4:55:27 AM PST

Dear Pierre,

Just to confirm mail from Lars, please have your certifying agent contact me for any specific product details or questions regarding the PLA paper.

Also if you like you could send me your description of the product you have applied for, just to make me fully understand it all.

**Venlig hilsen / With regards**

Bjarne B. Pedersen

B. Eng. Development ID  
Direct no.: +45 7614 7663  
Mobile no.: (b) (6)  
[bbp@ellepot.dk](mailto:bbp@ellepot.dk)

---

**Ellegaard as**  
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DK-6715 Esbjerg N  
Tel.: +45 7614 7676  
Fax: +45 7614 7660  
[www.ellepot.dk](http://www.ellepot.dk)

---

**Fra:** Lars Jensen [<mailto:LPJ@blackmoreco.com>]  
**Sendt:** 24. februar 2015 01:20  
**Til:** Pierre Sleiman  
**Cc:** Bjarne B. Pedersen  
**Emne:** Re: Update

Hi Pierre

I spoke with Bjarne and they are ready to provide any needed info.

The best, easiest and quickest way would be for your certifier to email Bjarne directly.

He understands the importance of this and I've also stressed out to him that what you have applied for is a bottomless pot made of pla.

I hope it works out - thanks for working with us on it.

Best regards  
Lars Jensen

Den Feb 20, 2015 kl. 10:56 PM skrev Pierre Sleiman <[Pierre@GoGreenAgriculture.com](mailto:Pierre@GoGreenAgriculture.com)>:

Perfect. Thank you. I will make the case that the paper will be used to make above ground pots. If you can help me make the case that they are made from natural substances and are biodegradable, that will help a lot.

Best,

**Pierre Sleiman Jr**

C (b) (6)  
O 760.634.2506  
495 Saxony Rd

Encinitas, CA 92024

[www.GoGreenAgriculture.com](http://www.GoGreenAgriculture.com)

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On Feb 20, 2015, at 7:50 PM, Lars Jensen <[LPJ@blackmoreco.com](mailto:LPJ@blackmoreco.com)> wrote:

Hi Pierre

I will get the guys in Denmark involved ASAP and see if we can't get more specific info.

Best regards

Lars Jensen

Den Feb 20, 2015 kl. 10:28 PM skrev Pierre Sleiman

<[Pierre@GoGreenAgriculture.com](mailto:Pierre@GoGreenAgriculture.com)>:

Hi Lars,

I just wanted to update you. The NOP has an advisory board called the "National Organic Standards Board" aka NOSB that makes recommendations to the NOP as to how to take a stance on materials and processes.

Well, our certifier was notified that the evaluation for the paper has been forwarded to the NOSB for review. This is as official as it gets. My only concern is that they have enough information and that they look at this within the context of the application that we are asking to use it.

I'm going to try to step in to make sure that they have the full and correct set of facts. If there is any further information about the paper, please share. Typically, you only get one shot - an appeal is much more difficult to turn over an original decision. Time is of the essence.

Best Regards,

**Pierre Sleiman Jr**

C (b) (6)

O 760.634.2506

495 Saxony Rd

Encinitas, CA 92024

[www.GoGreenAgriculture.com](http://www.GoGreenAgriculture.com)

Named "Champion of Change" in "The Future of Agriculture" by President Obama



## Schurkamp, Lynnea - AMS

---

**From:** Sarah Costin <sarah@abeeorganic.com>  
**Sent:** Friday, February 13, 2015 6:04 PM  
**To:** Gebault King, ReneeA - AMS  
**Cc:** Ro Elgas  
**Subject:** Question about a container

**Follow Up Flag:** Follow up  
**Due By:** Tuesday, February 17, 2015 1:00 PM  
**Flag Status:** Completed

Hi Renee,

It was nice to meet you in Little Rock. I was operating at about 50%- sorry to not be more communicative, and I hope I didn't pass on my cold! It seemed that ¼ of the room was sick...

I have a question for you regarding a container for grow media:

1. What is "At Issue": Is a container for grow media made from biodegradable PLA paper compliant?
2. Relevant Standard(s): None. At this time assorted containers, including plastics and molded fibers, to hold grow media are routinely used by growers (terrestrial and hydroponic) without being included on the National List.
3. Background: A client is transitioning from OASIS containers to OMRI approved grow media in a container. He is understandably nervous and does not want to encounter an issue with the container that will hold the grow media. The container is made from PLA (polylactic acid), a biodegradable paper. He would like to use this type of container because it is created from renewable resources (corn starch) with less environmental impact than plastic and is fully biodegradable. The client would like written approval of the container from NOP prior to starting tests.
4. Proposed Solution(s): NOP provides a written approval of this specific type of container or an approval of containers in general that includes this type of container.
5. Attachments: none
6. Urgency: Moderately high. There is a limited timeframe for product testing.

Thank you for your assistance with this.

Sarah  
Sarah Costin  
Co-Creator/Owner



A Bee Organic  
40707 Daily Road  
De Luz, CA 92028  
[760-731-0155](tel:760-731-0155)



Link to the NOP regulations <http://bit.ly/NOPStandard-e>

## Schurkamp, Lynnea - AMS

---

**From:** Alexandra "Gamai" Gregory <gggregory@ccof.org>  
**Sent:** Friday, January 08, 2016 5:27 PM  
**To:** Yang, RobertH - AMS  
**Subject:** RE: Clarification: Hydroponic in US/Canada Equivalence

Hello Robert,

Apologies for the late response, I've been out of the office. We have the following policy when evaluating products for export to Canada:

Crops grown in allowed media/substrate are not considered hydroponic if all of the following criteria are met:

1. Biological activity within the growing media/substrate
2. Organic matter present in the growing media/substrate
3. Nutrition available from the growing media/substrate

Best,

**Alexandra "Gamai" Gregory**  
Senior International & Programs Specialist  
CCOF Certification Services, LLC  
2155 Delaware Ave., Suite 150  
Santa Cruz, CA 95060  
(831) 423-2263, ext. 6234  
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---

**From:** Yang, RobertH - AMS [mailto:RobertH.Yang@ams.usda.gov]  
**Sent:** Thursday, January 07, 2016 10:47 AM  
**To:** Alexandra "Gamai" Gregory <gggregory@ccof.org>  
**Subject:** FW: Clarification: Hydroponic in US/Canada Equivalence

Hello Gamai:

Just following up with you regarding my request.

Thanks.

**Robert Yang**  
Accreditation Manager  
USDA National Organic Program  
Office: (202) 690-4540

---

**From:** Yang, RobertH - AMS  
**Sent:** Monday, December 28, 2015 10:54 AM  
**To:** 'Alexandra "Gamai" Gregory' <[gggregory@ccof.org](mailto:gggregory@ccof.org)>  
**Subject:** RE: Clarification: Hydroponic in US/Canada Equivalence

Gamai,

I have one follow-up question ... You mentioned in your email that CCOF currently uses the Canadian definition of "Hydroponic" and its own criteria for non-hydroponic container grown crops.

Could you provide me with CCOF's requirements for non-hydroponic container grown crop production?

Thanks.

Regards,

**Robert Yang**

Accreditation Manager  
USDA National Organic Program  
Office: (202) 690-4540

---

**From:** Alexandra "Gamai" Gregory [<mailto:ggregory@ccof.org>]  
**Sent:** Friday, December 18, 2015 4:19 PM  
**To:** Yang, RobertH - AMS <[RobertH.Yang@ams.usda.gov](mailto:RobertH.Yang@ams.usda.gov)>  
**Subject:** RE: Clarification: Hydroponic in US/Canada Equivalence

Thank you very much Robert.

Happy Holidays!

**Alexandra "Gamai" Gregory**  
Senior International & Programs Specialist  
CCOF Certification Services, LLC  
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Santa Cruz, CA 95060  
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---

**From:** Yang, RobertH - AMS [<mailto:RobertH.Yang@ams.usda.gov>]  
**Sent:** Friday, December 18, 2015 12:48 PM  
**To:** Alexandra "Gamai" Gregory <[ggregory@ccof.org](mailto:ggregory@ccof.org)>  
**Cc:** Jake Lewin <[Jake@ccof.org](mailto:Jake@ccof.org)>; Amy Lamendella <[amy@ccof.org](mailto:amy@ccof.org)>  
**Subject:** RE: Clarification: Hydroponic in US/Canada Equivalence

Hello Gamai:

Thanks for bringing this to my attention.

The NOP is currently reviewing the changes to the COR standards. Your question has been forwarded to the review team. I'll let you know once I have a response for you.

Feel free to check back with me at any time to get an update on the status of the review.

Regards,

**Robert Yang**

Accreditation Manager  
USDA National Organic Program  
Office: (202) 690-4540

---

**From:** Alexandra "Gamai" Gregory [<mailto:ggregory@ccof.org>]  
**Sent:** Thursday, December 10, 2015 4:24 PM  
**To:** Yang, RobertH - AMS <[RobertH.Yang@ams.usda.gov](mailto:RobertH.Yang@ams.usda.gov)>  
**Cc:** Lewin Jake-FASConatct <[jake@ccof.org](mailto:jake@ccof.org)>; Amy Lamendella <[amy@ccof.org](mailto:amy@ccof.org)>  
**Subject:** Clarification: Hydroponic in US/Canada Equivalence

Hello Robert,

With the recent Canadian Organic Regime (COR) standards change, we are not sure how to best honor the Canadian equivalence critical variance of prohibiting hydroponic products for export to Canada.

The COR standard has become more prescriptive as to what is classified as non-hydroponic container grown (see excerpt below), and we are not sure if we should now use these conditions to classify hydroponic product. We currently use the Canadian definition of hydroponic ("cultivation of plants in aqueous nutrient solutions without the aid of soil") and our own criteria for non-hydroponic container grown crops.

**Excerpt from CAN/CGSB-32.310-2015**

*7.5.5 The following conditions apply to containerized, staked crops (for example, tomatoes, sweet peppers, cucumbers, eggplant):*

- a) at the start of production, the total volume of soil shall consist of at least 10% compost;*
- b) compost shall be included in the fertility program;*
- c) containers shall be at least 30 cm (12 in.) high; and*
- d) the soil volume shall be at least 70 L/m<sup>2</sup> (15.4 gal./10.8 ft<sup>2</sup>), based on the total growing area*

Thank you in advance for your response,

**Alexandra "Gamai" Gregory**

Senior International & Programs Specialist  
CCOF Certification Services, LLC  
2155 Delaware Ave., Suite 150  
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## Schurkamp, Lynnea - AMS

---

**From:** Yang, RobertH - AMS  
**Sent:** Friday, January 29, 2016 10:27 AM  
**To:** Alexandra "Gamai" Gregory  
**Subject:** RE: Clarification: Hydroponic in US/Canada Equivalence

Hello Gamai:

Thanks for checking back with me. It looks like the review of the revised COR regulations against the USDA organic regulations is still in-process. Unfortunately, that's the only update I have for you at this time.

Regards,

**Robert Yang**  
Accreditation Manager  
USDA National Organic Program  
Office: (202) 690-4540

---

**From:** Alexandra "Gamai" Gregory [mailto:ggregory@ccof.org]  
**Sent:** Tuesday, January 26, 2016 7:24 PM  
**To:** Yang, RobertH - AMS  
**Subject:** RE: Clarification: Hydroponic in US/Canada Equivalence

Hello Robert,

Has there been any clarification regarding verifying NOP product for export to Canada in accordance with the new COR regulations and the Equivalence arrangement?

Thank you

**Alexandra "Gamai" Gregory**  
Senior International & Programs Specialist  
CCOF Certification Services, LLC  
2155 Delaware Ave., Suite 150  
Santa Cruz, CA 95060  
(831) 423-2263, ext. 6234  
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---

**From:** Alexandra "Gamai" Gregory  
**Sent:** Friday, January 08, 2016 2:27 PM  
**To:** 'Yang, RobertH - AMS' <[RobertH.Yang@ams.usda.gov](mailto:RobertH.Yang@ams.usda.gov)>  
**Subject:** RE: Clarification: Hydroponic in US/Canada Equivalence

Hello Robert,

Apologies for the late response, I've been out of the office. We have the following policy when evaluating products for export to Canada:

Crops grown in allowed media/substrate are not considered hydroponic if all of the following criteria are met:

1. Biological activity within the growing media/substrate
2. Organic matter present in the growing media/substrate
3. Nutrition available from the growing media/substrate

Best,

**Alexandra "Gamai" Gregory**

Senior International & Programs Specialist

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---

**From:** Yang, RobertH - AMS [<mailto:RobertH.Yang@ams.usda.gov>]

**Sent:** Thursday, January 07, 2016 10:47 AM

**To:** Alexandra "Gamai" Gregory <[ggregory@ccof.org](mailto:ggregory@ccof.org)>

**Subject:** FW: Clarification: Hydroponic in US/Canada Equivalence

Hello Gamai:

Just following up with you regarding my request.

Thanks.

**Robert Yang**

Accreditation Manager

USDA National Organic Program

Office: (202) 690-4540

---

**From:** Yang, RobertH - AMS

**Sent:** Monday, December 28, 2015 10:54 AM

**To:** 'Alexandra "Gamai" Gregory' <[ggregory@ccof.org](mailto:ggregory@ccof.org)>

**Subject:** RE: Clarification: Hydroponic in US/Canada Equivalence

Gamai,

I have one follow-up question ... You mentioned in your email that CCOF currently uses the Canadian definition of "Hydroponic" and its own criteria for non-hydroponic container grown crops.

Could you provide me with CCOF's requirements for non-hydroponic container grown crop production?

Thanks.

Regards,

**Robert Yang**

Accreditation Manager  
USDA National Organic Program  
Office: (202) 690-4540

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**From:** Alexandra "Gamai" Gregory [<mailto:ggregory@ccof.org>]  
**Sent:** Friday, December 18, 2015 4:19 PM  
**To:** Yang, RobertH - AMS <[RobertH.Yang@ams.usda.gov](mailto:RobertH.Yang@ams.usda.gov)>  
**Subject:** RE: Clarification: Hydroponic in US/Canada Equivalence

Thank you very much Robert.

Happy Holidays!

**Alexandra "Gamai" Gregory**  
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---

**From:** Yang, RobertH - AMS [<mailto:RobertH.Yang@ams.usda.gov>]  
**Sent:** Friday, December 18, 2015 12:48 PM  
**To:** Alexandra "Gamai" Gregory <[ggregory@ccof.org](mailto:ggregory@ccof.org)>  
**Cc:** Jake Lewin <[Jake@ccof.org](mailto:Jake@ccof.org)>; Amy Lamendella <[amy@ccof.org](mailto:amy@ccof.org)>  
**Subject:** RE: Clarification: Hydroponic in US/Canada Equivalence

Hello Gamai:

Thanks for bringing this to my attention.

The NOP is currently reviewing the changes to the COR standards. Your question has been forwarded to the review team. I'll let you know once I have a response for you.

Feel free to check back with me at any time to get an update on the status of the review.

Regards,

**Robert Yang**  
Accreditation Manager  
USDA National Organic Program  
Office: (202) 690-4540

---

**From:** Alexandra "Gamai" Gregory [<mailto:ggregory@ccof.org>]  
**Sent:** Thursday, December 10, 2015 4:24 PM  
**To:** Yang, RobertH - AMS <[RobertH.Yang@ams.usda.gov](mailto:RobertH.Yang@ams.usda.gov)>  
**Cc:** Lewin Jake-FASConatct <[jake@ccof.org](mailto:jake@ccof.org)>; Amy Lamendella <[amy@ccof.org](mailto:amy@ccof.org)>  
**Subject:** Clarification: Hydroponic in US/Canada Equivalence

Hello Robert,

With the recent Canadian Organic Regime (COR) standards change, we are not sure how to best honor the Canadian equivalence critical variance of prohibiting hydroponic products for export to Canada.

The COR standard has become more prescriptive as to what is classified as non-hydroponic container grown (see excerpt below), and we are not sure if we should now use these conditions to classify hydroponic product. We currently use the Canadian definition of hydroponic ("cultivation of plants in aqueous nutrient solutions without the aid of soil") and our own criteria for non-hydroponic container grown crops.

**Excerpt from CAN/CGSB-32.310-2015**

*7.5.5 The following conditions apply to containerized, staked crops (for example, tomatoes, sweet peppers, cucumbers, eggplant):*

- a) at the start of production, the total volume of soil shall consist of at least 10% compost;*
- b) compost shall be included in the fertility program;*
- c) containers shall be at least 30 cm (12 in.) high; and*
- d) the soil volume shall be at least 70 L/m<sup>2</sup> (15.4 gal./10.8 ft<sup>2</sup>), based on the total growing area*

Thank you in advance for your response,

**Alexandra "Gamai" Gregory**

Senior International & Programs Specialist

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## Schurkamp, Lynnea - AMS

---

**From:** OMIC-OCD (Yoshida) <ocd@omicnet.com>  
**Sent:** Tuesday, August 04, 2015 4:32 AM  
**To:** Yang, RobertH - AMS  
**Cc:** OMIC OCD  
**Subject:** Re: Question on Hydroponic Cultivation

Dear Mr. Robert Yang

Thank you very much for your kind assistance.  
We may revert back to you if we have any further questions.

Best Regards  
Hisashi Yoshida

-----Original Message-----

From: Yang, RobertH - AMS  
Sent: Tuesday, August 04, 2015 4:27 AM  
To: OMIC-OCD (Yoshida)  
Subject: RE: Question on Hydroponic Cultivation

Hello Hisashi Yoshida:

I have confirmed that microalgae can be certified under the USDA organic regulations. If the microalgae (ie. Spirulina) is being produced in a facility (ex. pool), then all materials (ex. nutrients and/ or sugars, pH stabilizers, substrates, etc.) must be verified to be allowed on the National List.

I hope this answers your question. Let me know if you need additional clarification.

Regards,

Robert Yang  
Accreditation Manager  
USDA National Organic Program  
1400 Independence Ave, SW  
Room 2649-South, Stop 0268  
Washington, DC 20250-0268  
Office: (202) 690-4540  
[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

-----Original Message-----

From: OMIC-OCD (Yoshida) [mailto:ocd@omicnet.com]  
Sent: Sunday, July 12, 2015 9:18 PM  
To: Yang, RobertH - AMS <RobertH.Yang@ams.usda.gov>  
Cc: OMIC OCD <ocd@omicnet.com>  
Subject: Re: Question on Hydroponic Cultivation

Dear Mr. Robert Yang

Thanks for your notice.  
We will wait for your advice.

Best Regards  
Hisashi Yoshida

-----Original Message-----

From: Yang, RobertH - AMS  
Sent: Saturday, July 11, 2015 6:38 AM  
To: OMIC-OCD Hi.Yoshida  
Cc: OMIC OCD  
Subject: RE: Question on Hydroponic Cultivation

Hello Hisashi Yoshida:

I just wanted to let you know that I'm still working on getting a response to your inquiry.

Thanks for your patience.

Regards,

Robert Yang  
Accreditation Manager  
USDA National Organic Program  
1400 Independence Ave, SW  
Room 2649-South, Stop 0268  
Washington, DC 20250-0268  
Office: (202) 690-4540  
[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

-----Original Message-----

From: OMIC-OCD Hi.Yoshida [mailto:[hi.yoshida@omicnet.com](mailto:hi.yoshida@omicnet.com)]  
Sent: Monday, June 29, 2015 12:59 AM  
To: Yang, RobertH - AMS  
Cc: OMIC OCD  
Subject: Question on Hydroponic Cultivation

Dear Mr. Robert Yang

We received an enquiry from a Chinese company for NOP certification on their following product.

Crop : Spirulina (a kind of algae to be produced in water pool not in field) Processed food : Dried powder of spirulina and other (further processing)

We understand that we are able to accept their application and step into certification process. Should it be prohibited or we are not allowed to accept the application, please kindly advise.

Best Regards  
Hisashi Yoshida

## Schurkamp, Lynnea - AMS

---

**From:** Zuck, Penelope - AMS  
**Sent:** Tuesday, June 16, 2015 11:08 AM  
**To:** Bremer, Erich; Wunderlich, Daniel; Ference, Anne Marie  
**Subject:** RE: Question on scope - hydroponics

Dear Erich,

From the information you have provided, it appears that your proposed response to this client is in accordance with NJDA's compliant policies and procedures. NJDA does not have to make accommodations to certify hydroponic operations if the program does not have the expertise to do so.

Thank you,  
Penny



**PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER |**  
USDA • AMS • NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250  
☎ 202.260.9444 | Fax 202.205.7808 | ✉ [Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)  
[Join the NOP mailing list](#)

---

**From:** Bremer, Erich [mailto:[erich.bremer@ag.state.nj.us](mailto:erich.bremer@ag.state.nj.us)]  
**Sent:** Wednesday, June 10, 2015 2:27 PM  
**To:** Zuck, Penelope - AMS; Wunderlich, Daniel; Ference, Anne Marie  
**Subject:** Question on scope - hydroponics

Dear Penny,

1. What is "At Issue," or your "Question": Please state briefly, with no more than a few sentences, the issue or the question you wish answered.

Do we **have** to make accommodations for growers who wish to do hydroponic production?

2. Relevant Standard(s): Please cite the relevant NOP standard(s), if applicable.

N / A or not sure

3. Background: Please provide the context surrounding the issue and/or why this question is relevant. As much as possible, keep this section brief and on topic.

Back in 2010, our lone hydroponic operation surrendered their certification. This certification was difficult and problematic for the NJDA, especially in terms of materials review. Just prior to that, the NOSB forwarded a formal recommendation to the NOP that stated "*Observing the framework of organic farming based on its foundation of sound management of soil biology and ecology, it becomes clear that systems of crop production that eliminate soil from the system, such as hydroponics or aeroponics, can not be considered as examples of acceptable organic farming practices.*". The Organic Trade Association forwarded comments dated April 12, 2010, to the NOSB that stated "*OTA supports keeping the NOP consistent with Canadian regulations, which currently prohibit organic labeling of agricultural products produced by hydroponic or aeroponic production methods.*".

Since the NJDA was struggling with reviews of materials used in hydroponics, as well as having great difficulties in trying to review applications from hydroponic operations (not knowing which aspects of the Rule to ignore and which to apply) the NJDA determined that they did not have the expertise to certify hydroponic operations, and notified the NOP manager that the NJDA would no longer be accepting applications for hydroponic production because we did not have the expertise necessary.

Now, we have a suspended operation who has reached the end of their suspension period and would like to become reinstated. The operation does not wish to seek certification from a different agent even though over a dozen quality agents are currently working in NJ. Yesterday we received an e-mail from the manager that stated *"I read on the USDA website that the NOP does approve certification of 'organic hydroponics'. Per what I read, the official rules of the NOP are that certifying organic hydroponics is legal and already conducted in several states. I would like to switch to that in my greenhouses, starting late fall."*

I wrote back and said:

*Hydroponics - NJDA does not do organic hydroponic operations. We stopped in 2010 when our last one dropped their certification, and will not be doing any more hydroponics in the future. We do not have the expertise to certify such systems; however, many of the agents (not all) who are working in New Jersey will still certify hydroponics. If you are setting up some hydroponics, let me know and I can double check to see who does it and give you some recommendations.*

The manager wrote back this morning to ask:

*I am not clear from your response whether adding this to my operation means you will not certify the farm as a whole and I have to find a certifying agent other than NJDA, or if it means I have to find an alternate agent to NJDA but ONLY for the hydroponic part? Can you clarify?*

4. Proposed Solution(s): This is your opportunity to provide valuable input and insight. Since you have a greater understanding of the specific circumstances, you may be better equipped to foresee and suggest a solution. Your solution should be supported by the information in the other sections.

The NJDA does not certify hydroponic operations because we do not have the expertise. We would like to tell the client that while we can certify his operation, while excluding his hydroponic production, due to the cost of certifications and the paperwork involved it would not make sense. It would make the most sense if he went to another agent for the entire operation – BUT – if he truly WANTED to, NJDA could certify the farm, and he could pay another agent to come in and certify the greenhouse.

This is what I would like to tell the grower, but wanted to clear with the NOP first.

5. Attachment(s): Relevant documents and/or links, if applicable.

<http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5084677>

[http://ota.com/sites/default/files/indexed\\_files/OTA\\_crops\\_greenhousesfinal%5B2%5D.pdf](http://ota.com/sites/default/files/indexed_files/OTA_crops_greenhousesfinal%5B2%5D.pdf)

6. Urgency: If you are facing a deadline or under a time constraint, please indicate this to me. If I have this information, I will be better able to prioritize your question(s).

Very urgent. The suspension period is over (ended May 27, 2015). It is important to get information to this client as quickly as possible so that he can decide which route to take to become reinstated – continue to work with NJDA, go to another agent, or work with two agents.

Thanks in advance.

Erich B.

Erich V. Bremer  
Supervisor, Organic Certification Program  
New Jersey Department of Agriculture  
Division of Marketing and Development  
369 S. Warren Street  
PO Box 330  
Trenton, NJ 08625-0330  
609-984-2225  
609-341-3212(fax)  
[erich.bremer@ag.state.nj.us](mailto:erich.bremer@ag.state.nj.us)

## Schurkamp, Lynnea - AMS

---

**From:** Crail, Lars - AMS  
**Sent:** Friday, February 06, 2015 10:13 AM  
**To:** ??? Mayme Lee  
**Subject:** Re: aquaponic production

Aquatic plants are kelp, spiraling, etc. Aquaponic operations do incorporate fish effluents as fertilizer. You may speak to MCIA about aquaponics. I visited an operation that were growing fish in tanks and the water was used to grow plants hydroponically. All this conducted in a warehouse.

The only place you may find information on any of these systems is where we maintain NOSB recommendations on the NOP website. The NOP hasn't published any guidance. In May cases, Certifiers are setting up their own requirements.

Lars Crail  
USDA AMS NOP  
202.631.2105 mobile

On Feb 6, 2015, at 3:19 AM, 李曉梅 Mayme Lee <[toc531lee@tw-toc.com](mailto:toc531lee@tw-toc.com)> wrote:

Hi Lars,

Is aquaponic production same as aquaculture (fish)? I thought aquaculture is like seaweed or Spirulina and aquaponic is like growing vegetables with the help of fish.

But actually we want to learn all of them hydroponic production, Aquaculture (fish) and aquaponic production. We haven't had this kind of applicant so far.

Look forward to Aquaculture standards and guidance for hydroponic coming out this year. Do you know any standards so far NOP have published? "Discussions on Guidance Statements Relative to Soil-less Growing Systems April 2008" is the only thing I found. How come OTCO developed so well-organised FAQs since there is no official standards from NOP now?

We are still studying the FAQs from OTCO and "Discussions on Guidance Statements Relative to Soil-less Growing Systems April 2008". Thanks for the reference of Cindy Wippler MCIA! We may contact her in the future. Really appreciate it!

Best regards,  
Mayme

慈心有機驗證股份有限公司 Tse-Xin Organic Certification Corporation

李曉梅 Mayme Lee

電話：(02)2546-0654, 分機：531

傳真：(02)2546-1266

Email：[toc531lee@tw-toc.com](mailto:toc531lee@tw-toc.com)

<http://tw-toc.com/>

2015-02-05 2:37 GMT+08:00 Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>:

Hi Mayme,

Are you referring to hydroponic production (soil-less plant production) or Aquaculture (fish)? We should have Aquaculture standards out for public comment this year. We also plan to have guidance issued for hydroponic this year too.

There are hydroponic operations certified by USDA organic certifying bodies. NOP has not provided any guidance on this topic to certifiers or operations, but has not disallowed certification of hydroponic operations.

If you wish, you may contact Minnesota Crop Improvement Association (MCIA) and speak to Cindy Wippler (Program Manager) about these types of operations. They have certified hydroponics and there is at least one fish farm that is waiting for the organic regulations on Aquaculture to be released in order to become certified. You may mention to Cindy ([wippl001@umn.edu](mailto:wippl001@umn.edu)) that I advised you to contact them and to learn about how to certify hydroponics.

Is TOC a member of the Accreditation Certifiers Association (ACA) (<http://www accreditedcertifiers.org/>)? ACA has a Listserv where you can participate and ask other certifiers questions.

Regards,

Lars Crail

USDA NOP

[202.205.5536](tel:202.205.5536) office

[202.631.2105](tel:202.631.2105) mobile

**From:** 李曉梅 Mayme Lee [mailto:[toc531lee@tw-toc.com](mailto:toc531lee@tw-toc.com)]

**Sent:** Wednesday, February 04, 2015 5:18 AM

**To:** Crail, Lars - AMS

**Cc:** 陳怡靜; 余乃馨

**Subject:** aquaponic production

Hi Lars,

I am writing to know any USDA NOP standards for aquaponic production. How to evaluate and certify the aquaponic production?

I browsed NOP web site and got the following document. Is this all?

<http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5069160>

I also browsed OTCO web site and got some ideas but I was not sure if that's accorded with USDA NOP.

<http://tilth.org/farmers/otco-hydroponic-faqs>

Please give us some help.

Thank you,

Mayme

慈心有機驗證股份有限公司 Tse-Xin Organic Certification Corporation

李曉梅 Mayme Lee

電話：(02)2546-0654, 分機: 531

傳真：(02)2546-1266

Email： [toc531lee@tw-toc.com](mailto:toc531lee@tw-toc.com)

<http://tw-toc.com/>

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## Schurkamp, Lynnea - AMS

---

**From:** Gebault King, ReneeA - AMS  
**Sent:** Monday, December 22, 2014 2:23 PM  
**To:** Webster, Georgana  
**Subject:** RE: aquaponics question

Hello Georgana,

Thank you for contacting the USDA National Organic Program (NOP) with your question regarding aquaponics.

Generally, plant production systems are eligible for organic certification as long as the production methods, material inputs and labeling meet all current [USDA organic regulations](#) for crops. However, since there are no USDA organic regulations pertaining to aquaculture production this type of production is not currently eligible for organic certification.

In your original question (below) you mentioned "the latest information the NOP sent regarding aquaponics/aquaculture..." I may be able to provide you with additional details if you could provide this information to me so I may better understand the foundation of your inquiry. If you have more questions or need more information, please let me know.

Happy Holidays to you!

Kind regards,

*Renee*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312  
Mobile: 202.770.8672  
[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

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Room 2647-South, Stop 0268  
Washington, D.C. 20250-0268  
Main Tel: 202.720.3252  
Fax: 202.205.7808  
[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

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**From:** Webster, Georgana [<mailto:GWebster@mt.gov>]  
**Sent:** Tuesday, December 09, 2014 3:41 PM  
**To:** Mann, Renee - AMS  
**Subject:** Aquaponics

*Renee,*

*I have reviewed the latest information the NOP sent regarding aquaculture/aquaponics which indicated NOP comment would be made in 2015.*

*I recently had someone contact me that noted that there are already accredited certifiers organically certifying aquaponic systems.*

*Is this true?*

*They indicated they were using the proposed guidelines on file from previous NOP rule making. Please advise.*

*Thank you,*

*Georgana*

Georgana Webster  
Organic Program Manager  
Montana Department of Agriculture  
302 North Roberts  
Helena, Montana  
59601  
Office: 406-444-9421  
Fax: 406-444-9466  
Email: [gwebster@mt.gov](mailto:gwebster@mt.gov)

---

**From:** Webster, Georgana [mailto:GWebster@mt.gov]

**Sent:** Thursday, December 18, 2014 4:14 PM

**To:** Gebault King, ReneeA - AMS

**Subject:** RE: aquaponics question

*Oops*

*I thought I might have got that wrong.*

*Sorry.*

*g*

Georgana Webster  
Organic Program Manager  
Montana Department of Agriculture  
302 North Roberts  
Helena, Montana  
59601  
Office: 406-444-9421  
Fax: 406-444-9466  
Email: [gwebster@mt.gov](mailto:gwebster@mt.gov)

---

**From:** Gebault King, ReneeA - AMS [<mailto:ReneeA.GebaultKing@ams.usda.gov>]  
**Sent:** Thursday, December 18, 2014 2:12 PM  
**To:** Webster, Georgana  
**Subject:** aquaponics question

Hi Georgana,

A question you submitted regarding aquaponics was recently forwarded to me. I'm working on it and will contact you soon.

There are two "Renees" at the NOP now, Renee Mann and me, your new Accreditation Manager, which has been an interesting adjustment for all of us. In future, please send your questions directly to me and I'll do my best to get you the information you need. Besides, I'm from Wyoming and I enjoy hearing from my Montana neighbors anytime. ☺

Happy Holidays to you!

Kind regards,

*Renée*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312  
Mobile: 202.770.8672  
[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

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## Schurkamp, Lynnea - AMS

---

**From:** Gebault King, ReneeA - AMS  
**Sent:** Thursday, March 05, 2015 12:59 PM  
**To:** Sarah Costin  
**Subject:** RE: Attachment for paper

Hello Sarah,

Thank you for sending the document. I will review it and share with others.

Kind regards,

*Renée*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312  
Mobile: 202.770.8672  
[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

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Fax: 202.205.7808  
[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

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**From:** Sarah Costin [mailto:(b) (6)@gmail.com]  
**Sent:** Thursday, March 05, 2015 12:49 PM  
**To:** Gebault King, ReneeA - AMS  
**Subject:** Attachment for paper

Hi Renee,

I believe I already sent you the MSDS. Here's the other attachment.

Best,  
Sarah

Sarah Costin  
Co-Creator/Owner

A Bee Organic

40707 Daily Road  
De Luz, CA 92028  
760-731-0155

## Schurkamp, Lynnea - AMS

---

**From:** Gebault King, ReneeA - AMS  
**Sent:** Friday, February 20, 2015 10:08 AM  
**To:** Sarah Costin  
**Subject:** RE: Fact sheet on paper being used as container

Hello Sarah,

Thank you for providing the fact sheet on the paper container. This is very helpful.

Kind regards,

*Renée*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312  
Mobile: 202.770.8672  
[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

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**From:** Sarah Costin [mailto:sarah@abeeorganic.com]  
**Sent:** Thursday, February 19, 2015 4:06 PM  
**To:** Gebault King, ReneeA - AMS  
**Subject:** Fact sheet on paper being used as container

Hi Renee,

The grower just sent this fact sheet on the paper being used as a container.

Sarah

Sarah Costin  
Co-Creator/Owner



A Bee Organic  
40707 Daily Road  
De Luz, CA 92028  
[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

## Schurkamp, Lynnea - AMS

---

**From:** Gebault King, ReneeA - AMS  
**Sent:** Friday, May 20, 2016 10:54 AM  
**To:** 'Fabia Montalbani'  
**Cc:** Lopez, JasonJ - AMS  
**Subject:** RE: hydroponics (soil - less) organic certification to the USDA National Organic Program standards.

Buongiorno Fabia!

Sto molto bene. Spero che tu stia bene, anche.

I am very happy to receive your e-mail. Currently, the USDA does allow for the organic certification of hydroponic operations as long as the operation can demonstrate full compliance with the USDA organic regulations. For more information, please review the [February 10, 2015 training slides](#) (slides #23-27 address hydroponics).

The USDA National Organic Standards Board (NOSB) has formed a [Hydroponic and Aquaponic Task Force](#) to further research this production approach. The task force will report to the National Organic Standards Board (NOSB) and is expected to present its report to the board in the Fall of 2016.

Remember, the [NOSB](#) makes *recommendations* to the USDA NOP, but these are not law; certifiers and operations are expected to comply with the USDA organic regulations in [7 CFR 205](#). So, for now it is possible for USDA accredited certifiers to certify hydroponic operations. In the future, if any hydroponics recommendations become law, they will become part of the USDA organic regulations and all certifiers will be notified in advance.

I hope this addresses your questions, but please contact Jason Lopez (202.260.9445 or [JasonJ.Lopez@ams.usda.gov](mailto:JasonJ.Lopez@ams.usda.gov)) or me if you need more information.

By the way, I just learned that I will be in Bologna for a few days, 19-24 June. Perhaps we could meet for vino or gelato? It would be fun to see "mia sorella di undici undici!"

Ciao!

Kind regards,

*Renée*

Renée Gebault King, Ph.D.  
Accreditation Manager

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[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

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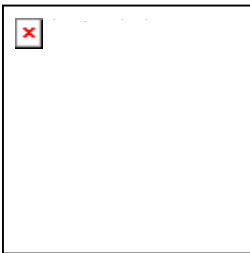
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**From:** Fabia Montalbani [mailto:fabia.montalbani@icea.bio]  
**Sent:** Thursday, May 19, 2016 4:09 AM  
**To:** Gebault King, ReneeA - AMS <ReneeA.GebaultKing@ams.usda.gov>  
**Subject:** hydroponics (soil - less) organic certification to the USDA National Organic Program standards.

Buongiorno Renee, come stai?  
I hope you are fine and hopefully your family!

I'm sorry to disturb you but I have a question about hydroponics (soil - less) organic certification. I have read the attached document, but I don't understand whether these crops are certifiable. Can you help me to understand?  
Thanks in advance,

Fabia



**Fabia Montalbani**

Segreteria Tecnica schemi di certificazione NOP, JAS e BIO 834  
Sede ICEA Centrale: Via G. Brugnoli n.15 - 40122 Bologna;  
Tel: +39 051 272 986 | E-mail: [fabia.montalbani@icea.bio](mailto:fabia.montalbani@icea.bio)  
Website: [www.icea.bio](http://www.icea.bio)

## Schurkamp, Lynnea - AMS

---

**From:** Davis, Graham - AMS  
**Sent:** Monday, October 24, 2016 3:08 PM  
**To:** Lennea Morris  
**Cc:** Courtney, Cheri - AMS; Mann, Renee - AMS  
**Subject:** RE: NOP Certification in Taiwan

Good afternoon Lennea,

Thank you for your question regarding certification of an operation in Taiwan. I apologize for the delayed response. The trade arrangement between the US and Taiwan includes all USDA organic products produced in the United States or its territories. USDA organic products produced outside the United States are not included in this arrangement. As such, the description of your situation would not be covered under the arrangement.

The NOP doesn't have any restrictions that would prohibit any certifier from certifying an operation to the USDA Organic Regulations in Taiwan. Organic Certifiers, however, should contact Taiwan's Agriculture and Food Agency (AFA) of the Council of Agriculture (COA) for information regarding certifying operations in their country. I hope this information is helpful to you.

Graham

**Graham Davis**  
**Accreditation Manager**  
**USDA | NATIONAL ORGANIC PROGRAM**  
**1400 Independence Ave SW | 2649-S | Washington DC 20250**  
**Desk: 202-692-0047 | Cell: 202-595-4946**



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---

**From:** Lennea Morris [mailto:lennea@occert.com]  
**Sent:** Tuesday, October 18, 2016 11:35 AM  
**To:** Davis, Graham - AMS <Graham.Davis@ams.usda.gov>  
**Subject:** RE: NOP Certification in Taiwan

Hi Graham,

Ah yes, totally forgot you guys had a question template to follow, my apologies, I will insert my question into the template provided below:

1. *What is "At Issue," or your "Question":* Can we certify a hydroponic / aquaponic operator in Taiwan to the USDA NOP Regulations and would this operator be able to sell their product locally in Taiwan without any issues?
2. *Relevant Standard(s):* no specific regulation, more related to international trade arrangements.
3. *Background:* We have an interested operator in Taiwan looking to get certified by Organic Certifiers.
4. *Proposed Solution(s):* After reviewing all the material available to us online, we as a certifier are under the impression that we can certify an operator in Taiwan to the USDA NOP Regulations. With the current Export

Arrangement between the US and Taiwan, it does not exclude products produced with hydroponic or aquaponic methods, therefore, it leads us to believe we can certify this applicant.

5. Attachment(s): <https://www.ams.usda.gov/services/organic-certification/international-trade/Taiwan>

This is an urgent matter as this operator has been waiting for us to give them a response based on our communications with you.

Please let me know if you need anything further or have any other questions.

Thank you,



---

**From:** Davis, Graham - AMS [<mailto:Graham.Davis@ams.usda.gov>]  
**Sent:** Tuesday, October 18, 2016 7:20 AM  
**To:** Lennea Morris <[lennea@occert.com](mailto:lennea@occert.com)>  
**Subject:** RE: NOP Certification in Taiwan

Good morning Lennea.

Before I respond to your question, I was reminded that all questions should be submitted using the template so that I can better respond to the question. I have provide a copy of our temple below:

#### *Question Template*

1. What is "At Issue," or your "Question": Please state briefly, with no more than a few sentences, the issue or the question you wish answered.
2. Relevant Standard(s): Please cite the relevant NOP standard(s), if applicable.
3. Background: Please provide us the context surrounding the issue and/or why this question is relevant. As much as possible, keep this section brief and on topic.
4. Proposed Solution(s): This is your opportunity to provide us valuable input and insight. Since you have a greater understanding of the specific circumstances, you may be better equipped to foresee and suggest a solution. Your solution should be supported by the information in the other sections.
5. Attachment(s): Relevant documents and/or links, if applicable.

Urgency: If you are facing a deadline or under a time constraint, please indicate this to me. If I have this information, I will be better able to prioritize your question(s).

Thank you.

Graham

**Graham Davis**  
**Accreditation Manager**  
**USDA | NATIONAL ORGANIC PROGRAM**  
**1400 Independence Ave SW | 2649-S | Washington DC 20250**  
**Desk: 202-692-0047 | Cell: 202-595-4946**



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---

**From:** Lennea Morris [<mailto:lennea@occert.com>]  
**Sent:** Thursday, September 29, 2016 6:21 PM  
**To:** Davis, Graham - AMS <[Graham.Davis@ams.usda.gov](mailto:Graham.Davis@ams.usda.gov)>  
**Subject:** NOP Certification in Taiwan

Hello Graham,

Hope you are doing well! Nice to meet you over email.

We do have an international question for you. After reviewing all the material available to us, we as a certifier are under the impression that we can certify an operator in Taiwan to the USDA NOP Regulations. The kicker here is that this interested applicant is a hydronic / aquaponic operator who plans to sell locally within Taiwan. With the current Export Arrangement between the US and Taiwan, it does not exclude products produced with hydroponic or aquaponic methods, therefore, it leads us to believe we can certify this applicant. Can you please confirm our thought process is correct?

Thank you so much for your time!!

Sincerely,



**Lennea Morris**  
**Operations Manager**  
Office Phone: (805) 684-6494  
Direct Line: (951) 795-4342  
Website: [www.organiccertifiers.com](http://www.organiccertifiers.com)  
  

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## Schurkamp, Lynnea - AMS

---

**From:** Gebault King, ReneeA - AMS  
**Sent:** Thursday, March 05, 2015 8:30 AM  
**To:** Sarah Costin  
**Cc:** Ro Elgas  
**Subject:** RE: Paper container- information from the manufacturer

Good morning, Sarah-

I have reviewed the information in the e-mail chain. It looks like there may be an attachment or two missing? If so, and if you have permission to share, could you please forward any missing attachments to me?

Thanks!

Kind regards,

*Renée*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312  
Mobile: 202.770.8672  
[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

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[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

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---

**From:** Sarah Costin [mailto:sarah@abeeorganic.com]  
**Sent:** Tuesday, March 03, 2015 4:06 PM  
**To:** Gebault King, ReneeA - AMS  
**Cc:** Ro Elgas  
**Subject:** Paper container- information from the manufacturerHi Renee,

Hi Renee,

I'm forwarding you information that was sent to me from the manufacturer of the paper container, known as Ellepot ECO" in hopes that it will move review forward.

Best,

Sarah

---

**From:** Bjarne B. Pedersen [<mailto:bbp@ellepot.dk>]  
**Sent:** Tuesday, March 3, 2015 12:46 PM  
**To:** Sarah Costin  
**Cc:** Ro Elgas  
**Subject:** SV: Update

Dear Sarah,

I don't know the schedule for NOP meeting but I have some additional information regarding the use of our product.

(b) (4)

A large rectangular area of the email body is completely redacted with black ink. The redaction covers approximately 80% of the page width and 40% of the page height. The text "(b) (4)" is written in red at the top left corner of this redacted area.A second large rectangular area of the email body is completely redacted with black ink, similar in size and position to the first redaction. It covers approximately 80% of the page width and 40% of the page height.

Please let me know your thoughts on this and don't hesitate to contact me if you have questions.

Kind regards  
Bjarne

---

**Fra:** Sarah Costin [<mailto:sarah@abeeorganic.com>]  
**Sendt:** 25. februar 2015 19:30  
**Til:** Bjarne B. Pedersen  
**Cc:** Ro Elgas  
**Emne:** RE: Update

Dear Bjarne,

Thank you very much for this information- it should assist the NOP reviewers in making a fact-based decision. We appreciate your willingness to provide it so quickly. Except for sharing with the NOP reviewers we will treat it as confidential.

Would you like to be informed of the review outcome?

Best regards,  
Sarah and Ro  
Sarah Costin and Ro Elgas  
Co-Creators/Owners



A Bee Organic  
40707 Daily Road  
De Luz, CA 92028  
[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

---

**From:** Bjarne B. Pedersen [<mailto:bbp@ellepot.dk>]  
**Sent:** Wednesday, February 25, 2015 12:46 AM  
**To:** Sarah Costin; Ro Elgas  
**Subject:** SV: Update

Dear Sarah and Ro,

The product is nonwoven made of PLA fibres.

As I understand there are two steps here:

1. The use of this container is similar to the use of a plastic pot and if the grower provide a management program in his Contamination Avoidance Plan this should be within the line of organic regulations.
2. The use of this container above ground and afterwards composting in a commercial facility according to the ASTM D6400 the material will biodegrade 100%.

We have just finalized our accreditation on this product for composting according to DIN EN 13432:2000-12 and ASTM D6400:2004-01

I have attached the certificate to this mail.

If you need any further information please don't hesitate to contact me.

**Venlig hilsen / With regards**

Bjarne B. Pedersen  
B. Eng. Development ID  
Direct no.: +45 7614 7663  
Mobile no.: (b) (6)  
[bbp@ellepot.dk](mailto:bbp@ellepot.dk)

---

**Ellegaard as**  
Storstrømsvej 55  
DK-6715 Esbjerg N  
Tel.: +45 7614 7676

Fax: +45 7614 7660  
[www.ellepot.dk](http://www.ellepot.dk)

---

**Fra:** Pierre Sleiman [<mailto:Pierre@GoGreenAgriculture.com>]

**Sendt:** 25. februar 2015 05:38

**Til:** Sarah Costin; Ro Elgas

**Cc:** Bjarne B. Pedersen

**Emne:** Fwd: Update

Hi Bjarne,

Thank you for offering your assistance.

Sarah and Ro,

Please find below Bjarne's contact info. Bjarne can furnish you more specific data on the paper that we are looking to have approved for organic production by the NOP. Due to confidentiality reasons, it is most efficient if Bjarne communicates with you directly to provide all relevant data regarding the paper to make our case to the NOP/NOSB.

Again, I just want to restate our proposed use of the paper to be used: as an above ground pot to hold a mix of OMRI approved materials such as peat, perlite, compost and microbiology.

I don't want to offer more detail than necessary that will result in unnecessary confusion/scrutiny, but I think if Bjarne sends you everything he has, you can submit the relevant information at your discretion.

Please advise.

**Venlig hilsen / With regards**

Bjarne B. Pedersen

B. Eng. Development ID

Direct no.: +45 7614 7663

Mobile no.: (b) (6)

[bbp@ellepot.dk](mailto:bbp@ellepot.dk)

Kind Regards,

**Pierre** Sleiman Jr



c [REDACTED]  
O 760.634.2506  
495 Saxony Rd



Encinitas, CA 92024

[www.GoGreenAgriculture.com](http://www.GoGreenAgriculture.com)

Named "Champion of Change" in "The Future of Agriculture" by President Obama

Begin forwarded message:

**From:** "Bjarne B. Pedersen" <[bbp@ellepot.dk](mailto:bbp@ellepot.dk)>

**To:** Lars Jensen <[LPJ@blackmoreco.com](mailto:LPJ@blackmoreco.com)>, Pierre Sleiman <[Pierre@GoGreenAgriculture.com](mailto:Pierre@GoGreenAgriculture.com)>

**Subject: SV: Update**

**Date:** February 24, 2015 at 4:55:27 AM PST

Dear Pierre,

Just to confirm mail from Lars, please have your certifying agent contact me for any specific product details or questions regarding the PLA paper.

Also if you like you could send me your description of the product you have applied for, just to make me fully understand it all.

**Venlig hilsen / With regards**

Bjarne B. Pedersen

B. Eng. Development ID

Direct no.: +45 7614 7663

Mobile no.: (b) (6)

[bbp@ellepot.dk](mailto:bbp@ellepot.dk)

---

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Tel.: +45 7614 7676

Fax: +45 7614 7660

[www.ellepot.dk](http://www.ellepot.dk)

---

**Fra:** Lars Jensen [<mailto:LPJ@blackmoreco.com>]

**Sendt:** 24. februar 2015 01:20

**Til:** Pierre Sleiman

**Cc:** Bjarne B. Pedersen

**Emne:** Re: Update

Hi Pierre

I spoke with Bjarne and they are ready to provide any needed info.

The best, easiest and quickest way would be for your certifier to email Bjarne directly.

He understands the importance of this and I've also stressed out to him that what you have applied for is a bottomless pot made of pla.

I hope it works out - thanks for working with us on it.

Best regards  
Lars Jensen

Den Feb 20, 2015 kl. 10:56 PM skrev Pierre Sleiman <[Pierre@GoGreenAgriculture.com](mailto:Pierre@GoGreenAgriculture.com)>:

Perfect. Thank you. I will make the case that the paper will be used to make above ground pots. If you can help me make the case that they are made from natural substances and are biodegradable, that will help a lot.

Best,

**Pierre** Sleiman Jr

C (b) (6)  
O 760.634.2506  
495 Saxony Rd  
Encinitas, CA 92024  
[www.GoGreenAgriculture.com](http://www.GoGreenAgriculture.com)  
Named "Champion of Change" in "The Future of Agriculture" by President Obama

On Feb 20, 2015, at 7:50 PM, Lars Jensen <[LPJ@blackmoreco.com](mailto:LPJ@blackmoreco.com)> wrote:

Hi Pierre

I will get the guys in Denmark involved Asap and see if we can't get more specific info.

Best regards  
Lars Jensen

Den Feb 20, 2015 kl. 10:28 PM skrev Pierre Sleiman  
<[Pierre@GoGreenAgriculture.com](mailto:Pierre@GoGreenAgriculture.com)>:

Hi Lars,

I just wanted to update you. The NOP has an advisory board called the "National Organic Standards Board" aka NOSB that makes recommendations to the NOP as to how to take a stance on materials and processes.

Well, our certifier was notified that the evaluation for the paper has been forwarded to the NOSB for review. This is as official as it gets. My only concern is that they have enough information and that they look at this within the context of the application that we are asking to use it.

I'm going to try to step in to make sure that they have the full and correct set of facts. If there is any further information about the

paper, please share. Typically, you only get one shot - an appeal is much more difficult to turn over an original decision. Time is of the essence.

Best Regards,

**Pierre** Sleiman Jr

c [REDACTED]  
o 760.634.2506  
495 Saxony Rd  
Encinitas, CA 92024

[www.GoGreenAgriculture.com](http://www.GoGreenAgriculture.com)

Named "Champion of Change" in "The Future of Agriculture" by President Obama

## Schurkamp, Lynnea - AMS

---

**From:** Gebault King, ReneeA - AMS  
**Sent:** Tuesday, March 03, 2015 4:20 PM  
**To:** Sarah Costin  
**Cc:** Ro Elgas  
**Subject:** RE: Paper container- information from the manufacturerHi Renee,

Hello Sarah and Ro,

Thank you for providing this information. I will share it with others in the NOP.

Kind regards,

*Renee*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312  
Mobile: 202.770.8672  
[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

USDA National Organic Program  
1400 Independence Ave SW  
Room 2649-South, Stop 0268  
Washington, D.C. 20250-0268  
Main Tel: 202.720.3252  
Fax: 202.205.7808  
[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

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---

**From:** Sarah Costin [mailto:sarah@abeeorganic.com]  
**Sent:** Tuesday, March 03, 2015 4:06 PM  
**To:** Gebault King, ReneeA - AMS  
**Cc:** Ro Elgas  
**Subject:** Paper container- information from the manufacturerHi Renee,

Hi Renee,

I'm forwarding you information that was sent to me from the manufacturer of the paper container, known as Ellepot ECO" in hopes that it will move review forward.

Best,  
Sarah

---

**From:** Bjarne B. Pedersen [<mailto:bbp@ellepot.dk>]  
**Sent:** Tuesday, March 3, 2015 12:46 PM  
**To:** Sarah Costin  
**Cc:** Ro Elgas  
**Subject:** SV: Update

Dear Sarah,

I don't know the schedule for NOP meeting but I have some additional information regarding the use of our product.

(b) (4)



Please let me know your thoughts on this and don't hesitate to contact me if you have questions.

Kind regards  
Bjarne

---

**Fra:** Sarah Costin [<mailto:sarah@abeeorganic.com>]  
**Sendt:** 25. februar 2015 19:30  
**Til:** Bjarne B. Pedersen  
**Cc:** Ro Elgas  
**Emne:** RE: Update

Dear Bjarne,

Thank you very much for this information- it should assist the NOP reviewers in making a fact-based decision. We appreciate your willingness to provide it so quickly. Except for sharing with the NOP reviewers we will treat it as confidential.

Would you like to be informed of the review outcome?

Best regards,

Sarah and Ro  
Sarah Costin and Ro Elgas  
Co-Creators/Owners



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[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

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**From:** Bjarne B. Pedersen [<mailto:bbp@ellepot.dk>]  
**Sent:** Wednesday, February 25, 2015 12:46 AM  
**To:** Sarah Costin; Ro Elgas  
**Subject:** SV: Update

Dear Sarah and Ro,

The product is nonwoven made of PLA fibres.

As I understand there are two steps here:

1. The use of this container is similar to the use of a plastic pot and if the grower provide a management program in his Contamination Avoidance Plan this should be within the line of organic regulations.
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**Venlig hilsen / With regards**

Bjarne B. Pedersen  
B. Eng. Development ID  
Direct no.: +45 7614 7663  
Mobile no.: (b) (6)  
[bbp@ellepot.dk](mailto:bbp@ellepot.dk)

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Fax: +45 7614 7660  
[www.ellepot.dk](http://www.ellepot.dk)

---

**Fra:** Pierre Sleiman [<mailto:Pierre@GoGreenAgriculture.com>]

**Sendt:** 25. februar 2015 05:38

**Til:** Sarah Costin; Ro Elgas

**Cc:** Bjarne B. Pedersen

**Emne:** Fwd: Update

Hi Bjarne,

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Please find below Bjarne's contact info. Bjarne can furnish you more specific data on the paper that we are looking to have approved for organic production by the NOP. Due to confidentiality reasons, it is most efficient if Bjarne communicates with you directly to provide all relevant data regarding the paper to make our case to the NOP/NOSB.

Again, I just want to restate our proposed use of the paper to be used: as an above ground pot to hold a mix of OMRI approved materials such as peat, perlite, compost and microbiology.

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Kind Regards,

**Pierre** Sleiman Jr



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O 760.634.2506

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Encinitas, CA 92024

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Begin forwarded message:

**From:** "Bjarne B. Pedersen" <[bbp@ellepot.dk](mailto:bbp@ellepot.dk)>  
**To:** Lars Jensen <[LPJ@blackmoreco.com](mailto:LPJ@blackmoreco.com)>, Pierre Sleiman <[Pierre@GoGreenAgriculture.com](mailto:Pierre@GoGreenAgriculture.com)>  
**Subject: SV: Update**  
**Date:** February 24, 2015 at 4:55:27 AM PST

Dear Pierre,

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**Sendt:** 24. februar 2015 01:20  
**Til:** Pierre Sleiman  
**Cc:** Bjarne B. Pedersen  
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Best regards



Lars Jensen

Den Feb 20, 2015 kl. 10:56 PM skrev Pierre Sleiman <[Pierre@GoGreenAgriculture.com](mailto:Pierre@GoGreenAgriculture.com)>:

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**Pierre** Sleiman Jr

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Lars Jensen

Den Feb 20, 2015 kl. 10:28 PM skrev Pierre Sleiman  
<[Pierre@GoGreenAgriculture.com](mailto:Pierre@GoGreenAgriculture.com)>:

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## Schurkamp, Lynnea - AMS

---

**From:** Sarah Costin <sarah@abeeorganic.com>  
**Sent:** Thursday, February 19, 2015 12:42 PM  
**To:** Gebault King, ReneeA - AMS  
**Cc:** Ro Elgas  
**Subject:** RE: Question about a container

Hi Renee,

When you say "some time", approximately how much time? This grower needs to get tests started ASAP to comply with the NOP timing on OASIS. I know you are busy- is there someone to whom you could pass this if you can't respond before you leave?

Sincerely,  
Sarah

Sarah Costin  
Co-Creator/Owner



A Bee Organic  
40707 Daily Road  
De Luz, CA 92028  
[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

---

**From:** Gebault King, ReneeA - AMS [mailto:ReneeA.GebaultKing@ams.usda.gov]  
**Sent:** Thursday, February 19, 2015 5:14 AM  
**To:** Sarah Costin  
**Subject:** RE: Question about a container

Hello Sarah,

It was very nice to meet you and Ro in person in Little Rock. I hope you are feeling better! ☺

I received your question and am preparing a response for you. Please note that I am headed out of the country in two days so it will take me some time.

Kind regards,

Renée

Renée Gebault King, Ph.D.

Accreditation Manager

Office: 202.690.1312

Mobile: 202.770.8672

[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

USDA National Organic Program

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Room 2649-South, Stop 0268

Washington, D.C. 20250-0268

Main Tel: 202.720.3252

Fax: 202.205.7808

[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

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---

**From:** Sarah Costin [mailto:sarah@abeeorganic.com]  
**Sent:** Friday, February 13, 2015 6:04 PM  
**To:** Gebault King, ReneeA - AMS

**Cc:** Ro Elgas

**Subject:** Question about a container

Hi Renee,

It was nice to meet you in Little Rock. I was operating at about 50%- sorry to not be more communicative, and I hope I didn't pass on my cold! It seemed that ¼ of the room was sick...

I have a question for you regarding a container for grow media:

1. What is "At Issue": Is a container for grow media made from biodegradable PLA paper compliant?
2. Relevant Standard(s): None. At this time assorted containers, including plastics and molded fibers, to hold grow media are routinely used by growers (terrestrial and hydroponic) without being included on the National List.
3. Background: A client is transitioning from OASIS containers to OMRI approved grow media in a container. He is understandably nervous and does not want to encounter an issue with the container that will hold the grow media. The container is made from PLA (polylactic acid), a biodegradable paper. He would like to use this type of container because it is created from renewable resources (corn starch) with less environmental impact than plastic and is fully biodegradable. The client would like written approval of the container from NOP prior to starting tests.
4. Proposed Solution(s): NOP provides a written approval of this specific type of container or an approval of containers in general that includes this type of container.
5. Attachments: none
6. Urgency: Moderately high. There is a limited timeframe for product testing.

Thank you for your assistance with this.

Sarah

Sarah Costin

Co-Creator/Owner



A Bee Organic

40707 Daily Road

De Luz, CA 92028

[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

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## Schurkamp, Lynnea - AMS

---

**From:** Gebault King, ReneeA - AMS  
**Sent:** Thursday, February 19, 2015 8:14 AM  
**To:** Sarah Costin  
**Subject:** RE: Question about a container

Hello Sarah,

It was very nice to meet you and Ro in person in Little Rock. I hope you are feeling better! 😊

I received your question and am preparing a response for you. Please note that I am headed out of the country in two days so it will take me some time.

Kind regards,

*Renee*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312  
Mobile: 202.770.8672  
[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

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---

**From:** Sarah Costin [mailto:sarah@abeeorganic.com]  
**Sent:** Friday, February 13, 2015 6:04 PM  
**To:** Gebault King, ReneeA - AMS  
**Cc:** Ro Elgas  
**Subject:** Question about a container

Hi Renee,

It was nice to meet you in Little Rock. I was operating at about 50%- sorry to not be more communicative, and I hope I didn't pass on my cold! It seemed that ¼ of the room was sick...

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3. Background: A client is transitioning from OASIS containers to OMRI approved grow media in a container. He is understandably nervous and does not want to encounter an issue with the container that will hold the grow media. The container is made from PLA (polylactic acid), a biodegradable paper. He would like to use this type of container because it is created from renewable resources (corn starch) with less environmental impact than plastic and is fully biodegradable. The client would like written approval of the container from NOP prior to starting tests.
4. Proposed Solution(s): NOP provides a written approval of this specific type of container or an approval of containers in general that includes this type of container.
5. Attachments: none
6. Urgency: Moderately high. There is a limited timeframe for product testing.

Thank you for your assistance with this.

Sarah  
Sarah Costin  
Co-Creator/Owner



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[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

## Schurkamp, Lynnea - AMS

---

**From:** Gebault King, ReneeA - AMS  
**Sent:** Tuesday, March 17, 2015 2:48 PM  
**To:** Sarah Costin  
**Cc:** Ro Elgas ; Courtney, Cheri - AMS; Mann, Renee - AMS  
**Subject:** RE: TechMek container

Dear Sarah,

Thank you for contacting me with your question.

The USDA National Organic Program (NOP) reviewed the TechMek material based upon the document provided and issued a decision to you on March 10, 2015 as follows:

“The USDA NOP has reviewed the information submitted on this product. The USDA NOP confirms A Bee Organic’s analysis that the TechMek container is allowed for the specific client operation referenced with this inquiry. This USDA NOP decision does not confer approval of the TechMek container in all situations. As a reminder, accredited certifiers have the ability to approve materials per client inquiries per [Policy Memo 11-4](#).”

Based on the recent decision that was issued and Policy Memo 11-4, the USDA NOP requests that A Bee Organic conduct a review of the other paper container materials to determine their compliance on behalf of the client.

Please contact me if you have additional questions.

Kind regards,

*Renée*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312  
Mobile: 202.770.8672  
[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

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---

**From:** Sarah Costin [<mailto:sarah@abeeorganic.com>]  
**Sent:** Monday, March 16, 2015 5:29 PM

**To:** Gebault King, ReneeA - AMS  
**Cc:** Ro Elgas  
**Subject:** RE: TechMek container

Dear Renee,

The client pointed out to me that information on 2 different brand names of paper were submitted, TechMek and Ellegaard. Would you please confirm that the Ellegaard paper container will also be allowed.

Thank you,  
Sarah

Sarah Costin  
Co-Creator/Owner



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[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

---

**From:** Gebault King, ReneeA - AMS [<mailto:ReneeA.GebaultKing@ams.usda.gov>]  
**Sent:** Tuesday, March 10, 2015 6:00 AM  
**To:** Sarah Costin; Ro Elgas  
**Cc:** Courtney, Cheri - AMS; Mann, Renee - AMS  
**Subject:** TechMek container

Dear Sarah and Ro,

Thank you for contacting the USDA National Organic Program (NOP) for clarification regarding the TechMek container with regard to hydroponic production.

The USDA NOP has reviewed the information submitted on this product. The USDA NOP confirms A Bee Organic's analysis that the TechMek container is allowed for the specific client operation referenced with this inquiry. This USDA NOP decision does not confer approval of the TechMek container in all situations.

As a reminder, accredited certifiers have the ability to approve materials per client inquiries per [Policy Memo 11-4](#).

Please contact me if you have additional questions or concerns.

Kind regards,

*Renée*

Renée Gebault King, Ph.D.  
Accreditation Manager



Office: 202.690.1312  
Mobile: 202.770.8672  
[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

USDA National Organic Program  
1400 Independence Ave SW  
Room 2649-South, Stop 0268  
Washington, D.C. 20250-0268  
Main Tel: 202.720.3252  
Fax: 202.205.7808  
[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

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## Schurkamp, Lynnea - AMS

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**From:** Gebault King, ReneeA - AMS  
**Sent:** Tuesday, March 17, 2015 2:47 PM  
**To:** Courtney, Cheri - AMS  
**Subject:** RE: TechMek container

Thanks for reviewing this, Cheri. I'm going to send it off today; I will copy you and RM on the e-mail. RGK

---

**From:** Courtney, Cheri - AMS  
**Sent:** Tuesday, March 17, 2015 2:12 PM  
**To:** Gebault King, ReneeA - AMS  
**Subject:** RE: TechMek container

Looks good.

*Cheri*

---

**From:** Gebault King, ReneeA - AMS  
**Sent:** Tuesday, March 17, 2015 1:35 PM  
**To:** Courtney, Cheri - AMS  
**Subject:** FW: TechMek container

**Cheri- Below is my draft response to Sarah e-mail (e-mail chain below). Thanks for reviewing it. RGK**

Dear Sarah,

Thank you for contacting me with your question.

The USDA National Organic Program (NOP) reviewed the TechMek material based upon the document provided and issued a decision to you on March 10, 2015 as follows:

“The USDA NOP has reviewed the information submitted on this product. The USDA NOP confirms A Bee Organic’s analysis that the TechMek container is allowed for the specific client operation referenced with this inquiry. This USDA NOP decision does not confer approval of the TechMek container in all situations.

As a reminder, accredited certifiers have the ability to approve materials per client inquiries per [Policy Memo 11-4](#).”

Based on the recent decision that was issued and Policy Memo 11-4, the USDA NOP requests that A Bee Organic conduct a review of the other paper container materials to determine their compliance on behalf of the client.

Please contact me if you have additional questions.

Kind regards,

*Renée*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312  
Mobile: 202.770.8672  
[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

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---

**From:** Sarah Costin [<mailto:sarah@abeeorganic.com>]  
**Sent:** Monday, March 16, 2015 5:29 PM  
**To:** Gebault King, ReneeA - AMS  
**Cc:** Ro Elgas  
**Subject:** RE: TechMek container

Dear Renee,

The client pointed out to me that information on 2 different brand names of paper were submitted, TechMek and Ellegaard. Would you please confirm that the Ellegaard paper container will also be allowed.

Thank you,  
Sarah

Sarah Costin  
Co-Creator/Owner



A Bee Organic  
40707 Daily Road  
De Luz, CA 92028  
[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

---

**From:** Gebault King, ReneeA - AMS [<mailto:ReneeA.GebaultKing@ams.usda.gov>]  
**Sent:** Tuesday, March 10, 2015 6:00 AM  
**To:** Sarah Costin; Ro Elgas  
**Cc:** Courtney, Cheri - AMS; Mann, Renee - AMS  
**Subject:** TechMek container

Dear Sarah and Ro,

Thank you for contacting the USDA National Organic Program (NOP) for clarification regarding the TechMek container with regard to hydroponic production.

The USDA NOP has reviewed the information submitted on this product. The USDA NOP confirms A Bee Organic's analysis that the TechMek container is allowed for the specific client operation referenced with this inquiry. This USDA NOP decision does not confer approval of the TechMek container in all situations.

As a reminder, accredited certifiers have the ability to approve materials per client inquiries per [Policy Memo 11-4](#).

Please contact me if you have additional questions or concerns.

Kind regards,

*Renée*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312  
Mobile: 202.770.8672  
[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

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## Schurkamp, Lynnea - AMS

---

**From:** Sarah Costin <sarah@abeeorganic.com>  
**Sent:** Monday, March 16, 2015 5:29 PM  
**To:** Gebault King, ReneeA - AMS  
**Cc:** Ro Elgas  
**Subject:** RE: TechMek container

**Follow Up Flag:** Follow up  
**Due By:** Tuesday, March 17, 2015 4:00 PM  
**Flag Status:** Completed

Dear Renee,

The client pointed out to me that information on 2 different brand names of paper were submitted, TechMek and Ellegaard. Would you please confirm that the Ellegaard paper container will also be allowed.

Thank you,

Sarah

Sarah Costin  
Co-Creator/Owner



A Bee Organic  
40707 Daily Road  
De Luz, CA 92028  
[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

---

**From:** Gebault King, ReneeA - AMS [mailto:ReneeA.GebaultKing@ams.usda.gov]  
**Sent:** Tuesday, March 10, 2015 6:00 AM  
**To:** Sarah Costin; Ro Elgas  
**Cc:** Courtney, Cheri - AMS; Mann, Renee - AMS  
**Subject:** TechMek container

Dear Sarah and Ro,

Thank you for contacting the USDA National Organic Program (NOP) for clarification regarding the TechMek container with regard to hydroponic production.

The USDA NOP has reviewed the information submitted on this product. The USDA NOP confirms A Bee Organic's analysis that the TechMek container is allowed for the specific client operation referenced with this inquiry. This USDA NOP decision does not confer approval of the TechMek container in all situations.

As a reminder, accredited certifiers have the ability to approve materials per client inquiries per [Policy Memo 11-4](#).

Please contact me if you have additional questions or concerns.

Kind regards,

Renée

Renée Gebault King, Ph.D.

Accreditation Manager

Office: 202.690.1312

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## Schurkamp, Lynnea - AMS

---

**From:** Nune Darbinjan (b) (6) @yahoo.com>  
**Sent:** Monday, May 16, 2016 9:09 AM  
**To:** Crail, Lars - AMS  
**Cc:** Yang, RobertH - AMS  
**Subject:** Re: Two quick questions

Dear Lars,

thank you. I am afraid that the e-mail is not working properly and he for some reason does not get my messages. Hopefully he will get them now. Sorry, for interruption.

*Best regards, Ms. Nune Darbinyan  
Liebe Grüße, Frau Nune Darbinyan*

**Dr. Nune Darbinyan**  
**General Director**  
**ECOGLOBE**

---

**Contact information:**

Tel: +37410221295  
Tel mob: +37491418311  
Fax: +37410221295  
E-mail: nd@ecoglobe.am  
(b) (6) @yahoo.com  
**Internet: [www.ecoglobe.am](http://www.ecoglobe.am)**

***Organic certification worldwide USA, Canada, EU, Switzerland  
EU and Swiss code is BIO-112***

***Mind about environment before printing!***

---

**From:** "Crail, Lars - AMS" <Lars.Crail@ams.usda.gov>  
**To:** Nune Darbinjan (b) (6) @yahoo.com>  
**Cc:** "Yang, RobertH - AMS" <RobertH.Yang@ams.usda.gov>  
**Sent:** Monday, May 16, 2016 5:02 PM  
**Subject:** RE: Two quick questions

Hi Nune,

Thanks for contacting me; however, your questions are best answered by your accreditation manager which I am copying.

Best Regards,

Lars Crail

USDA NOP  
202.205.5536 office  
202.631.2105 mobile

-----Original Message-----

From: Nune Darbinyan [mailto:(b) (6)@yahoo.com]  
Sent: Friday, May 13, 2016 10:56 PM  
To: Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>  
Subject: Two quick questions

Dear Lars,

My questions are below. Thank you for taking a minute and responding:

a. Can we accept aquaponics? And if yes, do we apply crop production rules and livestock? Or crop is enough, since their main product for market most probably is crop? No aquaculture rules in NOP yet, right?

And

b. If we certify NOP in Russia, can they sell product as organic to India? Can it be traded under agreement between USA and India?

Nune Darbinyan

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## Schurkamp, Lynnea - AMS

---

**From:** Mann, Renee - AMS on behalf of AMS - AIAinbox  
**Sent:** Tuesday, March 22, 2016 8:34 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** FW: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

---

**From:** Betty Kananen [mailto:[goaorg@centurylink.net](mailto:goaorg@centurylink.net)]  
**Sent:** Friday, March 18, 2016 6:43 AM  
**To:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Global Organic alliance, Inc has not certified any entities for hydroponic, aquaponics, aeroponic in 2015.

Sincerely,

Betty Kananen  
President/CEO  
Global Organic Alliance  
[goaorg@centurylink.net](mailto:goaorg@centurylink.net)  
Facebook: [www.facebook.com/goainc](http://www.facebook.com/goainc)  
Phone – 937.593.1232  
Fax – 937.593.9507

---

**From:** Baron , Anne - AMS [mailto:[AnneP.Baron@ams.usda.gov](mailto:AnneP.Baron@ams.usda.gov)] **On Behalf Of** AMS - AIAinbox  
**Sent:** Wednesday, March 16, 2016 3:30 PM  
**To:** AMS - AIAinbox  
**Subject:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

\*\*\*Original Message\*\*\*

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

---

**From:** Dave Engel <dave@naturesinternational.com>  
**Sent:** Sunday, March 13, 2016 10:22 AM  
**To:** McElroy, Bridget - AMS  
**Cc:** Chris Fanta; Courtney, Cheri - AMS; Baron, Anne - AMS  
**Subject:** Subject: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

---

Bridget,

A somewhat belated response, but better a bit late than never, in this situation....I sense. These are viable, organic production systems. We should not have our heads in the ground (only!) like ostriches, re: accepting them for organic certification. I hope the nop and the task force can bring some balance and way forward to this discussion. Good luck.

Thank you.

Dave

David J. Engel, ED  
Nature's International Certification Services LLC  
608-632-1226

*"In Nature there is abundance, with Nature there is success"*

### **Questions for Certifying Agents:**

*Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?*

**Yes.**

*If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?*

**One. In the past we also have had a few at any given time. And there are always periodic inquiries/interest.**

*In what state or country (if international) are the certified operations located (list)?*

**Three in wisconsin, two in texas, to date.**

*What crops do these certified operations produce (list)?*

**Variety of vegetables and herbs.**

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

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- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

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If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,

Cheri Courtney

Director, Accreditation and International Activities Division

## Schurkamp, Lynnea - AMS

---

**From:** BONNET Aude <aude.bonnet@ecocert.com>  
**Sent:** Tuesday, March 01, 2016 11:48 AM  
**To:** McElroy, Bridget - AMS  
**Cc:** Yang, RobertH - AMS  
**Subject:** TR: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget,  
Please find Ecocert SA reply below following Cheri's email.

Bien cordialement,  
Kind regards,



**Aude BONNET**

*Scheme Manager Organic Agriculture*

[Ecocert SA - BP 47 - 32600 - L'Isle-Jourdain - France]  
T [+33 (0) 5 62 07 52 06] – M [+33 (0) 6 88 20 88 56] - F [+33 (0) 5 62 07 66 19]  
[aude.bonnet@ecocert.com](mailto:aude.bonnet@ecocert.com)  
[www.ecocert.com](http://www.ecocert.com)

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2016** FELICES FIESTAS  
FELICE ANNO NUOVO  
أجمل التمنيات

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BOAS FESTAS GELE MAI FRUMOASE  
SEASON'S GREETING  
明けましておめでとうございます  
2016 YENI YILINIZ KUTLU OLU  
MIRARY SOA नया साल मुबारक  
NAJLEPŠE ŽELJE MANIGONG BAGONG

---

**De :** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **De la part de** AMS - AIAinbox

**Envoyé :** mardi 1 mars 2016 16:12

**À :** AMS - AIAinbox

**Cc :** admin@abeeorganic.com; sarah@abeeorganic.com; ro@abeeorganic.com; info@ascorganic.com; Kat@ascorganic.com; mfigueiras@argencert.com.ar; americert@gmail.com; americert@gmail.com; organic@ausmeat.com.au; info@argencert.com.ar; lmontenegro@argencert.com.ar; jorge.larranaga@aco.net.au; organic@ausqual.com.au; elise@ausqual.com.au; dcox@baystateorganic.org; michael.baker@aco.net.au; michael.baker@aco.net.au; roxana.priego@biolatina.com.pe; baystateorganic@earthlink.net; Koble, Clinton - FSA, Reno, NV ; emel.erkan@bio-inspecta.com; central@biolatina.com; baystateorganic@earthlink.net;

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**Objet :** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **NO**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **0**

In what state or country (if international) are the certified operations located (list)? **/**

What crops do these certified operations produce (list)? **/**

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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STOP 0202-Room 3943-S  
1400 Independence Avenue, SW.  
Washington, DC 20250-0202

February 15, 2017

In reply, please refer to  
2016-AMS-05787-F

Jason Cole  
Research Associate  
The Cornucopia Institute  
P.O. Box 126  
Cornucopia, Wisconsin

Dear Mr. Cole:

This is an interim response to the above referenced FOIA request which sought “all correspondence between the National Organic Program and accredited organic certifiers that discusses or describes hydroponics, aquaponics, bioponics, ponics or container growing.”

A search was conducted within the Accreditation and International Activities Division of the National Organic Program, Agricultural Marketing Service. This search resulted in the identification of 88 pages of responsive records. Within this record set, 18 pages were partially redacted pursuant to exemptions (b)(4), (b)(6) and (b)(7)(c) and (d).

The following information provides the basis for our withholding under the applicable FOIA exemption:

Trade Secrets, Commercial and Financial Information, and Confidential Information – Exemption 5 U.S.C. §552(b)(4)

Exemption (b)(4) of the FOIA protects “trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential” (5 U.S.C. §552(b)(4) (2006), amended by the OPEN Government Act of 2007, Pub. L. No. 100-175, 121 Stat. 2524). This exemption is intended to protect the interests of both the government and submitters of information [See, e.g., Nat’l Parks & Conservation Ass’n v. Morton, 498 F. 2d 765, 767-70 (D.C. Cir. 1974) (concluding that the legislative history of the FOIA “firmly supports an inference that Exemption (b)(4) is intended for the benefit of persons who supply information as well as the agencies which collect it”)]. The information AMS is withholding consists of confidential business information such as product names and a certifier’s proposed solution for a policy issue.

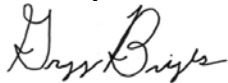
Personal Privacy Interests – Exemption 5 U.S.C. §552(b)(6)

Exemption (b)(6) of the FOIA permits the government to withhold information regarding individuals in “personnel and medical files and similar files” when the disclosure of such information “would constitute a clearly unwarranted invasion of personal privacy” and where such privacy interests outweigh any public interest which would be advanced by the disclosure of their contact information. As a threshold matter, Exemption (b)(6) protects not only personnel files and medical files, but “similar” files, which are interpreted by courts to cover personal information pertaining to individuals. Within this record set, AMS is withholding personal email addresses, cell phone numbers, signatures, and an inspector’s name.

Records or Information Compiled for Law Enforcement Purposes – Exemption 5 U.S.C. §552(b)(7)  
Exemption (b)(7) of the FOIA protects from disclosure “records or information compiled for law enforcement purposes, but only to the extent that the production of such law enforcement records: (A) could reasonably be expected to interfere with law enforcement proceedings; (B) would deprive a person of a right to a fair trial or an impartial adjudication; (C) could reasonably be expected to constitute an unwarranted invasion of personal privacy; (D) could reasonably be expected to disclose the identity of a confidential source, including a State, local, or foreign agency or authority or any private institution which furnished information on a confidential basis, and, in the case of a record or information compiled by a criminal law enforcement authority in the course of a criminal investigation, or by an agency conducting a lawful national security intelligence investigation, information furnished by a confidential source; (E) would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of law; or (F) could reasonably be expected to endanger the life or physical safety of any individual. Within this record set, AMS is withholding an inspector’s name pursuant to sections (c) and (d).

We will continue to process your request. You can expect to receive our next response no later than March 13, 2017.

Sincerely,



Gregory Bridges  
FOIA Officer  
USDA, Agricultural Marketing Service



## Application for Organic Certification

<b>SECTION 1: General Information</b>				<b>CFR 7 §205.201 and §205.401</b>	
Name of Operation: <b>ELLIOTT GARDENS</b>				Client ID # <b>(b)</b>	
Authorized Representative: <b>BRETT ELLIOTT</b>				Date rec'd : <b>6/13/14</b>	
Mailing Address: <b>6321 LOWELL BLVD.</b>		Phone: <b>(b) (6)</b>		Review date : <b>6/17/14</b>	
		E-mail <b>(b) (6)</b>		App Reviewer: <b>SC</b>	
City : <b>DENVER</b>	State/province: <b>CO.</b>	Postal/zip code: <b>80221</b>	Country: <b>USA</b>	Fees rec'd: <b>\$500</b>	
				Inspector: <b>SC</b>	
Primary Contact : <b>BRETT ELLIOTT</b>				Phone: <b>(b) (6)</b>	
				E-mail <b>(b) (6)</b>	
Position or relationship to operation: <b>GROWER</b>					
Legal status: <input checked="" type="checkbox"/> Sole proprietorship <input type="checkbox"/> Corporation <input type="checkbox"/> Cooperative <input type="checkbox"/> Trust or non-profit <input type="checkbox"/> Legal partnership (federal form 1065) <input type="checkbox"/> Other (specify)					
Year company began: <b>1963</b>	Number of employees: <b>8</b>	Name of person overseeing organic production: <b>BRETT ELLIOTT</b>		Government permits/licenses:	
Do you have a copy of current USDA NOP organic standards? <span style="float: right;"><input checked="" type="checkbox"/> Yes   <input type="checkbox"/> No</span>					
If no, contact A Bee Organic					
Please describe your procedures should you not understand a part of the organic standards:					
Does a State Organic Program apply to your operation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If yes, State: Date of Application:		Registration #: Expiration Date:	
Export to: <input type="checkbox"/> Canada <input type="checkbox"/> EU <input type="checkbox"/> Switzerland <input type="checkbox"/> Japan <input type="checkbox"/> Taiwan <input type="checkbox"/> Korea <input type="checkbox"/> Other:					
Does your operation's projected gross agricultural income from organic sales total \$5,000 or less annually? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
If yes, do you intend to sell your products to anyone that will resell them as "organic" or use as an ingredient in an "organic" product? <input type="checkbox"/> Yes <input type="checkbox"/> No					
If you answered "Yes" to the first question and "No" to the second, you may be considered an exempt operation. Please contact A Bee Organic before continuing.					
<b>SECTION 2: Site Information</b>					
<b>OVERVIEW OF OPERATION:</b> Please provide a brief description of your organic production and/or handling:					
<b>Complete and attach the <u>Product List Form</u>. Include all products requested for organic certification.</b>					
<b>Site ID</b>	<b>Site Address</b>	<b>City</b>	<b>State</b>	<b>Zip</b>	<b>Country</b>
<b>ELLIOTT WEST RANGE</b>	<b>6321 LOWELL BLVD.</b>	<b>DENVER</b>	<b>CO.</b>	<b>80221</b>	<b>USA</b>
Attach additional sites as necessary					
Give directions to the site(s) from the nearest main highway: <b>I-76 / FEDERAL / NORTH ON FEDERAL BLVD. TO 64<sup>TH</sup> AVE/ WEST ON 64<sup>TH</sup> AVE. TO LOWELL BLVD./ SOUTH ON LOWELL BLVD. TO 6321 LOWELL BLVD.</b>					
Are you a split operation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Do you have parallel production? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Estimated annual total production <b>50% organic   50% non-organic</b>	
<b>If you are a split operation, attach a list of the general categories of your <u>non-organic</u> products</b>					
<b>SECTION 3: Prior Organic Certification and/or Noncompliance</b>				<b>205.405 (e)</b>	



Has certification ever been denied, suspended, or revoked?  Yes  No

If yes, describe the circumstances: **WE UNKNOWNLY RECEIVED NON ORGANIC PRODUCT FROM AN OUTSIDE GROWER AND RE-PACKED AS ORGANIC.**

Are you currently certified organic with another certifier?  Yes  No

**Attach a copy of each current certificate.**

Have you previously been certified organic with another certifier?  Yes  No

**Attach a copy of your most current certificate**

List all noncompliance from your last certification and state how the noncompliance has been addressed.  No noncompliance

**Attach documentation to provide proof that noncompliance has been addressed.**

**SECTION 4: Affirmation**

**CFR 7 205.100, 205.400 and 205.401**

**4.1:** I affirm that all statements made are accurate. I agree to comply with the Organic Foods Production Act of 1990 and National Organic Program Rules and Regulations. I understand that any part of the certified operation may be subject to unannounced inspection and/or organic products and agricultural inputs used in organic production may be sampled and tested for residues at any time. I will immediately notify the certifying agent of the application, including drift, of a prohibited substance to any part or product of the operation. I agree that any changes to this plan, or to any portion of the certified operation that may affect compliance, will be discussed with the certifying agent prior to implementation. I agree to provide further information as required by the certifying agent. I have read the A Bee Organic Fee Schedule and agree to pay in full any fees incurred during the certification process.

Signature of Owner/Authorized Representative

Date

**(b) (6)**

Name of Owner /Authorized Representative (Print or Type)

I have attached the following documents:

**4.2A; All applicants must provide:**

- Organic System Plan(s)
- Product List Form
- Site Map and/or Facility Diagram
- Materials Use List
- Labels and/or MSDS for materials
- Sample Recordkeeping

**4.2B: Handlers- Processors**

- Production Flow Diagram
- Pest Management Map
- Product Profile
- Product Formulation Worksheet
- Ingredient Supplier Worksheet
- Product Label Worksheet
- Product Labels
- Residue Test, if applicable

**4.2C: Handlers- Brokers, Distributors, Traders**

- Trader Supplier Worksheet

**4.2D: All Crop Producers:**

- Field History Worksheet
- Seed Source Worksheet
- Non-GMO Documentation
- Compost Worksheet, if applicable
- Water Test, if applicable

**4.2E: Greenhouse/Container Crop Production:**

- Greenhouse/Container Worksheet

**4.2F: Hydroponic/Aquaponic Crop Production:**

- Hydroponic/Aquaponic Worksheet

**4.2G: Fungi/Mushroom Production:**

- Fungi/Mushroom Worksheet

**4.2H: Livestock Producers:**

- Livestock Origin/ID Worksheet
- Livestock Health Worksheet
- Livestock Feed Worksheet
- Livestock Supplements & Additives Worksheet, if applicable
- Livestock Feed Formulation Worksheet, if applicable
- Non-GMO Documentation
- Livestock Outdoor Access Worksheet
- Field History Worksheet
- Seed Source Worksheet, if applicable

**4.2J: Ruminant Livestock**

- Ruminant DMI Worksheet
- Ruminant Pasture Worksheet

I have made copies of my Application, Organic Systems Plan and other supporting documents for my records.

**Submit completed forms, fees, and supporting documents to: [admin@abeeorganic.com](mailto:admin@abeeorganic.com)**

**Hard copies may be mailed to:**

**A Bee Organic**

**40707 Daily Rd. Fallbrook CA 92028**



40707 Daily Road, De Luz, CA 92028 USA

National Organic Program  
Accreditation and International Activities Division  
Ms. Cheri Courtney, Director  
1400 Independence Avenue, SW  
Room 2648-South, Stop 0268  
Washington, D.C. 20250-0268

December 1, 2014

Dear Ms. Courtney;

This is the proposal requested in the OASIS decision letter received by A Bee Organic on November 3, 2014.

A Bee Organic has informed all their certified hydroponic and aquaponic growers that OASIS Horticultures and Rootcubes have been classified as “products containing synthetic materials not on the National List” and that they must find alternatives that are either non-synthetic or comply with Section 205.601 of the National List. They have also been informed that at this time there are no synthetics on the list so they must find non-synthetic alternatives.

We asked the growers for feedback on a reasonable timeframe for them to switch over their systems. Growers responded that ideally they would have one year to transition from using OASIS Horticultures and/or Rootcubes to another product for the following reasons:

1. Growers need to identify and test new products through 4 growing seasons: fall, winter, spring & summer. This includes testing different types of seeds, nutrient mixes, pest control- particularly disease control, and computer calibration for several growers.
2. Growers will need to retool automation equipment that is currently designed for OASIS Horticultures and Rootcubes. In several instances this involves close to \$100K of investment. Some growers will need to replace much of their irrigation systems. Others will need to purchase special equipment to form alternative products to fit their system.

A Bee Organic proposes the following transitional steps for growers using OASIS Horticultures and Rootcubes:

1. Growers immediately start tests on alternative products.
2. All tests and results are documented
3. Documented test results are provided to A Bee Organic
4. A Bee Organic reviews test results quarterly
5. Regardless of test results, all growers must transition from OASIS Horticultures and/or Rootcubes to an alternative by December 1, 2015.
6. On December 1, 2015 growers provide a Bee Organic an accounting of OASIS Horticultures and/or Rootcubes and evidence of disposal.
7. A Bee Organic will perform inspections, either scheduled or unannounced, of all growers previously using OASIS Horticultures and/or Rootcubes.
8. Any grower found to still be using OASIS Horticultures and/or Rootcubes will be issued a Notification of Noncompliance with Proposed Suspension.

Please let us know if clarification or additional information is needed.

Respectfully

(b) (6)

Sarah E. J. Costin  
Certification Specialist,  
A Bee Organic

A Bee Organic M001

9178RESC



40707 Daily Road, De Luz, CA 92028 USA

Ms. Cheri Courtney  
Director, Accreditation and International Activities Division  
USDA National Organic Program  
1400 Independence Ave. SW  
Room 2648-S, STOP 0268  
Washington, DC 20250-0268

December 29, 2014

### **Response to A Bee Organic LLC Notice of Noncompliance of September 30, 2014**

**Facts:** A Bee Organic reviewed a certified operation wanting to change certifiers, Elliott Gardens, prior to inspection. A Bee Organic checked for noncompliance with the certifier, found none and accepted the CCOF certificate as valid. A Bee Organic did not check to see if Elliott Gardens was still suspended, making the erroneous assumption that CCOF had done this prior to certifying the site.

#### **Corrective Actions:**

a. Correcting the cause of the noncompliance.

On September 26, 2014 Ro Elgas of A Bee Organic submitted a final letter of request for reinstatement for Elliott Gardens- West Range. Elliott Gardens was reinstated by the Deputy Administrator of NOP on October 16, 2014. A certificate and addendum were reissued to Elliott Gardens-West Range with the Effective Date of October 16, 2014

b. Providing objective evidence supporting how the noncompliance was corrected.

Please see attached letters and revised certificate and addendum for Elliott Gardens- West Range referred to above.

c. Preventing the reoccurrence of the noncompliance in the future.

A Bee Organic policy 1.2 *Acceptance of applicants for certification* states that "A Bee Organic will review for completeness and the ability to comply with 7 CFR Part 205 any person who complies with §§205.400 and 205.401". However, as an additional safeguard, if an applicant states in the space provided on the A Bee Organic application that they have in the past been suspended, the A Bee Organic initial reviewer will check the NOP web site to see if the applicant has been reinstated, whether or not they are currently certified.

d. Providing objective evidence supporting how the noncompliance will be prevented in the future.

The Certification Process Tracker (CPT) has been revised. Line 32 was added to specifically remind the initial reviewer to check prior noncompliance and/or suspension. This was previously a part of the application review on Line 31. The revised CPT is attached.

e. Controlling noncompliant product, when appropriate.

From the time of receipt of "cease and desist" order Elliott Gardens- West Range did not sell any product represented as organic. This will be verified at the next on-site inspection.

Please let us know if further description or documentation is needed. We look forward to verification of the corrective actions effectiveness during A Bee Organic's upcoming onsite accreditation assessment.

Respectfully,

(b) (6)

A large black rectangular redaction box covers the signature area, with the text "(b) (6)" in red at the top left corner.

Sarah Costin  
Administrative Director  
A Bee Organic

Cc: Ro Elgas

Attachments: LTTR A Bee Organic-Elliott Gardens Reinstatement Request2; Elliott Gardens reinstatement letter 101614; Cert-1117-rev-10-16-14; Cert Add1117-rev-10-16-14; CPT revision

## Schurkamp, Lynnea - AMS

---

**From:** Michael Baker <Michael.Baker@aco.net.au>  
**Sent:** Wednesday, March 16, 2016 3:31 PM  
**To:** AMS - AIAinbox  
**Subject:** Automatic reply: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

**Thank you for your email. I am currently out of the office overseas until Wednesday the 23rd of March. I will checking emails intermittently throughout this time.**

**If your enquiry is urgent please contact the ACO office on 0733505706.**

**I will respond to your email upon my return.**

Kind Regards,

Michael Baker (Bach. Ag Sc, MA RD)





## Addendum to Organic Certificate # 141731

Certified Operation: Elliott Gardens- West Range

Address: 6321 Lowell Blvd. Denver CO, 80221

Category: Crop- Hydroponic

Site Address: 6321 Lowell Blvd. Denver CO, 80221

Products Certified: 100% Organic

<u>Products</u>	<u>Variety</u>	<u>ID Mark</u>	<u>Standard</u>	<u>Effective Date</u>
Arugula	Common	Private	NOP	7/16/14
Baby Lettuce	Allstar	Private	NOP	7/16/14
Basil	Dolly	Private	NOP	7/16/14
Chives	Common	Private	NOP	7/16/14
Cucumbers	Assorted	Private	NOP	7/16/14
Dill	Fernleaf	Private	NOP	7/16/14
Eggplant	Assorted	Private	NOP	7/16/14
Kale	Green Curled	Private	NOP	7/16/14
Kale	Lacinato	Private	NOP	7/16/14
Kale	Red Russian	Private	NOP	7/16/14
Mint	Spearmint	Private	NOP	7/16/14
Mizuna	Green	Private	NOP	7/16/14
Oregano	Greek	Private	NOP	7/16/14
Peppers	Assorted	Private	NOP	7/16/14
Rosemary	Upright	Private	NOP	7/16/14
Sage	Common	Private	NOP	7/16/14
Spinach	Tyee	Private	NOP	7/16/14
Squash	Assorted	Private	NOP	7/16/14
Swiss Chard	Green	Private	NOP	7/16/14
Tomato	Assorted	Private	NOP	7/16/14
Tarragon	French	Private	NOP	7/16/14
Thyme	English	Private	NOP	7/16/14

Effective Date: 6/22/14

Date of Issue: 7/16/14

Anniversary Date: 6/22/15

Certification Specialist





## Addendum to Organic Certificate # 141731

Certified Operation: Elliott Gardens- West Range

Address: 6321 Lowell Blvd. Denver CO, 80221

Category: Crop- Hydroponic

Site Address: 6321 Lowell Blvd. Denver CO, 80221

### Products Certified: 100% Organic

Products	Variety	ID Mark	Standard	Effective Date
Arugula	Common	Private	NOP	10/16/14
Baby Lettuce	Allstar	Private	NOP	10/16/14
Living Basil	Dolly	Private	NOP	10/16/14
Chives	Common	Private	NOP	10/16/14
Cucumbers	Assorted	Private	NOP	10/16/14
Dill	Fernleaf	Private	NOP	10/16/14
Eggplant	Assorted	Private	NOP	10/16/14
Kale	Green Curled	Private	NOP	10/16/14
Kale	Lacinato	Private	NOP	10/16/14
Kale	Red Russian	Private	NOP	10/16/14
Living lettuce	Mix	Private	NOP	10/16/14
Mint	Spearmint	Private	NOP	10/16/14
Mizuna	Green	Private	NOP	10/16/14
Oregano	Greek	Private	NOP	10/16/14
Peppers	Assorted	Private	NOP	10/16/14
Rosemary	Upright	Private	NOP	10/16/14
Sage	Common	Private	NOP	10/16/14
Spinach	Tyee	Private	NOP	10/16/14
Squash	Assorted	Private	NOP	10/16/14
Swiss Chard	Green	Private	NOP	10/16/14
Tomato	Assorted	Private	NOP	10/16/14
Tarragon	French	Private	NOP	10/16/14
Thyme	English	Private	NOP	10/16/14

Effective Date: 10/16/14

Date of Issue: 10/16/14

Anniversary Date: 6/22/15

Certification Specialist





## Organic Certificate

Certified Operation: Elliott Gardens -West Range

Address: 6321 Lowell Blvd. Denver CO, 80221

Category: Crop- Hydroponic

Certificate # 141731

Site Address: 6321 Lowell Blvd. Denver CO, 80221

Products Certified: Greens, Herbs and Vegetables (see addendum)

Certified organic under the US National Organic Program 7 CFR Part 205  
Once certified a production or handling operation's organic certification  
continues in effect until surrendered, suspended, or revoked.

Effective Date: 6/22/14

Date of Issue: 7/16/14

Anniversary Date: 6/22/15

  
Certification Specialist





## Organic Certificate

Certified Operation: Elliott Gardens -West Range

Address: 6321 Lowell Blvd. Denver CO, 80221

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Once certified a production or handling operation's organic certification  
continues in effect until surrendered, suspended, or revoked.

Effective Date: 10/16/14

Date of Issue: 10/16/14

Anniversary Date: 6/22/15

*Paul Elgas*  
Certification Specialist



Name of Operation:				Client ID:	
Authorized Representative:		Phone:		Date Application Sent Out :	
Relationship to Operation:		Mobile:		Date Application received :	
		e-mail:		Application Fee received : <input type="checkbox"/> N/A	
Mailing Address 1:		City:		Inspection Fee received:	
Mailing Address 2:		State:		Certification Fee Received:	
Country		Zip/Postal Code:		Additional Fees Received: <input type="checkbox"/> N/A	
Additional Contact: Same as above <input type="checkbox"/>		Phone:		Application Withdrawn: <input type="checkbox"/> N/A	
		Mobile:		Refund <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date:	
		e-mail:			
Site 1 ID:		Site 1 City:		Site 1 Acreage:	
Address		Site 1 State:			
Site 2 ID:		Site 2 City:		Site 2 Acreage:	
Address		Site 2 State:			
Site 3 ID:		Site 3 City:		Site 3 Acreage:	
Address:		Site 3 State:			
Site 4 ID:		Site 4 City:		Site 4 Acreage:	
Address:		Site 4 State:			
Categories of organic products:	<input type="checkbox"/> Crop- Annual or Biennial <input type="checkbox"/> Crop- Perennial: Tree, Vine, Bush, Plant <input type="checkbox"/> Crop- Greenhouse: Terrestrial <input type="checkbox"/> Crop- Greenhouse: Hydroponic <input type="checkbox"/> Crop- Wild crop <input type="checkbox"/> Crop- Fungi <input type="checkbox"/> Handler- Single Ingredient <input type="checkbox"/> Handler- Multiple Ingredient <input type="checkbox"/> Handler- Re-Pack <input type="checkbox"/> Handler- Broker, Trader, Distributor <input type="checkbox"/> Livestock- Ruminant <input type="checkbox"/> Livestock- Non-Ruminant				
Is the operation exempt?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes descr be:	<input type="checkbox"/> Under \$5000 <input type="checkbox"/> Ingredient panel		
If yes, requesting certification?	<input type="checkbox"/> Yes <input type="checkbox"/> No				
Is operation producer group member?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, group name:			
Export requested for: <input type="checkbox"/> N/A	<input type="checkbox"/> Canada <input type="checkbox"/> EU <input type="checkbox"/> Bio-Suisse <input type="checkbox"/> Japan <input type="checkbox"/> Taiwan <input type="checkbox"/> Korea <input type="checkbox"/> Other				
Split Operation?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, was non-organic product list provided?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
Parallel production?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, was non-organic product list provided?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
<b>SECTION A: APPLICATION REVIEW</b>					
Instructions: Review all application materials for completeness and the ability to comply with all applicable NOP regulations. Some applications may need to be reviewed for more than one category and some lines may apply to more than the category they are listed under. Generate inspector instructions. Complete all sections, sign and date, and forward the document to the Inspection Coordinator.					
<b>ALL CATEGORIES</b>	<b>Not Applicable</b>	<b>Received</b>	<b>Complete</b>	<b>Appears to Comply</b>	<b>Notes</b>
Application			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Noncompliance/Suspension	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Organic Systems Plan			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Product List			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Product Profile	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Process Flow Chart	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Site Map and/or Facility Map	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Pest Management	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Non-GMO Documentation	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Commingling Prevention	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Contamination Prevention	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Monitoring			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Equipment	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Cleaning	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Sanitizing	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Storage	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Transportation	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Recordkeeping			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Materials Use Form	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Materials Information	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Prohibited Materials Disclosure	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	



<b>CROP</b>					
Field History Worksheet	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Boundaries and Buffers	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Fertility	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Seed Source Worksheet	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Greenhouse Worksheet	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Mushroom/Fungi Worksheet	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Water & Irrigation	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Compost Log	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Manure Management	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Harvest			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Contractor Information	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>LIVESTOCK</b>					
Livestock Origin/ID Worksheet			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Livestock Health Worksheet			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Livestock Feed Worksheet			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Livestock Supplement/Additive Worksheet	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Livestock Feed Formulation Worksheet	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Livestock Outdoor Access Worksheet			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Ruminant Livestock DMI Worksheet	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Ruminant Livestock Pasture Worksheet	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Pasture Plan	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Manure Management	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>HANDLER</b>					
Product Profiles	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Product Formulation Worksheet	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Ingredient Supplier List	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Product Labels	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Packaging	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Co-Packer Information	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Organic Ingredient Certificates	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>OTHER</b>					
Water Test	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Soil Test	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Residue Test	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Export	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Sample Recordkeeping	<input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Other: State registration			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Other:			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	



1400 Independence Avenue, S.W.  
Room 2648-S, STOP 0268  
Washington, D.C. 20250-0268

VIA EMAIL

Bill Elliot  
Elliot Gardens  
6321 Lowell Blvd.  
Denver, CO 80221

SEP 08 2014

(b) (6)

## NOTICE TO CEASE AND DESIST

Dear Mr. Elliot:

The U.S. Department of Agriculture National Organic Program (NOP) enforces the Organic Foods Production Act of 1990, as amended, and its implementing regulations at 7 CFR 205. All agricultural products sold, labeled or represented as organic must be produced and handled in compliance with the USDA organic regulations. It has come to our attention that Elliot Gardens is selling and representing agricultural products as organic in violation of these regulations.

On July 7, 2010, the Colorado Department of Agriculture suspended Elliot Gardens' organic certification. The NOP has not granted reinstatement of Elliot Gardens' organic certification, which is required by the USDA organic regulations<sup>1</sup> if Elliot Gardens wishes to resume producing or handling agricultural products intended to be sold, labeled or represented as organic. Nonetheless, the NOP has determined that since its suspension, Elliot Gardens has continued to produce agricultural products represented as organic under certification from both the California Certified Organic Farmers and A Bee Organic. Because the NOP has not reinstated the certification of Elliot Gardens, these two certifications are invalid.

Be advised that failure to **cease and desist** selling, labeling or representing agricultural products as organic and otherwise to comply with the USDA organic regulations may result in a civil penalty of \$11,000 per violation. Please notify the NOP in writing of your plan to come into compliance with the regulations or of your intent to appeal this Notice. Please notify Renee Gebault King, Accreditation Manager, at [ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov). If you have questions, Ms. Gebault King can be reached at (202) 720-3252 or via email.

You may appeal the noncompliance decision within 30 days of receipt of this notice, pursuant to §205.681(c) of the USDA organic regulations. Appeals must be filed in writing to:

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<sup>1</sup> See 7 CFR 205.662(f)(1).



Mr. Elliot

Page 2

Administrator, USDA, AMS  
c/o NOP Appeals Staff  
1400 Independence Avenue, SW  
Room 2095-S, STOP 0203  
Washington, DC 20250

Sincerely,



Cheri Courtney  
Director, Accreditation and International Activities Division  
National Organic Program

cc: CCOF  
A Bee Organic

## Schurkamp, Lynnea - AMS

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**From:** Gebault King, ReneeA - AMS  
**Sent:** Wednesday, October 08, 2014 1:09 PM  
**To:** Ro Elgas; Sarah Costin  
**Cc:** Mann, Renee - AMS; Courtney, Cheri - AMS  
**Subject:** Elliott Gardens reinstatement follow-up

Dear Ro and Sarah,

Thank you for speaking with Cheri and Renee Mann yesterday regarding your concerns about the Elliott Gardens reinstatement request process.

Per the conversation, please providing the following information:

- 1) Please explain how your letter complies with NOP 2605, Reinstating Suspended Operations Instruction ([link](#)). Specifically, we are looking for the information on page 4 of 8 of the Instruction where it requests a letter that affirmatively states "The review found that the OSP adequately addressed the noncompliance(s) that led to the suspension, and complies with the regulations..." Thank you for clarifying that Elliott Gardens complies with the regulations – this statement is clear in your letter, however the previous statement affirmatively clarifying that the previous noncompliance has been addressed is not clear to us.
- 2) Please explain how A Bee Organic confirmed that the previous noncompliance was addressed. How does Elliott Gardens prevent the previous noncompliance from recurring in relation to packaging the product? You can provide this information in an email or separate document, whatever method is easiest for you. Please do not change the inspection report or spend time removing information from your letter requesting reinstatement. Thank you for submitting information on September 26<sup>th</sup> regarding the split operation; this has been helpful in explaining the situation. You stated, "*Elliott Gardens is both a retail nursery establishment and a wholesale organic hydroponic potted herb producer. The greenhouse up front is shared with the nursery. The organic area is divided from the nursery (conventional) by a plastic wall. The areas do not share pumps, fertigation or inputs. No issues of cross contamination was noted at inspection. The Elliot Gardens Nursery area sells the Elliot Gardens herbs that were produced organically as conventional, because they were not sure if the non certified nursery could sell organic herbs. No conventional herbs are grown or sold on the nursery side. Flowers for the nursery are not organic and not started onsite. The flowers are purchased from local growers. Brett did not want the any confusion that might happen from growing non organic plant starts.*"

I look forward to working with you to complete this request.

Kind regards,

*Renée*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312

Mobile: 202.770.8672

[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

USDA National Organic Program  
1400 Independence Ave SW

Room 2647-South, Stop 0268  
Washington, D.C. 20250-0268  
Main Tel: 202.720.3252  
Fax: 202.205.7808  
[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

Subscribe to the USDA's [Organic Insider](#) to receive updates in your e-mail!



1400 Independence Avenue, SW.  
Room 2646-S, STOP 0268  
Washington, DC 20250-0201

**NOTICE OF REINSTATEMENT OF CERTIFIED OPERATION**

OCT 16 2014

Brett Elliott  
Elliott Gardens  
6321 Lowell Blvd.  
Denver, CO 80221

(b) (6)

Dear Mr. Elliott,

The National Organic Program (NOP) has completed its review of your request for reinstatement as a certified organic operation. Pursuant to 7CFR § 205.662 (f)(1) and based on the compliance statement provided by your accredited certifying agent, the National Organic Program, on behalf of the Secretary of Agriculture, reinstates the organic certification of Elliott Gardens as a certified organic operation, effective today.

Your certifier will issue your certificate for the products approved in your organic system plan. Please retain all documents relating to this reinstatement for possible future onsite auditing by NOP representatives.

Sincerely,

A handwritten signature in blue ink, appearing to read "Miles V. McEvoy", with a large, sweeping flourish extending to the right. The signature is written over the typed name and title below it.

Miles V. McEvoy  
Deputy Administrator  
National Organic Program

cc: A Bee Organic LLC

## EXIT INTERVIEW

CFR 7 205.403 (d) "The inspector must conduct an exit interview with an authorized representative of the operation who is knowledgeable about the inspected operation so as to verify the accuracy and completeness of inspection observations and the information gathered during the on-site inspection. The inspector must also address the need for any additional information as well as any issues of concern."	
Name of Applicant Operation: Elliott Gardens	
Name of Representative: Brett Elliott	
<b>NOP REGULATION #</b>	<b>ISSUES OF CONCERN</b>
205.601(j)(6)	Micronutrient use (b)(4) without documented deficiency.
205.206	(b)(4) in storage. Obviously not used recently. Not on Material Use List.
205.103	Receipts for inputs not available.
205.206	Baited traps in use. Bait not on Material Use List (b)(4) on sides of greenhouse.
205.601(j)(2)	(b)(4) It is not clear if this is naturally derived or if a liquid (b)(4) product is used.
<b>ADDITIONAL INFORMATION REQUESTED: Please send to A Bee Organic as soon as possible</b>	
Label proofs prior to printing. Send copies of seed providers certificates	
CFR 7 205.403 (e)(1) "At the time of the inspection, the inspector shall provide the operation's authorized representative with a receipt for any samples taken by the inspector. There shall be no charge to the inspector for the samples taken."	
<b>SAMPLES RECEIVED AT INSPECTION: Inspector- Provide representative with a receipt.</b>	
None.	
The authorized representative attests that he/she is knowledgeable about the inspected organic operation, has responded truthfully, and that the inspector observations are accurate and complete.	
Signature of Authorized Representative	(b)(6)
Date:	6-22-14
Signature of Inspector:	(b)(6), (b)(7)(C), (b)(7)(D)
Date:	6-22-14





## Inspection Report- Crop-Hydroponic/Aquaponic Production

### A BEE ORGANIC USE ONLY

Inspector: (b) (6), (b) (7)(C), (b) (3)  
Date Assigned: 6/13/14  
Date Submitted: 6/24/14

Contact Information: Brett Elliott (b) (6)  
(b) (6)  
Inspection site address: 6321 Lowell Blvd., Denver CO  
Directions to inspection site: From Denver International Airport: Take I-70 W to Exit 271 B, Lowell Blvd. toward Tennyson St. turn R at end of ramp on to Lowell Rd. Go 1.9 miles, across RR tracks and past Lowell Ponds. Elliot Gardens is on the left.

**INSPECTOR:** Complete all information prior to submitting your inspection report. Please complete the two right columns directly below these instructions. Total hours DO NOT include travel time. Please submit an invoice with your completed report.  
A Bee Organic will provide the Applicant with a copy of the report as submitted. **7 CFR §205.403 (e)(2)**

Inspection Date: June 22, 2014 Arrival Time: 10:00 AM Departure Time: 12:50 PM Travel Time: 1 hr. Mileage: NA	Pre- Review Hours: 1.5 Onsite Hours: 2.75 Report Hours: 1 <b>Total Hours: 5.25</b>
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List personnel present at inspection: Brett Elliott, co-owner, organic manager.

**Report Instructions:**

- Complete all specific instructions in all sections and indicate if there are associated attachments.
- Issues of Concern must be listed on the Exit Interview and highlighted in the body of the report. If an Issue of Concern is not listed on the Exit Interview but arises during report writing, please note this in the report.
- List attachments in the area provided at the end of the report.
- Any and all changes to the OSP, related worksheets, certificate and/or addendum, and any other form must be initialed by both the authorized representative present at inspection and the inspector.

If you have questions or concerns, especially safety concerns, please immediately call the office at (760) 731-0155

<i>Verify Applicant information on the Application and on the current Certificate. Note any changes.</i>	Elliott Gardens is currently certified (CCOF) as a group member of Circle Fresh Foods for in ground (pots) tomatoes and cucumbers. There was no noncompliance noted. The A Bee certificate should specify <b>Elliott Gardens- West Range</b> as the East side is the non-organic garden center.
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<i>Verify products to be certified on the current Products List. Note changes on both the Products List and the current Certificate Addendum.</i>	The Product List is accurate. All "assorted" vegetables are being sold as 2" pots. Chard, lettuce, arugula, and spinach are sold as both cut and as 2" pots. List both on the certificate. See changes to the Product List. (Attachment A)
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<i>Verify state organic program registration if applicable.</i>	State Program: N/A <span style="float: right;"><input checked="" type="checkbox"/> Not Applicable</span>	
	Registration #:	Expiration Date:

<i>If California State Organic Program participant, verify title transfer documents</i>	Is state registration # included on title transfer documents? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span> Is wording "organic" or "certified organic present on title transfer documents <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span> Comments:	
---	--	--

<i>Verify Health Department certificates as applicable.</i>	Health Dept.: <span style="float: right;"><input checked="" type="checkbox"/> Not Applicable</span>	
	Certificate #:	Expiration Date:

**Prior Minor Noncompliance and Noncompliance:** Verify that prior minor noncompliance and/or noncompliance listed below have been addressed and implemented in the manner agreed upon by the Applicant and the certifier. Provide a description of your verification procedures and relevant documentation sufficient to allow certification reviewer to make an informed decision.



Use additional sheets as necessary.	
Minor Noncompliance and/or Noncompliance	Description and Comments
	None
<p>Verify all sections of the OSP. Describe your verification procedures. Follow any Specific Instructions listed at the start of sections and provide comments. Comments must include all issues of concern and may include additional observations relevant to the operation. Present all facts involved in issues of concern. All issues of concern must be included on the Exit Interview. You must provide the Applicant, or authorized representative present at inspection with a copy of the Exit Interview at the completion of your inspection.</p> <p style="text-align: right;"><b>7 CFR §205.403</b></p>	
<b>Overview of the Operation</b>	
<p>Elliott Gardens is a family run business started in 1963, with organic started in 2006-ish. At first they just purchased and re-packed organic herbs, then started growing them. The organic site consists of 2 greenhouse joined by a covered passage. There are areas for both recirculating hydroponic plants and potted plants. The pots are watered with a hose and have "drip and drain" nutrient application. Harvest- cutting of greens into plastic bins for bulk sale or bagging of living basil- is done in the organic greenhouse.</p> <p>Elliott Gardens is surrendering their group certification with Circle Fresh because they want a wider market for their products. They aren't producing what Circle Fresh wants to buy.</p>	
<b>SECTION 1: General Information (From Application and Additional Forms) 7 CFR §205.201 and §205.401</b>	
<b>1. SPECIFIC INSTRUCTIONS:</b>	
1.1 Has <b>Application</b> been verified?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Comments: See comments above.	
1.2 Have <b>Category and Scope</b> been verified?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Comments: Greenhouse Crop, hydroponic and in pots, to NOP standard.	
1.3 Has <b>Product List Form</b> been verified?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Comments: See revised copy.	
1.4 Has <b>Crop Map</b> been verified?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Comments:	
1.5 Are directions to the site(s) correct and complete?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If no, provide directions:	
1.6 Have <b>export addendums</b> been verified?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable
Export to: <input type="checkbox"/> Canada <input type="checkbox"/> EU <input type="checkbox"/> Switzerland <input type="checkbox"/> Japan <input type="checkbox"/> Taiwan <input type="checkbox"/> Korea <input type="checkbox"/> Other	
Comments:	
1.7 Is this a split operation?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, was non-organic production inspected?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is there parallel production?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Has list of categories of non-organic products been verified?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were all inputs used in non-organic production included on the <b>Material Use List</b> ?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Comments: All non-organic is flowers and some nursery stock that is purchased elsewhere and sold in the garden center which is not a part of the organic operation. All onsite production is organic.	
<b>SECTION 2: Natural Resources CFR 7 §205.2, §205.200</b>	
<b>2. SPECIFIC INSTRUCTIONS:</b>	
<b>2.1 Biodiversity</b>	
Comments: Biodiversity has not been mapped, but there is acreage around the greenhouses that provides habitat for pollinators, birds, and wildlife. Lowell Ponds wildlife sanctuary is just down the road; there are a lot of birds.	
<b>2.2 Conservation &amp; Protection</b>	
Comments: Hydroponic system conserves water and use of existing structures allows the resources on the	



adjoining acreage to be conserved..	
<b>2.3 Water</b>	
Comments: The water test showed clean, slightly alkaline water.	
<b>2.4 Irrigation</b>	
Comments: Irrigation is recirculating drip hydroponic, drip to waste, and hose.	
<b>2.5 Manure Management</b>	
Comments: NA	
<b>2.6 Waste Management</b>	
Comments: Soil in open flats is dumped into a pile behind the greenhouse, covered with plastic and allowed to mulch. It is currently used for planting non-organic perennials or put on craigslist for free. It	
<b>SECTION 3: Land Requirements</b>	<b>7 CFR §205.202</b>
<b>3. SPECIFIC INSTRUCTIONS:</b>	
<b>3.1 Has Greenhouse Worksheet been verified?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Comments: Verified accurate	
<b>3.2 Boundaries and Adjacent Activities</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were all boundaries and adjacent land activities verified? Comments: The OSP descriptions are accurate. There do not appear to be any contamination issues from outside activities. We discussed the possibility of contamination from humans crossing into the organic area from the garden center. Disease would be the issue. Footbath mats with Oxidate are at the entrances to each organic area and there is a low fence between the garden center and the adjacent organic area, but a person could just walk in and avoid the footbath. Brett was aware of this possibility, however remote, and is addressing it.	
<b>3.3 Buffer Zones and Crops</b>	<input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Yes <input type="checkbox"/> No
Were buffer zones and disposal of buffer crops verified? Comments:	
<b>3.5 Map</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were drainage, prevailing winds and other map topography verified? Comments: The greenhouses sit at the top of a rise. Drainage moves towards Lowell Ponds. There is enough distance that this would not be an issue even if there was a spillage in the greenhouse.	
<b>3.6 Soil Mixes</b>	<input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If soil mixes were used, were they included on the <b>Material Use List</b> ? Comments: (b) (4) OMRI listed (b) (4). OMRI listed (b) (4) are also ground up for the potted plants.	
<b>SECTION 4 Fertility and Crop Nutrient Management</b>	<b>7 CFR §205.203</b>
<b>4. SPECIFIC INSTRUCTIONS:</b>	
<b>4.1 Were plant nutrient deficiencies present?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Comments: The fully mature basil was showing some yellowing because it uses more iron than what is being given, but it did not appear "unhealthy".	
<b>4.2 Crop Nutrients/ Amendments</b>	<input type="checkbox"/> Not Applicable <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did you verify that all crop nutrients and/or amendments and manufacturer/suppliers are listed on the <b>Materials Use List</b> ? Comments: There was one (b) (4) in the storage area that was not listed. The container was dusty and Brett said that he had not used it for a while- he thought last on the cucumbers. This product is (b) (4) and does not state narrow range oil on the label, nor was it used in compliance with the narrow range oil restrictions. See Exit Interview. (b) (4). It is unclear if this is a naturally derived product or if liquid (b) (4) products are in use. Information was requested. See Exit interview.	



<b>4.4 Micronutrients</b> Did you review tissue analyses for crops using micronutrients? Comments: There is no leaf analyses or other documentation of deficiency. We discussed the regulation and Brett will be coming up with a plan and sending it to A Bee. <a href="#">See Exit Interview</a> . Did leaf analyses show necessity for use of micronutrients? <a href="#">See Exit Interview</a>	<input type="checkbox"/> Not Applicable <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>4.5 Raw Manure</b> If raw manure was used, were application dates verified? Comments:	<input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>4.6 Compost</b> Did you verify composting practices and procedures, including temperatures and turning? Comments:	<input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>4.7 Sewage Sludge/Bio-solids</b> Was there evidence of use of sewage sludge/biosolids? Comments:	<input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>4.8 Treated Lumber</b> Was lumber treated with prohibited substances used in a manner that might contaminate organic product or soil? <input type="checkbox"/> Yes <input type="checkbox"/> No Comments: Channels are plastic. Support frames are metal.	<input checked="" type="checkbox"/> Not Applicable
<b>SECTION 5: Seeds and Planting Stock</b>	<b>7 CFR 205.204</b>
<b>5. SPECIFIC INSTRUCTIONS:</b>	
<b>5.1 A Seed sourcing</b> Has the <b>Seed Source Worksheet</b> been verified? Comments: If non-organic seed was purchased, describe seed sourcing attempts and documentation Comments: All organic basil seeds were purchased from (b) (4). The seed sourcing procedure if organic seed could not be found was discussed. <a href="#">Send links to seed source web sites</a> . Sent 6/24/14.	<input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>5.1 B Treated Seed/Inoculants</b> If treated seeds and/or inoculants were used, were they included on the <b>Material Use List</b> ? Comments: Inoculants are OMRI listed: (b) (4)	<input type="checkbox"/> Not Applicable <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>5.1 C Sprouts</b> If certified product is sprouts, are organic seeds used? Comments:	<input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>5.2 Seedlings</b> If seedlings are used, was documentation of organic certification verified? Comments: Brett grows his own seedlings. If he buys from an organic producer he will obtain the certificate.	<input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>5.3 Planting Stock</b> If non-organic planting stock was purchased, were planting dates verified?: Comments:	<input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>5.4 Fungi/Mushrooms</b> If fungi/mushrooms are grown, was the <b>Fungi/Mushroom Worksheet</b> verified? Comments:	<input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>SECTION 6: Crop Rotation</b>	<b>7 CFR §205.205</b>

**6. SPECIFIC INSTRUCTIONS:**

6.1 Were crop rotations included in the OSP as a part of pest management?  Yes  No

Comments: Plants are moved around during successive plantings so that the same potted plants are placed in different areas. This helps prevent diseases.

Was actual crop rotation the same as described in the OSP?  Yes  No

Comments: NA

**SECTION 7: Crop Pest, Weed, and Disease Management**

**7 CFR §205.206**

**7. SPECIFIC INSTRUCTIONS:**

**7.1 Pests**

Are there problem pests?  Yes  No

Comments: Aphids and thrips are pests on larger vegetable plants. Rodents may be a problem in winter and spring. There are mechanical traps (17) and baited traps (2) serviced by a PCO.

The baited traps are at the front of the garden center area. The bait is not listed on the MUL and there is pest (b) (4) along the sides and at back of the greenhouses. See Exit Interview.

**7.2 Weeds**

Are there problem weeds?  Yes  No

Comments: Weeds grow along the edges of the greenhouses. They are managed by hand pulling.

**7.3 Diseases**

Are there problem diseases?  Yes  No

Comments: None. They are not selling impatiens in the garden center this year because most of the plants are carrying powdery mildew. See comments in 3.2 about footbath mats.

**7.4 Hierarchy and Inputs**

Is the pest control hierarchy followed prior to use of inputs?  Yes  No

Comments: See comments in 7.1 See attached photos. (Attachments B1 – B2)

Are all input used for pest management included on the **Materials Use List**?  Yes  No

Comments: Rodent bait is not on the list.

**SECTION 8: Organic Integrity**

**7 CFR §205.20**

**8. SPECIFIC INSTRUCTIONS:**

8.1 Was the Equipment List verified?  Yes  No

Comments: Containers are listed in Section 8.3. All equipment is dedicated organic.

**8.2 Contracted Harvest**

Not applicable

Was documentation from contracted harvesters verified?

Yes  No

Comments:

**8.3 Containers**

Not applicable

Was harvest container cleaning documentation verified?

Yes  No

Comments: Containers may be re-used if clean, washed if not.

**8.4 Post Harvest Handling**

Not Applicable

Was post-harvest handling as described in the OSP?

Yes  No

Comments:

Are all substances used as cleaners and sanitizers for post-harvest handling included on the **Materials Use List**?

Not Applicable  Yes  No

Are all substances used as boiler chemicals for on farm handling included on the **Materials Use List**?

Not Applicable  Yes  No

Comments:



### 8.5 Packaging

Not Applicable

Was packaging verified as compliant?

Yes  No

Comments: Kroger's and Rocky Mountain Herbs labels were reviewed. They do not make an organic claim. The may request organic labels. There is a "picture tag" label for 2" pots. Old tags show the USDA NOP seal, but do not list a certifier. These labels will not be used. We discussed the necessity for sending in label proofs for approval prior to printing. [See Exit Interview.](#)

Were packaging procedures and practices verified?

Yes  No

Comments: Brett described the procedures, but there was no organic product ready to harvest at time of inspection.

### 8.6 Storage

Were **Organic Products Storage** areas inspected?

Yes  No  Not applicable

Were **Input Storage** areas inspected?

Yes  No  Not applicable

Were **Packaging Storage** areas inspected?

Yes  No  Not applicable

Comments: All storage is as stated in the OSP.

The organic cooler is dedicated storage for organic produce needing refrigeration.

Packaging stored on shelves or pallets in packing area.

Inputs are stored in the greenhouse.

Seeds are stored in a cabinet in the greenhouse during planting time, and in the office during other times to protect from rodents.

### 8.7 Transportation

Were **Organic Products** transportation units inspected?

Yes  No  Not applicable

Comments: Transportation is dedicated organic.

## SECTION 9: Record Keeping

7 CFR 205.103

*Audit traces for crops and their products represented as "organic" must be completed. If more crops than possible to audit during the inspection were present, three random audits must be completed. The inspector should designate crops/products to be audited. Describe the audit traces in the area provided below. If there are issues of concern, attach copies of all relevant documentation.*

### 9. SPECIFIC INSTRUCTIONS:

9.1 Check all records that you verified:

- crop rotation log  field activity log  crop production logs  pest, weed, disease monitoring log  
 compost log  seed sourcing records  receipts for seed, seedlings and/or planting stock purchase  
 organic certificates of suppliers  seed labels  receipts for inputs  equipment cleaning log  
 transport unit inspection/cleaning forms  storage records  harvest records  bills of lading  
 scale tickets  organic certificates  transaction certificates  phytosanitary certificates  customs forms  
 verification of non-GMO status  verification of no sewage sludge usage  verification of no ionizing radiation  
 purchase orders  receiving records  quality test results  sales orders  sales invoices  
 organic product inventory reports  shipping log  shipping summary log  complaint log  other  
[Describe]

Comments: Non-organic harvest records were reviewed for ability to comply. See comments in trace back below.

### 9.2 Lot Numbering System

If a lot numbering system is used, is it consistent with the description in the OSP?

Yes  No

If no explain:

Explain lot numbering system: The lot number consists of the Julian date of the pack.

### 9.3 Trace back

Can the recordkeeping system track the crop and all other inputs through production?

Yes  No

Receipts for inputs were not available at inspection. We discussed why these were needed. Brett will devise a method of keeping them readily available. **See Exit Interview.**

Can the recordkeeping system balance organic crop produced and organic product sales?

Yes  No

Describe the audit traces performed on site:

Comments: Trace of Organic "Dolly" Basil

- Certificate for (b) (4) Seeds- not available at inspection. Verified off site.
- Receipt: (b) (4) Seed; 1 lb. Dolly ORG Basil; Ship date 6/2/14; Order #3823998.306
- Seed Date/Source Log Book: (b) (4)

[Note: (b) (4)

- Harvest: Dolly Basil will not be ready for harvest until the end of July. Sales harvest records for non-organic Living Basil were reviewed for ability to comply. Log lists: Harvest date; Company (buyer); # of Cases (12 ct.); Invoice/Order # (this is not always provided. The date can also be used to trace back).
- Label: Julian date of harvest is on affixed sticker.
- Additional information: Basil is kept at room temperature, so temperatures are not recorded at shipping. Produce that is cooled will have temperature recorded.
- Inputs: The input log shows fill date; type of nutrient; dosage; area of use. Receipts for inputs were not available at inspection.

It appears that the recordkeeping will be sufficient to perform a trace back when plans for recording input receipts and obtaining organic certificates of suppliers are in place.

**The need for records after one quarter of organic production was discussed but not added to the Exit Interview.**

### SECTION 10: Attachments

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Product List Form- revised | <input type="checkbox"/> Residue Test, if applicable            |
| <input type="checkbox"/> Production Flow Diagram               | <input type="checkbox"/> Sample Record keeping                  |
| <input type="checkbox"/> Map                                   | <input type="checkbox"/> Product Profile                        |
| <input type="checkbox"/> Field History Worksheet               | <input type="checkbox"/> Product Label Worksheet, if applicable |
| <input type="checkbox"/> Seed Source Worksheet                 | <input type="checkbox"/> Product Labels, if applicable          |
| <input type="checkbox"/> Non-GMO Documentation                 | <input type="checkbox"/> Other Photos of pest harborage         |
| <input type="checkbox"/> Materials Use List                    | <input type="checkbox"/> Other [Describe]                       |
| <input type="checkbox"/> Labels and/or MSDS for materials used | <input type="checkbox"/> Other [Describe]                       |
| <input type="checkbox"/> Prohibited Materials Disclosure       | <input type="checkbox"/> Other [Describe]                       |
| <input type="checkbox"/> Pest Management Map                   | <input type="checkbox"/> Other [Describe]                       |
| <input type="checkbox"/> Water Test, if applicable             |   |



**SECTION 14: Affirmation**

I, the Applicant, affirm that I have reviewed this inspection report and accept the inspector's observations. I attest I am knowledgeable of the operation and that all information is true and correct. I have received a copy of the Exit Interview for my records. I understand that all issues of concern noted by the inspector may be reversed or added to by A Bee Organic after review.

\_\_\_\_\_  
Signature of Owner/Authorized Representative

\_\_\_\_\_  
Date

\_\_\_\_\_  
Name of Owner /Authorized Representative (Print or Type)

Under penalty of perjury, I attest that I have reviewed the application, organic systems plan, and supporting documents and have completed an inspection of the operation, and that all statements made in this Inspection Report are accurate. I affirm that any changes to the Organic System Plan and/or related worksheets and other documents were made by the Applicant. I agree to provide clarification of information contained in this report and its attachments as required by the certifying agent. I understand that if I fraudulently misrepresent information, or violate the terms and conditions of the Inspector Contract, I am liable for all damages determined by a court of law. I further indemnify and hold harmless A Bee Organic, its agents and all others from liability for mistakes I knowingly commit. In addition, I attest to the following:

- Neither I nor my immediate family members are currently providing consulting services or in any way involved commercially with this operation.
- I attest that I have not accepted payment, gifts, or favors of any kind from the inspected operation.
- I understand that I am required to submit my inspection report to A Bee Organic within 5 working days of inspection unless approved by A Bee Organic or my inspection fee may be subject to a delay of up to 30 days.

(b) (6), (b) (7)(C), (b) (7)(D)

\_\_\_\_\_  
June 22, 2014

\_\_\_\_\_  
Date

(b) (6), (b) (7)(C), (b) (7)(D)

\_\_\_\_\_  
Name of Inspector (Print or Type)

**Submit completed inspection report and supporting documents to:**

**A Bee Organic  
40707 Daily Rd.  
De Luz, CA 92028  
admin@abeeorganic.com**

## Schurkamp, Lynnea - AMS

---

**From:** Courtney, Cheri - AMS  
**Sent:** Tuesday, September 16, 2014 12:19 PM  
**To:** Gebault King, ReneeA - AMS  
**Cc:** Mann, Renee - AMS  
**Subject:** FW: 205.662 (f) (1) Request for the reinstatement of Elliot Gardens to organic.  
**Attachments:** Elliot Gardens NOP C & D letter.pdf; LTTR A Bee Organic-Elliot Gardens Reinstatement Request.doc; Request reinstatement letter-9-14.pdf; FORM- IR Greenhouse-1117-14.doc; FORM- EI-1117-14.pdf; A-BEE APPLICATION x.doc; Cert-1117-14.pdf; Cert Add1117-14.pdf

Renee,

Here is the official request for reinstatement from ABee organic. We need to determine if he still selling products as organic. Also we need to finalize the NC for ABee. Did you hear from CCOF?

*Cheri*

---

**From:** Essig, Mario - AMS **On Behalf Of** AMS - AIAinbox  
**Sent:** Monday, September 15, 2014 2:30 PM  
**To:** Courtney, Cheri - AMS; Mann, Renee - AMS  
**Subject:** FW: 205.662 (f) (1) Request for the reinstatement of Elliot Gardens to organic.

Cheri and Renee,

Forwarding the reinstatement request to be assigned. (Please remember to forward the attachments to the assigned AM).

Regards,  
Mario Essig



Mario Essig | Program Support Assistant | National Organic Program  
USDA AMS | 1400 Independence Ave. SW RM 2648-S Washington, DC 20250  
[Mario.Essig@ams.usda.gov](mailto:Mario.Essig@ams.usda.gov)  
Office #: 202.779.9466  
[NOP website](#)

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**From:** Ro Elgas [<mailto:ro@abeeorganic.com>]  
**Sent:** Wednesday, September 10, 2014 1:53 PM  
**To:** AMS - AIAinbox  
**Cc:** [elliottgardens@comcast.net](mailto:elliottgardens@comcast.net)  
**Subject:** 205.662 (f) (1) Request for the reinstatement of Elliot Gardens to organic.

205.662 (f) (1) Request for the reinstatement of Elliot Gardens to organic.

Attached;

- Elliot Gardens NOP C & D Letter
- Letter from A Bee supporting reinstatement.
- A request from Brett Elliot for reinstatement of Elliot Gardens to NOP.
- Copy Inspection Report-Crop
- Copy Exit Interview
- Copy Application for certification.
- Elliot Gardens Certificate Crop and Addendum.

Does Brett Elliot need to file an appeal? If yes, can an appeal be filed alongside a reinstatement request?  
Robert said that reinstatement no longer needs to be a lengthy process? Is there an estimated time?

Best regards,  
Ro Elgas

---

**From:** [ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov) [mailto:[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)]  
**Sent:** Monday, September 8, 2014 2:10 PM  
**To:** [elliottgardens@comcast.net](mailto:elliottgardens@comcast.net)  
**Cc:** [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [jake@ccof.org](mailto:jake@ccof.org)  
**Subject:** Registered: NOP Notice to Cease and Desist



This is a Registered Email® message from **Gebault King ReneeA - AMS**.

---

Dear Mr. Elliott,

It has come to our attention that Elliott Gardens is selling and representing agricultural products as organic in violation of the regulations in 7 CFR 205. Attached is a Notice to Cease and Desist issued by the U.S. Department of Agriculture National Organic Program (NOP). Please consult the attached letter for complete details and instructions pursuant to this notice.

*Renee*

Renée Gebault King  
Accreditation Manager  
USDA, National Organic Program  
1400 Independence Ave., SW  
Room 2647-South, Stop 0268  
Washington, D.C. 20250-0268

Tel: 202.690.1312  
Fax: 202.205.7808  
Main: 202.720.3252  
[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

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## Schurkamp, Lynnea - AMS

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**From:** Essig, Mario - AMS on behalf of AMS - AIAinbox  
**Sent:** Tuesday, December 30, 2014 8:37 AM  
**To:** Mann, Renee - AMS; Courtney, Cheri - AMS  
**Cc:** Gebault King, ReneeA - AMS  
**Subject:** FW: A Bee Organic response to noncompliance  
**Attachments:** ABO Response to Noncompliance-12-29-14.pdf; LTTR A Bee Organic-Elliott Gardens Reinstatement Request2.pdf; Elliott Gardens reinstatement letter 101614.pdf; Cert-1117-rev-10-16-14.pdf; Cert Add1117-rev-10-16-14.pdf; CPT revision.pdf

Hi Cheri, Renee M and Renee GK,

Forwarding a response from ABO.

Regards,  
Mario Essig



Mario Essig | Program Support Assistant | National Organic Program  
USDA AMS | 1400 Independence Ave. SW RM 2648-S Washington, DC 20250  
[Mario.Essig@ams.usda.gov](mailto:Mario.Essig@ams.usda.gov)  
Office #: 202.779.9466  
[NOP website](#)

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**From:** Sarah Costin [mailto:admin@abeeorganic.com]  
**Sent:** Monday, December 29, 2014 7:24 PM  
**To:** AMS - AIAinbox  
**Cc:** Ro Elgas  
**Subject:** A Bee Organic response to noncompliance

Please see attached letter of response to the A Bee Organic Notice of Noncompliance dated September 30, 2014. A Bee Organic received this notice from Renee Gebault King on November 28, 2014.

There are 5 supporting attachments, listed at the close of the attached letter, for a total of 6 attachments to this message.

Best regards,  
Sarah Costin  
Co-Creator/Owner



A Bee Organic

40707 Daily Road  
De Luz, CA 92028  
[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

## Schurkamp, Lynnea - AMS

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**From:** Essig, Mario - AMS on behalf of AMS - AIAinbox  
**Sent:** Tuesday, December 16, 2014 12:24 PM  
**To:** Courtney, Cheri - AMS; Mann, Renee - AMS  
**Subject:** FW: ABO Proposal for phase out of OASIS Horticultures and Rootcultures  
**Attachments:** ABO Proposal for phase out of OASIS.pdf

Hi Cheri & Renee,

Forwarding this message regarding Horticultures and Rootcultures.

Regards,  
Mario Essig



Mario Essig | Program Support Assistant | National Organic Program  
USDA AMS | 1400 Independence Ave. SW RM 2648-S Washington, DC 20250  
[Mario.Essig@ams.usda.gov](mailto:Mario.Essig@ams.usda.gov)  
Office #: 202.779.9466  
[NOP website](#)

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**From:** Sarah Costin [<mailto:sarah@abeeorganic.com>]  
**Sent:** Monday, December 01, 2014 6:01 PM  
**To:** AMS - AIAinbox  
**Cc:** Ro Elgas  
**Subject:** ABO Proposal for phase out of OASIS Horticultures and Rootcultures

Please see the attached A Bee Organic proposal for the phase out of OASIS Horticultures and Rootcultures by certified growers.

Sarah Costin  
Co-Creator/Owner



A Bee Organic  
40707 Daily Road  
De Luz, CA 92028  
[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

## Schurkamp, Lynnea - AMS

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**From:** Brines, Lisa - AMS  
**Sent:** Tuesday, June 24, 2014 10:51 AM  
**To:** Mann, Renee - AMS  
**Cc:** Melvin, Jonathan - AMS  
**Subject:** FW: MI-14-3 Rockwool in Organic Hydroponic Production

**Importance:** High

Hi Renee,

JD drafted text below to send to EcoCert-IMO in response to the rockwool issue, Materials Inquiry 14-3. Since you are the accreditation manager for this certifier, can you forward the text to your contact at EcoCert-ICO for a response? If you have any questions before sending, feel free to check-in with JD directly. Thanks!

Sincerely,

Lisa M. Brines  
USDA-AMS-NOP  
Direct: (202) 821-9683  
[lisa.brines@ams.usda.gov](mailto:lisa.brines@ams.usda.gov)

---

**From:** Melvin, Jonathan - AMS  
**Sent:** Tuesday, June 24, 2014 8:06 AM  
**To:** Brines, Lisa - AMS  
**Subject:** MI-14-3 Rockwool in Organic Hydroponic Production  
**Importance:** High

Dear Lisa,

I have drafted the following based upon a previous inquiry for Renee to send to Ecocert-ICO regarding their approval and allowance of Rockwool in organic hydroponic production. Not sure of the procedure since this is my first...do you approve this then I can forward to Renee (AM for Ecocert) to send or do you forward this? Please let me know I'm willing to do either. Thanks for your help.

J.D.

Jonathan (J.D.) Melvin  
Compliance & Enforcement Division  
USDA-AMS-National Organic Program  
1400 Independence Ave SW; Room 2648  
Phone Number 202-205-7806  
[jonathan.melvin@ams.usda.gov](mailto:jonathan.melvin@ams.usda.gov)  
[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

*Register for the USDA Organic Insider, the National Organic Program's email notification service, by visiting <http://bit.ly/NOPOrganicInsiderRegistration>*

Dear Dave,

This email is a request for additional information in accordance with [NOP Policy Memo 11-4](#), Evaluation of Materials Used in Organic Crop, Livestock, and Handling Operations.

NOP Policy Memo 11-4 provides a process for resolving conflicts in interpretation on the allowance of materials under the USDA organic regulations.

On June 17, 2014, a certifier contacted NOP regarding the use of Rockwool in organic hydroponic production. Specifically, the certifier requested NOP's interpretation on the allowance of Rockwool as an approved growing media in organic hydroponic operations. An operation that was denied the use of Rockwool in its hydroponic operation by its previous certifier was changing certifiers to Ecocert-ICO so that they could use this substance as a growing media for their organic hydroponic production.

In order to resolve this conflict in interpretation on the use of Rockwool in organic hydroponic production, **NOP requests that you provide a brief written summary of any current or previous decisions to approve or deny the use of Rockwool in organic hydroponic production.** The summary should include citations to relevant sections of the USDA organic regulations, as applicable, and indicate whether the Rockwool was previously approved or denied as a synthetic or nonsynthetic substance.

Following receipt, NOP will review the information provided from all parties and determine whether the regulations have been properly applied. NOP's determination will be limited to the application of the USDA organic regulations for generic materials; the NOP does not approve or endorse branded (formulated) input products.

A written response to this inquiry is requested no later than Tuesday, July 15th.

Sincerely,

## Schurkamp, Lynnea - AMS

---

**From:** Mann, Renee - AMS on behalf of AMS - AIAinbox  
**Sent:** Tuesday, March 22, 2016 8:34 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** FW: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

---

**From:** Betty Kananen [mailto:[goaorg@centurylink.net](mailto:goaorg@centurylink.net)]  
**Sent:** Friday, March 18, 2016 6:43 AM  
**To:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Global Organic alliance, Inc has not certified any entities for hydroponic, aquaponics, aeroponic in 2015.

Sincerely,

Betty Kananen  
President/CEO  
Global Organic Alliance  
[goaorg@centurylink.net](mailto:goaorg@centurylink.net)  
Facebook: [www.facebook.com/goainc](http://www.facebook.com/goainc)  
Phone – 937.593.1232  
Fax – 937.593.9507

---

**From:** Baron , Anne - AMS [mailto:[AnneP.Baron@ams.usda.gov](mailto:AnneP.Baron@ams.usda.gov)] **On Behalf Of** AMS - AIAinbox  
**Sent:** Wednesday, March 16, 2016 3:30 PM  
**To:** AMS - AIAinbox  
**Subject:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

\*\*\*Original Message\*\*\*

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

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**From:** Essig, Mario - AMS on behalf of AMS - AIAinbox  
**Sent:** Tuesday, December 02, 2014 7:59 AM  
**To:** Mann, Renee - AMS; Courtney, Cheri - AMS  
**Subject:** FW: ABO Proposal for phase out of OASIS Horticultures and Rootcultures  
**Attachments:** ABO Proposal for phase out of OASIS.pdf

Hi Renee,

What is the proper procedure for this kind of message?

Regards,  
Mario Essig



Mario Essig | Program Support Assistant | National Organic Program  
USDA AMS | 1400 Independence Ave. SW RM 2648-S Washington, DC 20250  
[Mario.Essig@ams.usda.gov](mailto:Mario.Essig@ams.usda.gov)  
Office #: 202.779.9466  
[NOP website](#)

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---

**From:** Sarah Costin [<mailto:sarah@abeeorganic.com>]  
**Sent:** Monday, December 01, 2014 6:01 PM  
**To:** AMS - AIAinbox  
**Cc:** Ro Elgas  
**Subject:** ABO Proposal for phase out of OASIS Horticultures and Rootcultures

Please see the attached A Bee Organic proposal for the phase out of OASIS Horticultures and Rootcultures by certified growers.

Sarah Costin  
Co-Creator/Owner



A Bee Organic  
40707 Daily Road  
De Luz, CA 92028  
[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>



## Schurkamp, Lynnea - AMS

---

**From:** Mann, Renee - AMS  
**Sent:** Tuesday, December 16, 2014 5:59 PM  
**To:** Gebault King, ReneeA - AMS  
**Cc:** Courtney, Cheri - AMS; AMS - AIAinbox  
**Subject:** FW: ABO Proposal for phase out of OASIS Horticultures and Rootcubes  
**Attachments:** ABO Proposal for phase out of OASIS.pdf

Hello Renee GK:

I think this is the same document from A Bee Organic that I forwarded to you – but just in case, I am forwarding it on.

Thanks,  
Renee

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

---

**From:** Essig, Mario - AMS **On Behalf Of** AMS - AIAinbox  
**Sent:** Tuesday, December 16, 2014 12:24 PM  
**To:** Courtney, Cheri - AMS; Mann, Renee - AMS  
**Subject:** FW: ABO Proposal for phase out of OASIS Horticultures and Rootcubes

Hi Cheri & Renee,

Forwarding this message regarding Horticultures and Rootcubes.

Regards,  
Mario Essig



Mario Essig | Program Support Assistant | National Organic Program  
USDA AMS | 1400 Independence Ave. SW RM 2648-S Washington, DC 20250  
[Mario.Essig@ams.usda.gov](mailto:Mario.Essig@ams.usda.gov)  
Office #: 202.779.9466  
[NOP website](#)

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---

**From:** Sarah Costin [<mailto:sarah@abeeorganic.com>]  
**Sent:** Monday, December 01, 2014 6:01 PM  
**To:** AMS - AIAinbox

**Cc:** Ro Elgas

**Subject:** ABO Proposal for phase out of OASIS Horticultures and Rootcubes

Please see the attached A Bee Organic proposal for the phase out of OASIS Horticultures and Rootcubes by certified growers.

Sarah Costin  
Co-Creator/Owner



A Bee Organic  
40707 Daily Road  
De Luz, CA 92028  
[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

## Schurkamp, Lynnea - AMS

---

**From:** Mann, Renee - AMS  
**Sent:** Wednesday, November 12, 2014 5:35 PM  
**To:** Howley, JannaB - AMS  
**Cc:** Courtney, Cheri - AMS; Essig, Mario - AMS  
**Subject:** FW: Horticulture and Rootcubes

Hello Janna:  
Please handle this question from Americert.

Thank you,  
Renee M

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

---

**From:** Essig, Mario - AMS  
**Sent:** Wednesday, November 12, 2014 3:29 PM  
**To:** Courtney, Cheri - AMS; Mann, Renee - AMS  
**Subject:** FW: Horticulture and Rootcubes

Cheri & Renee,

Forwarding the question.

Regards,  
Mario Essig



Mario Essig | Program Support Assistant | National Organic Program  
USDA AMS | 1400 Independence Ave. SW RM 2648-S Washington, DC 20250  
[Mario.Essig@ams.usda.gov](mailto:Mario.Essig@ams.usda.gov)  
Office #: 202.779.9466  
[NOP website](#)

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\*\*\*\*\*

**From:** AmeriCert International [<mailto:americert@gmail.com>]  
**Sent:** Wednesday, November 12, 2014 3:24 PM  
**To:** Essig, Mario - AMS  
**Subject:** Re: Horticulture and Rootcubes

Cheri and Mario,

Can you advise if this was because the material was suffused with synthetic wetting agents/ starter fertilizers or was it because the material itself was synthetic? When we review materials of this type, we verify no wetting agents/synthetic fertilizers but we have not resolved the issue of whether growing media which technically synthetic (i.e. rock wool) is allowed as a soilless media.

Sincerely,  
Jonathan Austin

On Wed, Nov 12, 2014 at 3:08 PM, Essig, Mario - AMS <[Mario.Essig@ams.usda.gov](mailto:Mario.Essig@ams.usda.gov)> wrote:

Dear Accredited Certifiers:

On May 5, 2014, NOP received notification from a certifying agent regarding an alleged difference in interpretation of the use of two growing media products, Horticultures and Rootcultures, for organic hydroponic production. The notice was submitted according to Policy Memo 11-4, which indicates that certifying agents must notify the NOP when a certifying agent concludes that a product may not comply with the regulations, but the product is allowed by another certifying agent.

Upon review of the information provided by both parties, NOP has determined that the USDA organic regulations have been misapplied in approving these growing media products for organic hydroponic production, since these products contain synthetic materials that are not on the National List.

NOP has instructed the certifying agent involved to rescind its approval of these products.

Certifiers and material evaluation programs may need to take steps to ensure that previously-approved growing media products are nonsynthetic or comply with section 205.601 of the National List.

Parties interested in further consideration of synthetic materials for organic hydroponic production may submit a petition to the National Organic Standards Board according to the current National List petition guidelines published in the Federal Register.

*Cheri Courtney*

Director, Accreditation & International Activities Division

National Organic Program

U.S. Department of Agriculture

Room 2648-So. (Stop 0268)

1400 Independence Ave SW

Washington, DC 20250-0268

Phone: [\(202\) 720-8491](tel:(202)720-8491)

[www.ams.usda.gov/NOP](http://www.ams.usda.gov/NOP)

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Americert International  
(formerly known as OIA North America)  
2603 NW 13th St. #228  
Gainesville, FL 32609  
Ph: 352.336.5700  
Fax: 866.325.8261  
[www.americertorganic.com](http://www.americertorganic.com)

## Schurkamp, Lynnea - AMS

---

**From:** Rakola, Betsy - AMS  
**Sent:** Wednesday, May 21, 2014 8:21 AM  
**To:** Mann, Renee - AMS  
**Subject:** Fw: Notification per PM 11-4 Oasis Grower Solutions Growth Media  
**Attachments:** Oasis Grower Solutions growth media.pdf

Hi Renee - it looks like this issue may need to go to the materials evaluation committee to resolve the differing interpretations of A Bee and CCOF. Let me know if there's anything you'd like me to do.

Thanks,

Betsy  
Sent from my Blackberry

---

**From:** Devon Pattillo [mailto:devon@ccof.org]  
**Sent:** Tuesday, May 20, 2014 08:07 PM  
**To:** AMS - Guidance, NOP  
**Cc:** Jake Lewin <Jake@ccof.org>; Rakola, Betsy - AMS  
**Subject:** Notification per PM 11-4 Oasis Grower Solutions Growth Media

Per [NOP Policy Memo 11-4](#), CCOF is providing NOP with this notification.

CCOF differs from A Bee Organic in our evaluation of the product "Horticubes" and "Rootcubes" by Oasis Grower Solutions. See <http://www.oasiseasyhydro.com/oasis-easy-hydro-horticubes-product.asp>. These are growing media products used in hydroponic systems.

CCOF is evaluating hydroponic growing media based on 1) determination of synthetic vs. non-synthetic status, and 2) the potential for uptake and/or translocation of synthetic materials via root-media interaction.

As we understand it, this is a phenolic foam product based on phenol-formaldehyde chemistry with added surfactants, colorants, and catalysts (see attached). Therefore, we find these material to be synthetic and not allowed per the National List. This is based on information provided by the manufacturer about the manufacturing process (attached).

Furthermore, we expect plant roots to permeate the growing media and therefore expect significant root-media interaction (compared to a Styrofoam block used to float plants, for instance). Our evaluation of the of the potential for root-media interactions is supported by evidence presented in the attached document (page 3) disclosing that analysis of plants grown on these products indicate presence of surfactants and sulfonic acids. These are synthetic products involved in the manufacture of the products.

CCOF has not allowed our certified hydroponic operations to use these specific products and have communicated the same position on a number of similar products. We also understand our review practices to be aligned with OMRI's policies and those of other accredited certifiers.

We have communicated in the past with Ron Elgas at A Bee Organic on this issue and he has notified us that they differ from CCOF in our conclusion on this material.

Please let me know if you need anything else from CCOF. We look forward to hearing from you soon.

Regards,

**Devon Pattillo**

Livestock Certification Supervisor & Materials Coordinator  
CCOF

2155 Delaware Ave., Suite 150

Santa Cruz, CA 95060

(831) 423-2263, ext. 39

fax (831) 423-4528

[www.ccof.org](http://www.ccof.org)

Visit CCOF on [Facebook](#) and [Twitter](#)



## Schurkamp, Lynnea - AMS

---

**From:** Rakola, Betsy - AMS  
**Sent:** Friday, August 15, 2014 8:40 AM  
**To:** Mann, Renee - AMS; Courtney, Cheri - AMS  
**Subject:** FW: Notification per PM 11-4 Oasis Grower Solutions Growth Media  
**Attachments:** Fw: Notification per PM 11-4 Oasis Grower Solutions Growth Media

FYI. I don't believe we provided a response to CCOF.

Betsy Rakola

Organic Policy Advisor, USDA Agricultural Marketing Service  
Tel 202-604-5693  
[www.usda.gov/organic](http://www.usda.gov/organic)

---

**From:** Devon Pattillo [mailto:devon@ccof.org]  
**Sent:** Thursday, August 14, 2014 8:04 PM  
**To:** AMS - Guidance, NOP  
**Cc:** Rakola, Betsy - AMS  
**Subject:** RE: Notification per PM 11-4 Oasis Grower Solutions Growth Media

Has NOP had a chance to review this material? I'm a little unclear about your process for communicating the results of the review, and our client continues to ask us about our position.

Thank you,

**Devon Pattillo**  
Livestock & Materials Manager  
CCOF  
2155 Delaware Ave., Suite 150  
Santa Cruz, CA 95060  
(831) 423-2263, ext. 39  
fax (831) 423-4528  
[www.ccof.org](http://www.ccof.org)  
Visit CCOF on [Facebook](#) and [Twitter](#)

*Cost Share - A Refund of Organic Certification Fees! Receive a 75% refund on your certification costs up to \$750. [Apply today.](#)*

---

**From:** Devon Pattillo  
**Sent:** Tuesday, May 20, 2014 5:07 PM  
**To:** 'NOP.Guidance@ams.usda.gov'  
**Cc:** Jake Lewin; 'Rakola, Betsy - AMS'  
**Subject:** Notification per PM 11-4 Oasis Grower Solutions Growth Media

Per [NOP Policy Memo 11-4](#), CCOF is providing NOP with this notification.

CCOF differs from A Bee Organic in our evaluation of the product "Horticubes" and "Rootcubes" by Oasis Grower Solutions. See <http://www.oasiseasyhydro.com/oasis-easy-hydro-horticubes-product.asp>. These are growing media products used in hydroponic systems.

CCOF is evaluating hydroponic growing media based on 1) determination of synthetic vs. non-synthetic status, and 2) the potential for uptake and/or translocation of synthetic materials via root-media interaction.

As we understand it, this is a phenolic foam product based on phenol-formaldehyde chemistry with added surfactants, colorants, and catalysts (see attached). Therefore, we find these material to be synthetic and not allowed per the National List. This is based on information provided by the manufacturer about the manufacturing process (attached).

Furthermore, we expect plant roots to permeate the growing media and therefore expect significant root-media interaction (compared to a Styrofoam block used to float plants, for instance). Our evaluation of the of the potential for root-media interactions is supported by evidence presented in the attached document (page 3) disclosing that analysis of plants grown on these products indicate presence of surfactants and sulfonic acids. These are synthetic products involved in the manufacture of the products.

CCOF has not allowed our certified hydroponic operations to use these specific products and have communicated the same position on a number of similar products. We also understand our review practices to be aligned with OMRI's policies and those of other accredited certifiers.

We have communicated in the past with Ron Elgas at A Bee Organic on this issue and he has notified us that they differ from CCOF in our conclusion on this material.

Please let me know if you need anything else from CCOF. We look forward to hearing from you soon.

Regards,

**Devon Pattillo**

Livestock Certification Supervisor & Materials Coordinator

CCOF

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fax (831) 423-4528

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Visit CCOF on [Facebook](#) and [Twitter](#)

## Schurkamp, Lynnea - AMS

---

**From:** Baron , Anne - AMS on behalf of AMS - AIAinbox  
**Sent:** Tuesday, March 01, 2016 10:12 AM  
**To:** AMS - AIAinbox  
**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division



40707 Daily Road, De Luz, CA 92028 USA

Administrator, USDA, AMS c/o NOP Appeals Staff  
1400 Independence Ave, SW Room 2095-s, STOP 0203  
Washington, DC

9/26/14

To whom it may concern:

A Bee Organic is submitting a formal request by Elliott Gardens- West Range for reinstatement to active USDA Organic certification.

History: Elliott Gardens (previously a certified Handler) was suspended in 2010 for having received, packed and sold non-organic product that was sold as organic. At the time of suspension Elliott Gardens was told that the suspension would last one year, and that after one year the operation could reapply for organic certification. After the year had passed Elliott Gardens applied for organic certification as a part of a crop grower group certified by CCOF. Unknown to A Bee neither Elliott Gardens nor CCOF contacted the Administrator of the USDA, AMS to get the operation properly reinstated.

Current: Before Elliott Gardens withdrew from the grower group they applied for organic certification with A Bee Organic. The suspension was listed on the application, (see attached). The A Bee inspector reviewed the certificate and last letter of certification issued by CCOF for unresolved noncompliance issues. No issues had been cited from last inspection. A Bee found Brett Elliott forthcoming with information and he made no attempt to obscure the suspension from 2010. A Bee Organic inspection found a few issues that were listed on the Exit Interview. The issues were addressed to our satisfaction and a certificate was issued to Elliott Gardens- West Range. The inspection report clarified the question of split operation with the following statement: "The A Bee certificate should specify Elliott Gardens- West Range as the East side is the non-organic garden center."

Elliott Gardens- West Range is not a split operation. There is a retail conventional nursery, Elliott Gardens, on the East side of the land that has been in the family for years and is run by Brett's mother, and then there is Brett's business, Elliott Gardens- West Range that grows organic hydroponic herbs and vegetables. The herbs and some vegetable starts are sold wholesale in 2" pots. The two businesses occupy their own areas and are separated by a plastic wall. There is no parallel production and records are kept separately.

A Bee has determined that the hydroponic crop operation meets the compliance requirements in 7 CFR 205. At this time Elliott Gardens- West Range is seeking reinstatement into USDA Organic Certification. A Bee Organic supports the reinstatement of Elliott Gardens- West Range based on the fact that the operation no longer purchases, or handles any organic product from other growers and that they have been able to operate in compliance as a crop grower for the last couple of years.

Thank you for your time and consideration.

Best regards,  
Ro Leigh Elgas



40707 Daily Road, De Luz, CA 92028 USA

Administrator, USDA, AMS c/o NOP Appeals Staff  
1400 Independence Ave, SW Room 2095-s, STOP 0203  
Washington, DC

9/9/14

To whom it may concern,

A Bee Organic is submitting a formal request by Elliot Gardens for reinstatement to active USDA Organic certification.

Elliot Gardens (certified Handler) was suspended in 2010 for having received, packed and sold non-organic product that was sold as organic. At the time of suspension Elliot Gardens was told that the suspension would last one year, and that after one year the operation could reapply for organic certification.

After the year had passed Elliot Gardens applied for organic certification as a Crop producer as a part of a hydroponic grower group certified by CCOF. Elliot Gardens did not know, and was not told by the new ACA that once suspended they had to reapply with the Administrator of the USDA, AMS.

Elliot Gardens withdrew from the grower group they applied for organic certification with A Bee Organic. On the application they listed the suspension, (see attached). At inspection a certificate issued by CCOF along with the last letter from inspection were reviewed. A Bee found Brett Elliot forthcoming with information and he made no attempt to obscure the suspension from 2010. Because of certification with CCOF A Bee had reason to question further.

At inspection and in review no issues resembling those that triggered the 2010 suspension were noted. A Bee has determined that the hydroponic crop operation is in compliance with NOP rule and issued a certificate. That certificate was declared invalid due to the yet to be resolved suspension issue. At this time Elliot Gardens is seeking reinstatement into USDA Organic Certification.

Thank you for your time and consideration.

Best regards,  
Ro Leigh Elgas

A-7.1

## Specialized media for hydroponics seed germination

A low density, high-drainage foam, OASIS® *Horticulture*® growing medium is specifically engineered for hydroponics seed germination of vegetables and herbs. Growers will appreciate the simplicity this medium brings to the challenges of hydroponics production.

The excellent performance of *Horticulture* medium is based upon its unique cell structure which closely resembles the cellular structure of plants. This growing media is designed to drain off excess water from the base of the seed, allowing an optimal balance of oxygen and water, even when the foam is completely saturated.

*Horticulture* growing medium is sterile upon receipt and provides a clean start, pathogen-free, environment which reduces disease and insect problems for plant germination. All *Horticulture* media is manufactured in a "sheet" style that fits easily on a bench or into industry standard "1020" trays. Each sheet is pre-scored for easy removal of a single cube, block of cubes, or strip of cubes.

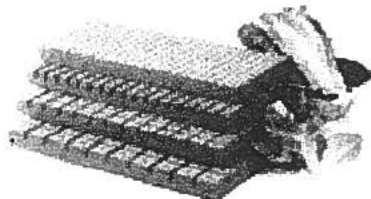


OASIS®  
**HORTICUBE®**  
Growing Medium

## Features and Benefits

From sowing to transplanting, *Horticulture* growing medium makes hydroponics an easy process. Growers benefit from:

- Simple to use – just add water and sow seeds
- High-drainage product characteristic is ideal for crops requiring high water usage
- Specially-engineered balance of water and air promotes vigorous root development
- Consistent product quality cell to cell
- Product cells do not compact after continual watering, maintaining the original air porosity
- Pre-dibbled holes make it easy to set the seed into place in the media
- Sterile sheets reduce disease problems



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 **OASIS**  
GROWER PRODUCTS



A-7.3

## PHENOLIC FOAM FOOD SAFETY STUDY

### EXECUTIVE SUMMARY

Phenolic foam plant growing or growth supporting medium is a synthetic substrate for soilless propagation of vegetative cuttings, raising of seedlings and growth of plants. The Oasis Grower Foam is a porous solid matrix based on phenol-formaldehyde chemistry. The foaming process starts with a liquid phenol-formaldehyde resin, to which a number of proprietary surfactants, colorants, inert ingredients and acid blend catalysts are added to manufacture a solid wettable foam product. Blowing agents are used to further "expand" the foam to produce a physical support structure for growing plants. Depending on the intended usage, the ingredients are added at different proportions to give desired characteristics.

One of the intended uses of the phenolic foam is for starting, supporting and/or growing certain food crops for human consumption such as lettuce, herbs, vegetables, rice, etc. The testing described in this report was commissioned by the Smithers-Oasis Company to evaluate the safety of the phenolic foam products as delivered to the customers (raw foam). This study had three major objectives: 1) determine if common pathogenic bacteria associated with foodborne illness may be present on the raw foam; 2) determine if the phenolic foam products have mutagenic properties that could be transferred to food plants grown on the products; and 3) determine if the foam products contain soluble organic compounds of potential concern related to the manufacturing process that could be translocated into plants grown on the foam.

The results of the tests performed as a part of this safety study are summarized below.

#### **Objective 1: Determine if Common Pathogenic Bacteria are Present in the Raw Foam**

Since the intended use of the phenolic foam products is to germinate/grow certain crops for human consumption, tests were conducted to determine if common bacteria indicative of fecal contamination and known to cause foodborne illnesses (i.e., *Escherichia coli*, *Salmonella* sp. and *Listeria monocytogenes*) may be present in the phenolic foam plant growing or growth supporting products-as manufactured and before being packaged and supplied to the customer.

*Tests conducted on the products indicated that these genera of bacteria were NOT present on the raw foam products immediately after manufacture.*

#### **Objective 2: Determine Potential Mutagenicity of the Products**

Standard protocol Ames Assays were performed on extracts from the phenolic foam plant growing or growth supporting products, and lettuce and rice plants grown on the products to screen for the presence of mutagens.

*The results of the Ames tests were negative, indicating that there are no mutagenic constituents in the phenolic foam products or in plants grown on those products. Since many (but not all)*

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APR 27 2012

BY: .....

A-7.4

*carcinogens are also mutagens, the Ames Assay results provide supporting evidence against the presence of carcinogenic compounds.*

**Objective 3: Determine if Soluble Chemicals of Potential Concern are Present**

The third objective was to determine if potentially toxic soluble chemicals of public health concern might be present in the phenolic foam plant growing or growth supporting products as supplied to the customer. Two screening methods were used to determine if chemicals related to the manufacture of the foam were likely to be present in the final products. Gas Chromatography – Mass Spectroscopy (GC-MS) was used to look for volatile organic compounds; and High Performance Liquid Chromatography (HPLC) was used to look for other compounds that are not readily detected by GC-MS methods. The HPLC method can also reveal the presence of some types of compounds produced by plants growing on the phenolic foam growing medium.

*GC-MS analysis of extracts from three different phenolic foam plant growing or growth supporting products and from lettuce and rice plants grown on those products did not detect the presence of volatile organic compounds of potential concern.*

*HPLC analysis of the phenolic foam plant growing or growth supporting products and from lettuce and rice plants grown on those products indicated the presence of low levels of surfactants and sulfonic acids used in making the products, and natural sugars and related compounds formed by the lettuce and rice plants.*

**Conclusion**

Based on the testing described in this report, it is concluded that when used as intended, the phenolic foam plant growing or growth supporting products do not pose a risk to the people who handle the foam or to people who eat food crops grown on the products.



## Schurkamp, Lynnea - AMS

---

**From:** Brandon Nauman <BNauman@scsglobalservices.com>  
**Sent:** Tuesday, March 01, 2016 10:15 AM  
**To:** AMS - AIAinbox  
**Subject:** Out of Office: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Greetings,

I will be out of the office until Wednesday, March 2. I will have periodic email access and will respond to your inquiry as I am able.

If you need assistance with Organic Certification or Non-GMO Verification, please contact:

Lucy Anderson (LAnderson@scsglobalservices.com)  
Faye Litzinger (FLitzinger@scsglobalservices.com)

For assistance with Food Testing:

Danny Diaz (DDiaz@scsglobalservices.com)

I will respond to all nonurgent inquiries when I'm back in the office on Wednesday.

Regards,

Brandon

## Schurkamp, Lynnea - AMS

---

**From:** Hartley, Julie - AMS  
**Sent:** Wednesday, May 29, 2013 1:25 PM  
**To:** Crail, Lars - AMS; Mann, Renee - AMS; Pooler, Bob - AMS; Kuhn, Meg - AMS  
**Subject:** RE: aquaponic

There are certified hydroponic and aeroponic operations. In a [2010 ACA survey](#), OIA was listed as having one aeroponic operation. In the 2013 follow-up, there were at least 39 certified operations using hydroponics.

I do not know of anyone certifying aquaponic operations, however Colorado Dept of Ag has had inquiries from operations to certify. They responded that they would not certify hydroponic or aquaponic operations until the NOP wrote guidance or regulations.

I do not believe the NOP has ever issued any adverse actions against a certifying agent for certifying these types of operations.

Julie

---

**From:** Crail, Lars - AMS  
**Sent:** Wednesday, May 29, 2013 9:19 AM  
**To:** Mann, Renee - AMS; Pooler, Bob - AMS; Hartley, Julie - AMS; Kuhn, Meg - AMS  
**Subject:** RE: aquaponic

There are hydroponic operations that are certified. NOP is not disallowing certification of hydroponic operations.

I think that this might be the correct response:

“The question/issue that your raise is being considered as part of the formal rulemaking or guidance process. We are sorry we are not able to give you an individualized response at this time, but believe that a more formal evaluation process will benefit the organic community as a whole. Please keep an eye on announcements from the NOP about upcoming rulemaking or new guidance released in the Handbook.”

Lars

---

**From:** Mann, Renee - AMS  
**Sent:** Wednesday, May 29, 2013 8:58 AM  
**To:** Pooler, Bob - AMS; Hartley, Julie - AMS; Crail, Lars - AMS; Kuhn, Meg - AMS  
**Subject:** RE: aquaponic

Hi Bob:

I don't know. Are we allowing the certification of hydroponic operations? I seem to remember a time when the NOP said that hydroponic operations could not be certified because they could not meet the requirements for 205.203 (a-c) to maintain or improve physical, chemical & biological aspects of soil. My understanding is that aquaponic systems are similar to hydroponic systems where fish waste is used as nutrients.

Sorry I'm not more helpful.

Best,  
Renee

---

**From:** Pooler, Bob - AMS  
**Sent:** Tuesday, May 28, 2013 4:24 PM  
**To:** Hartley, Julie - AMS; Mann, Renee - AMS; Crail, Lars - AMS; Kuhn, Meg - AMS  
**Subject:** FW: aquaponic

As of now, these operations can be certified as long as they meet NOP reg requirements, concur?

---

**From:** Michelle Menken [<mailto:michelle.menken@mncia.org>]  
**Sent:** Tuesday, May 28, 2013 4:14 PM  
**To:** Pooler, Bob - AMS  
**Subject:** aquaponic

Hi Bob,

We are working with three different producers who want to certify their aquaponic operations and a fourth who wants to do aeroponic. Obviously it's the new hot thing. I have talked to CCOF and MOSA and gotten some guidance and we are putting the final touches on the new application form (which is our crop application modified). Do I need to send you this form when it is done? We will not be certifying fish- just crops.

Do you think seeds have to be organic as they do for sprouts in such systems, or would the "if not available" clause still apply? I'm inclined to go with must be organic as with sprouts.

Thanks.

Yours truly,

Michelle Menken  
Organic Program  
Minnesota Crop Improvement Association/MCIA  
1-855-213-4461  
612-625-3123 (direct)

## Schurkamp, Lynnea - AMS

---

**From:** Davis, Graham - AMS  
**Sent:** Monday, October 24, 2016 1:45 PM  
**To:** Courtney, Cheri - AMS; Mann, Renee - AMS  
**Subject:** RE: NOP Certification in Taiwan

Please see my updated response:

Good afternoon Lennea,

Thank you for your question regarding certification of an operation in Taiwan. The trade arrangement between the US and Taiwan includes all USDA organic products produced in the United States or its territories. USDA organic products produced outside the United States are not included in this arrangement. As such, the description of your situation would not be covered under the arrangement.

There are, however, operations certified to the USDA Organic regulations in Taiwan. Organic certifiers would need to contact Taiwan's Agriculture and Food Agency (AFA) of the Council of Agriculture (COA) for more information regarding their requirements to certifying operations in there. I hope this information is helpful to you.

Regards,

*Graham*

**Graham Davis**  
**Accreditation Manager**  
**USDA | NATIONAL ORGANIC PROGRAM**  
**1400 Independence Ave SW | 2649-S | Washington DC 20250**  
**Desk: 202-692-0047 | Cell: 202-595-4946**



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---

**From:** Courtney, Cheri - AMS  
**Sent:** Tuesday, October 18, 2016 2:32 PM  
**To:** Davis, Graham - AMS <Graham.Davis@ams.usda.gov>; Mann, Renee - AMS <Renee.Mann@ams.usda.gov>  
**Subject:** RE: NOP Certification in Taiwan

The response does not answer the question.

*Cheri*

---

**From:** Davis, Graham - AMS  
**Sent:** Tuesday, October 18, 2016 1:26 PM  
**To:** Mann, Renee - AMS <[Renee.Mann@ams.usda.gov](mailto:Renee.Mann@ams.usda.gov)>  
**Cc:** Courtney, Cheri - AMS <[Cheri.Courtney@ams.usda.gov](mailto:Cheri.Courtney@ams.usda.gov)>  
**Subject:** FW: NOP Certification in Taiwan

Renee- OC resubmitted their question using the template. Please let me know if I need to provide them with additional information in my response. Thanks.

Good afternoon Lennea,

Thank you for your question regarding certification of an operation in Taiwan. The trade arrangement between the US and Taiwan includes all USDA organic products produced in the United States or its territories. USDA organic products produced outside the United States are not included in this arrangement. As such, the description of your situation would not be covered under the arrangement.

Graham

**Graham Davis**  
**Accreditation Manager**  
**USDA | NATIONAL ORGANIC PROGRAM**  
**1400 Independence Ave SW | 2649-S | Washington DC 20250**  
**Desk: 202-692-0047 | Cell: 202-595-4946**



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---

**From:** Lennea Morris [<mailto:lennea@occert.com>]  
**Sent:** Tuesday, October 18, 2016 11:35 AM  
**To:** Davis, Graham - AMS <[Graham.Davis@ams.usda.gov](mailto:Graham.Davis@ams.usda.gov)>  
**Subject:** RE: NOP Certification in Taiwan

Hi Graham,

Ah yes, totally forgot you guys had a question template to follow, my apologies, I will insert my question into the template provided below:

1. *What is "At Issue," or your "Question":* Can we certify a hydroponic / aquaponic operator in Taiwan to the USDA NOP Regulations and would this operator be able to sell their product locally in Taiwan without any issues?
2. *Relevant Standard(s):* no specific regulation, more related to international trade arrangements.
3. *Background:* We have an interested operator in Taiwan looking to get certified by Organic Certifiers.
4. *Proposed Solution(s):* After reviewing all the material available to us online, we as a certifier are under the impression that we can certify an operator in Taiwan to the USDA NOP Regulations. With the current Export Arrangement between the US and Taiwan, it does not exclude products produced with hydroponic or aquaponic methods, therefore, it leads us to believe we can certify this applicant.
5. *Attachment(s):* <https://www.ams.usda.gov/services/organic-certification/international-trade/Taiwan>

This is an urgent matter as this operator has been waiting for us to give them a response based on our communications with you.

Please let me know if you need anything further or have any other questions.

Thank you,



Lennea Morris  
Operations Manager  
Office Phone: (805) 684-6494  
Direct Line: (951) 795-4342  
Website: [www.organiccertifiers.com](http://www.organiccertifiers.com)  
  

---

**From:** Davis, Graham - AMS [<mailto:Graham.Davis@ams.usda.gov>]  
**Sent:** Tuesday, October 18, 2016 7:20 AM  
**To:** Lennea Morris <[lennea@occert.com](mailto:lennea@occert.com)>  
**Subject:** RE: NOP Certification in Taiwan

Good morning Lennea.

Before I respond to your question, please resubmit it using the template so that I can better respond to the question. I have provide a copy of our temple below:

*Question Template*

1. *What is "At Issue," or your "Question": Please state briefly, with no more than a few sentences, the issue or the question you wish answered.*
2. *Relevant Standard(s): Please cite the relevant NOP standard(s), if applicabl.*
3. *Background: Please provide us the context surrounding the issue and/or why this question is relevant. As much as possible, keep this section brief and on topic.*
4. *Proposed Solution(s): This is your opportunity to provide us valuable input and insight. Since you have a greater understanding of the specific circumstances, you may be better equipped to foresee and suggest a solution. Your solution should be supported by the information in the other sections.*
5. *Attachment(s): Relevant documents and/or links, if applicable.*

*Urgency: If you are facing a deadline or under a time constraint, please indicate this to me. If I have this information, I will be better able to prioritize your question(s).*

Thank you.

Graham

**Graham Davis**  
**Accreditation Manager**  
**USDA | NATIONAL ORGANIC PROGRAM**  
**1400 Independence Ave SW | 2649-S | Washington DC 20250**  
**Desk: 202-692-0047 | Cell: 202-595-4946**



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---

**From:** Lennea Morris [<mailto:lennea@occert.com>]  
**Sent:** Thursday, September 29, 2016 6:21 PM  
**To:** Davis, Graham - AMS <[Graham.Davis@ams.usda.gov](mailto:Graham.Davis@ams.usda.gov)>  
**Subject:** NOP Certification in Taiwan

Hello Graham,

Hope you are doing well! Nice to meet you over email.

We do have an international question for you. After reviewing all the material available to us, we as a certifier are under the impression that we can certify an operator in Taiwan to the USDA NOP Regulations. The kicker here is that this interested applicant is a hydronic / aquaponic operator who plans to sell locally within Taiwan. With the current Export Arrangement between the US and Taiwan, it does not exclude products produced with hydroponic or aquaponic methods, therefore, it leads us to believe we can certify this applicant. Can you please confirm our thought process is correct?

Thank you so much for your time!!

Sincerely,



**Lennea Morris**  
**Operations Manager**  
Office Phone: (805) 684-6494  
Direct Line: (951) 795-4342  
Website: [www.organiccertifiers.com](http://www.organiccertifiers.com)



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## Schurkamp, Lynnea - AMS

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**From:** Katherine Borchard <kat@ascorganic.com>  
**Sent:** Wednesday, March 16, 2016 4:02 PM  
**To:** AMS - AIAinbox  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

ASCO already submitted this information on the 12<sup>th</sup> of March.

Thank you

Katherine Borchard, ASCO Program Director

Agricultural Services Certified Organic  
PO Box 4871, Salinas, CA. 93912  
P: 831.449.6365 F: 831.975.4414



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---

**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox  
**Sent:** Wednesday, March 16, 2016 12:30 PM  
**To:** AMS - AIAinbox  
**Subject:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

\*\*\*Original Message\*\*\*

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.



What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

---

**From:** Mann, Renee - AMS  
**Sent:** Wednesday, June 18, 2014 3:51 PM  
**To:** Ramkrishnan P.B.  
**Cc:** 'denise aguero'  
**Subject:** RE: Rockwool Use n organic hyrdoponic production

Hello Ram:  
Thank you. I will forward this to the people reviewing this issue.

Kind Regards,  
Renee

Ms. Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
**(202) 205-9643 - New phone number**  
[NOP website](#)  
Sign up for our newsletter, the [USDA Organic Insider](#)

---

**From:** Ramkrishnan P.B. [mailto:ram@qcsinfo.org]  
**Sent:** Wednesday, June 18, 2014 3:46 PM  
**To:** Mann, Renee - AMS  
**Cc:** 'denise aguero'  
**Subject:** RE: Rockwool Use n organic hyrdoponic production

Renee

ECOCERT-IMO. Client informed QCS they are switching because ECOCERT is allowing rockwool. QCS confirmed it via phone call between QCS and ECOCERT-IMO on June 16, 2014.

Our big picture here is to get a guidance from NOP whether rockwool would be allowed in Hydroponic/Aquaponics. This will create consistency and clients do not have to switch certifiers depending on who allows what.

A guidance would be much appreciated.

Thanks,  
Ramkrishnan

---

**From:** Mann, Renee - AMS [mailto:[Renee.Mann@ams.usda.gov](mailto:Renee.Mann@ams.usda.gov)]  
**Sent:** Tuesday, June 17, 2014 4:51 PM  
**To:** Ramkrishnan P.B.  
**Cc:** denise aguero  
**Subject:** RE: Rockwool Use n organic hyrdoponic production

Hello Ram:  
Thank you for your inquiry. In order to process such a request, I need to know what other certifier you are in disagreement with and what evidence you have that they allow rockwool.  
Thank you,

Renee

Ms. Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[NOP website](#)  
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---

**From:** Ramkrishnan P.B. [<mailto:ram@qcsinfo.org>]  
**Sent:** Tuesday, June 17, 2014 3:17 PM  
**To:** Mann, Renee - AMS  
**Cc:** denise aguero  
**Subject:** Rockwool Use n organic hyrdoponic production

Renee,

QCS is seeking guidance of rockwool in hydroponics. QCS refused to allow rockwool to be a media for crop growth in hydroponic and come in contact with organic crop. Rockwool is a synthetic. The client switched to another certifier who allows rockwool for organic hydroponic production. We were advised by NOP that when certifiers disagree to bring it to NOP attention.

A guidance on whether rockwool is allowed or not will be helpful. Question attached.

Thanks,  
Ramkrishnan

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## Schurkamp, Lynnea - AMS

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**Sent:** Wednesday, June 18, 2014 3:51 PM  
**To:** Ramkrishnan P.B.  
**Cc:** 'denise aguero'  
**Subject:** RE: Rockwool Use n organic hyrdoponic production

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Ramkrishnan

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**Sent:** Tuesday, June 17, 2014 4:51 PM  
**To:** Ramkrishnan P.B.  
**Cc:** denise aguero  
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**Sent:** Tuesday, June 17, 2014 3:17 PM  
**To:** Mann, Renee - AMS  
**Cc:** denise aguero  
**Subject:** Rockwool Use n organic hyrdoponic production

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Thanks,  
Ramkrishnan

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## Schurkamp, Lynnea - AMS

---

**From:** Mann, Renee - AMS  
**Sent:** Wednesday, August 06, 2014 7:12 PM  
**To:** DE COU Dave  
**Cc:** Brines, Lisa - AMS; Melvin, Jonathan - AMS; Courtney, Cheri - AMS  
**Subject:** RE: Rockwool

Hello Dave:

The NOP has completed a review of the rockwool issue to which you responded on July 14, 2014.

I would like to confirm that Rockwool is a synthetic material that is not allowed in organic hydroponic production per §205.100(a). Thank you for informing us that Ecocert ICO has not allowed the use of rockwool for any of its clients.

Please contact me if you have any questions or concerns.

Kind Regards,

Renee

Renee Mann

Assistant Director, Accreditation and International Activities Division

USDA National Organic Program

(202) 260-8635

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---

**From:** DE COU Dave [mailto:dave.decou@ecocert.com]

**Sent:** Monday, July 14, 2014 7:25 PM

**To:** Mann, Renee - AMS

**Cc:** Brines, Lisa - AMS; Melvin, Jonathan - AMS

**Subject:** RE: Rockwool

Renee Mann and all,

Ecocert ICO has not to date approved the use of Rockwool in any operation. We have not allowed the use of rockwool containing products but on the basis of other materials in the product. The question of rockwool appears to be forthcoming because of communication with a previous client of ours who was unable to meet the requirements to be an organic aquaponics client and chose to go to a different certifier and then has apparently chosen to return and to attempt to become certified by Ecocert ICO again after working with a consultant. Whether they can be fully certified or not is in process. Not to our knowledge have we informed them that they can use rockwool. In fact with this discussion we have stated to them that they should not use rockwool because it is in question.

The question of the allowance of rockwool as an input to an agricultural system depends upon a certain degree of interpretation of both the regulations and common practice. Rockwool is made by the melting of rock at high temperatures and creating strands by blowing air or steam through the liquid. Is the heating to 1600 degrees C of rock necessarily the creation of a synthetic? If there are additives to the process, the question becomes clearer, particularly if the additives are synthetic. Vermiculite is a particular rock which expands when heated, also commonly considered non-synthetic by all certifiers. Rockwool is considered to be environmentally good, with an ecolabel endorsement by the WHO. Clearly such a label does not determine the compliance of the material. But what about the use of other synthetic materials, not listed on 205.601, in organic production: Steel for the tools which work soil (hoes, plows, discs, etc. and rubber tires which wear out (slowly) on soil while being used on tractors and implements.

There is a progression of desired materials for organic aquaponic producers which is leading to a grey area:

- Plastic trays have been used in plug and plant production for organic producers for almost as long as plastic trays have been available to farmers. No certifier has denied the allowance of plastic trays in organic production to my knowledge and yet the various types of plastic are considered to be synthetic. If this use of plastic were eliminated for organic growers there would be a drastic reaction.
- Recently companies have blended similar types of plastic with peat moss to create a sponge like material for growing plugs or plants in. Most certifiers have indicated that this is not compliant under the regulations based on the use of a synthetic. It is not clear to me what is the difference between this use of plastic and that of plug

trays which all allow and no other certifiers have given me an answer to that question. We do not allow this product because there is also a prohibited fungicide in the product, but both our clients and the manufacturer want us to allow it if the fungicide and any other prohibited substance were removed. The client considered the sponge like material to be a container much like a plastic tray. Insight on this issue would be helpful.

- Rockwool as a growing medium, blended with other allowed ingredients or just alone is also a desirable medium for growers. So is it a container, as the plastic trays above, or something else? And where do we as certifiers draw the line if you consider rockwool to be synthetic? This question will keep coming up for certifiers and their clients.

Regards,  
Dave



David DeCOU  
Certification Manager  
ECOCERT ICO LLC, 70 East Main Street, Ste. B  
Greenwood, Indiana 46143  
Toll Free: 888-337-8246 Office: 317-865-9700,  
Fax: 317-865-9707, Cell: [\(b\) \(6\)](tel:(b)(6)) (Oregon)  
<mailto:dave.decou@ecocert.com> / [www.ecocertico.com](http://www.ecocertico.com)

---

**From:** Mann, Renee - AMS [<mailto:Renee.Mann@ams.usda.gov>]

**Sent:** Tuesday, June 24, 2014 8:35 PM

**To:** DE COU Dave

**Cc:** Brines, Lisa - AMS; Melvin, Jonathan - AMS

**Subject:** Rockwool

Dear Dave,

This email is a request for additional information in accordance with [NOP Policy Memo 11-4](#), Evaluation of Materials Used in Organic Crop, Livestock, and Handling Operations.

NOP Policy Memo 11-4 provides a process for resolving conflicts in interpretation on the allowance of materials under the USDA organic regulations.

On June 17, 2014, a certifier contacted NOP regarding the use of Rockwool in organic hydroponic production.

Specifically, the certifier requested NOP's interpretation on the allowance of Rockwool as an approved growing media in organic hydroponic operations. An operation that was denied the use of Rockwool in its hydroponic operation by its previous certifier was changing certifiers to Ecocert-ICO so that they could use this substance as a growing media for their organic hydroponic production.

In order to resolve this conflict in interpretation on the use of Rockwool in organic hydroponic production, **NOP requests that you provide a brief written summary of any current or previous decisions to approve or deny the use of Rockwool in organic hydroponic production.** The summary should include citations to relevant sections of the USDA organic regulations, as applicable, and indicate whether the Rockwool was previously approved or denied as a synthetic or nonsynthetic substance.

Following receipt, NOP will review the information provided from all parties and determine whether the regulations have been properly applied. NOP's determination will be limited to the application of the USDA organic regulations for generic materials; the NOP does not approve or endorse branded (formulated) input products.

A written response to this inquiry is requested no later than Tuesday, July 15th.

Sincerely,

Renee

Ms. Renee Mann

Assistant Director, Accreditation and International Activities Division

USDA National Organic Program

(202) 260-8635

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## Schurkamp, Lynnea - AMS

---

**From:** Mann, Renee - AMS  
**Sent:** Wednesday, May 29, 2013 8:58 AM  
**To:** Pooler, Bob - AMS; Hartley, Julie - AMS; Crail, Lars - AMS; Kuhn, Meg - AMS  
**Subject:** RE: aquaponic

Hi Bob:

I don't know. Are we allowing the certification of hydroponic operations? I seem to remember a time when the NOP said that hydroponic operations could not be certified because they could not meet the requirements for 205.203 (a-c) to maintain or improve physical, chemical & biological aspects of soil. My understanding is that aquaponic systems are similar to hydroponic systems where fish waste is used as nutrients.

Sorry I'm not more helpful.

Best,  
Renee

---

**From:** Pooler, Bob - AMS  
**Sent:** Tuesday, May 28, 2013 4:24 PM  
**To:** Hartley, Julie - AMS; Mann, Renee - AMS; Crail, Lars - AMS; Kuhn, Meg - AMS  
**Subject:** FW: aquaponic

As of now, these operations can be certified as long as they meet NOP reg requirements, concur?

---

**From:** Michelle Menken [<mailto:michelle.menken@mncia.org>]  
**Sent:** Tuesday, May 28, 2013 4:14 PM  
**To:** Pooler, Bob - AMS  
**Subject:** aquaponic

Hi Bob,

We are working with three different producers who want to certify their aquaponic operations and a fourth who wants to do aeroponic. Obviously it's the new hot thing. I have talked to CCOF and MOSA and gotten some guidance and we are putting the final touches on the new application form (which is our crop application modified). Do I need to send you this form when it is done? We will not be certifying fish- just crops.

Do you think seeds have to be organic as they do for sprouts in such systems, or would the "if not available" clause still apply? I'm inclined to go with must be organic as with sprouts.

Thanks.

Yours truly,

Michelle Menken  
Organic Program  
Minnesota Crop Improvement Association/MCIA  
1-855-213-4461  
612-625-3123 (direct)

## Schurkamp, Lynnea - AMS

---

**From:** Mann, Renee - AMS  
**Sent:** Tuesday, June 17, 2014 4:51 PM  
**To:** Ramkrishnan P.B.  
**Cc:** denise aguero  
**Subject:** RE: Rockwool Use n organic hydrponic production

Hello Ram:

Thank you for your inquiry. In order to process such a request, I need to know what other certifier you are in disagreement with and what evidence you have that they allow rockwool.

Thank you,

Renee

Ms. Renee Mann  
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**From:** Ramkrishnan P.B. [mailto:ram@qcsinfo.org]  
**Sent:** Tuesday, June 17, 2014 3:17 PM  
**To:** Mann, Renee - AMS  
**Cc:** denise aguero  
**Subject:** Rockwool Use n organic hydrponic production

Renee,

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A guidance on whether rockwool is allowed or not will be helpful. Question attached.

Thanks,  
Ramkrishnan

## Schurkamp, Lynnea - AMS

---

**From:** Mann, Renee - AMS  
**Sent:** Wednesday, August 06, 2014 7:08 PM  
**To:** Ramkrishnan P.B.  
**Cc:** denise aguero; Courtney, Cheri - AMS; Brines, Lisa - AMS; Melvin, Jonathan - AMS  
**Subject:** RE: Rockwool Use n organic hyrdoponic production

Hello Ram:

The NOP has completed a review of the rockwool issue you posed on June 17, 2014. I would like to confirm that Rockwool is not allowed in organic hydroponic production.

Ecocert ICO confirmed that it has not allowed the use of rockwool for any of its clients. Ecocert ICO noted that it worked with a client that attempted to change certifiers that has now returned to Ecocert ICO for certification. The operation has sought the help of a consultant and originally requested to use rockwool. Ecocert ICO told the client that rockwool is not allowed. We will reiterate to Ecocert ICO that rockwool is a synthetic material that is not allowed according to the regulations.

Thank you for bringing this matter to our attention. Please contact me if you have any further questions.

Kind Regards,  
Renee

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

---

**From:** Ramkrishnan P.B. [mailto:ram@qcsinfo.org]  
**Sent:** Tuesday, June 17, 2014 3:17 PM  
**To:** Mann, Renee - AMS  
**Cc:** denise aguero  
**Subject:** Rockwool Use n organic hyrdoponic production

Renee,

QCS is seeking guidance of rockwool in hydroponics. QCS refused to allow rockwool to be a media for crop growth in hydroponic and come in contact with organic crop. Rockwool is a synthetic. The client switched to another certifier who allows rockwool for organic hydroponic production. We were advised by NOP that when certifiers disagree to bring it to NOP attention.

A guidance on whether rockwool is allowed or not will be helpful. Question attached.

Thanks,  
Ramkrishnan

## Schurkamp, Lynnea - AMS

---

**From:** DE COU Dave <dave.decou@ecocert.com>  
**Sent:** Monday, July 14, 2014 7:25 PM  
**To:** Mann, Renee - AMS  
**Cc:** Brines, Lisa - AMS; Melvin, Jonathan - AMS  
**Subject:** RE: Rockwool

Renee Mann and all,

Ecocert ICO has not to date approved the use of Rockwool in any operation. We have not allowed the use of rockwool containing products but on the basis of other materials in the product. The question of rockwool appears to be forthcoming because of communication with a previous client of ours who was unable to meet the requirements to be an organic aquaponics client and chose to go to a different certifier and then has apparently chosen to return and to attempt to become certified by Ecocert ICO again after working with a consultant. Whether they can be fully certified or not is in process. Not to our knowledge have we informed them that they can use rockwool. In fact with this discussion we have stated to them that they should not use rockwool because it is in question.

The question of the allowance of rockwool as an input to an agricultural system depends upon a certain degree of interpretation of both the regulations and common practice. Rockwool is made by the melting of rock at high temperatures and creating strands by blowing air or steam through the liquid. Is the heating to 1600 degrees C of rock necessarily the creation of a synthetic? If there are additives to the process, the question becomes clearer, particularly if the additives are synthetic. Vermiculite is a particular rock which expands when heated, also commonly considered non-synthetic by all certifiers. Rockwool is considered to be environmentally good, with an ecolabel endorsement by the WHO. Clearly such a label does not determine the compliance of the material. But what about the use of other synthetic materials, not listed on 205.601, in organic production: Steel for the tools which work soil (hoes, plows, discs, etc. and rubber tires which wear out (slowly) on soil while being used on tractors and implements.

There is a progression of desired materials for organic aquaponic producers which is leading to a grey area:

- Plastic trays have been used in plug and plant production for organic producers for almost as long as plastic trays have been available to farmers. No certifier has denied the allowance of plastic trays in organic production to my knowledge and yet the various types of plastic are considered to be synthetic. If this use of plastic were eliminated for organic growers there would be a drastic reaction.
- Recently companies have blended similar types of plastic with peat moss to create a sponge like material for growing plugs or plants in. Most certifiers have indicated that this is not compliant under the regulations based on the use of a synthetic. It is not clear to me what is the difference between this use of plastic and that of plug trays which all allow and no other certifiers have given me an answer to that question. We do not allow this product because there is also a prohibited fungicide in the product, but both our clients and the manufacturer want us to allow it if the fungicide and any other prohibited substance were removed. The client considered the sponge like material to be a container much like a plastic tray. Insight on this issue would be helpful.
- Rockwool as a growing medium, blended with other allowed ingredients or just alone is also a desirable medium for growers. So is it a container, as the plastic trays above, or something else? And where do we as certifiers draw the line if you consider rockwool to be synthetic? This question will keep coming up for certifiers and their clients.

Regards,  
Dave



David DeCOU

Certification Manager

ECOCERT ICO LLC, 70 East Main Street, Ste. B

Greenwood, Indiana 46143

Toll Free: 888-337-8246 Office: 317-865-9700,

Fax: 317-865-9707, Cell: (b) (6) (Oregon)  
<mailto:dave.decou@ecocert.com> / [www.ecocertico.com](http://www.ecocertico.com)

---

**From:** Mann, Renee - AMS [<mailto:Renee.Mann@ams.usda.gov>]

**Sent:** Tuesday, June 24, 2014 8:35 PM

**To:** DE COU Dave

**Cc:** Brines, Lisa - AMS; Melvin, Jonathan - AMS

**Subject:** Rockwool

Dear Dave,

This email is a request for additional information in accordance with [NOP Policy Memo 11-4](#), Evaluation of Materials Used in Organic Crop, Livestock, and Handling Operations.

NOP Policy Memo 11-4 provides a process for resolving conflicts in interpretation on the allowance of materials under the USDA organic regulations.

On June 17, 2014, a certifier contacted NOP regarding the use of Rockwool in organic hydroponic production.

Specifically, the certifier requested NOP's interpretation on the allowance of Rockwool as an approved growing media in organic hydroponic operations. An operation that was denied the use of Rockwool in its hydroponic operation by its previous certifier was changing certifiers to Ecocert-ICO so that they could use this substance as a growing media for their organic hydroponic production.

In order to resolve this conflict in interpretation on the use of Rockwool in organic hydroponic production, **NOP requests that you provide a brief written summary of any current or previous decisions to approve or deny the use of Rockwool in organic hydroponic production.** The summary should include citations to relevant sections of the USDA organic regulations, as applicable, and indicate whether the Rockwool was previously approved or denied as a synthetic or nonsynthetic substance.

Following receipt, NOP will review the information provided from all parties and determine whether the regulations have been properly applied. NOP's determination will be limited to the application of the USDA organic regulations for generic materials; the NOP does not approve or endorse branded (formulated) input products.

A written response to this inquiry is requested no later than Tuesday, July 15th.

Sincerely,

Renee

Ms. Renee Mann

Assistant Director, Accreditation and International Activities Division

USDA National Organic Program

(202) 260-8635

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## Schurkamp, Lynnea - AMS

---

**From:** Mann, Renee - AMS  
**Sent:** Tuesday, July 15, 2014 8:38 AM  
**To:** DE COU Dave  
**Cc:** Brines, Lisa - AMS; Melvin, Jonathan - AMS  
**Subject:** Re: Rockwool

Hello Dave,

Thank you for your response.

Kind Regards,  
Renee

Sent from my iPhone

On Jul 14, 2014, at 7:24 PM, "DE COU Dave" <[dave.decou@ecocert.com](mailto:dave.decou@ecocert.com)> wrote:

Renee Mann and all,

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Regards,

Dave

David DeCOU

Certification Manager

ECOCERT ICO LLC, 70 East Main Street, Ste. B

Greenwood, Indiana 46143

Toll Free: 888-337-8246 Office: 317-865-9700,

Fax: 317-865-9707, Cell: (b) (6) (Oregon)

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**From:** Mann, Renee - AMS [<mailto:Renee.Mann@ams.usda.gov>]

**Sent:** Tuesday, June 24, 2014 8:35 PM

**To:** DE COU Dave

**Cc:** Brines, Lisa - AMS; Melvin, Jonathan - AMS

**Subject:** Rockwool

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Sincerely,

Renee

Ms. Renee Mann

Assistant Director, Accreditation and International Activities Division

USDA National Organic Program

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## Schurkamp, Lynnea - AMS

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David DeCOU

Certification Manager

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**From:** Mann, Renee - AMS [<mailto:Renee.Mann@ams.usda.gov>]

**Sent:** Tuesday, June 24, 2014 8:35 PM

**To:** DE COU Dave

**Cc:** Brines, Lisa - AMS; Melvin, Jonathan - AMS

**Subject:** Rockwool

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Sincerely,

Renee

Ms. Renee Mann

Assistant Director, Accreditation and International Activities Division

USDA National Organic Program

(202) 260-8635

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## Schurkamp, Lynnea - AMS

---

**From:** Steve J. Marty <s\_marty@agri.nv.gov>  
**Sent:** Monday, July 22, 2013 5:16 PM  
**To:** Mann, Renee - AMS; Hartley, Julie - AMS  
**Subject:** RE: USDA NOP hydroponic

Thanks Renee! We don't mean to 'stir the pot', but clarification will be appreciated.

Cheers

Steve Marty

Agriculturist IV

Nevada Department of Agriculture

405 South 21st Street

Sparks NV 89431

775-353-3773

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-----Original Message-----

**From:** Mann, Renee - AMS [mailto:Renee.Mann@ams.usda.gov]

**Sent:** Monday, July 22, 2013 10:22 AM

**To:** Steve J. Marty; Hartley, Julie - AMS

**Subject:** RE: USDA NOP hydroponic

Dear Steve:

Thank you for informing us of this situation. I will forward this information to Miles and our accreditation division, so that they are aware of the confusion this has caused. I will let you know if we have any questions for you, if I can provide any further guidance, and/or if we have plans to create a formal action or recommendation on this topic.

Kind regards,

Renee

Ms. Renee Mann

Agricultural Marketing Specialist

USDA National Organic Program

+1 (202) 205-5213

[NOP website](#)

Sign up for the [NOP Organic Insider](#), NOP's newsletter.

---

**From:** Steve J. Marty [mailto:s\_marty@agri.nv.gov]

**Sent:** Thursday, July 18, 2013 7:01 PM

**To:** Hartley, Julie - AMS

**Cc:** Mann, Renee - AMS

**Subject:** USDA NOP hydroponic

Hello,

NDA has an inquiry regarding certification of hydroponic and/or aquaponic production systems to USDA NOP standards, and I've included both our new and old accreditation managers on this email just in case. NDA is familiar with the NOSB recommendation stating that hydroponic operations are not eligible for certification to USDA NOP standards. Additionally, Miles McEvoy confirmed that USDA NOP agreed with this recommendation when speaking publicly at a Nevada Organic Advisory Council workshop in Las Vegas a few years back. However, no formal action has been taken on the recommendation and it is clear that a number of accredited-certifiers are in fact granting certification to hydroponic and aquaponic operations. Given the NOSB recommendation and Miles' personal backing of that recommendation, NDA has turned away a good number of

potential clients. Other accredited-certifiers who work in our State are certifying these operations, apparently based on non-official feedback from Miles/NOP, creating what we feel is an unfair certification/business environment. NDA would like to request clarification from USDA NOP regarding the eligibility of hydroponic and aquaponic production systems to receive certification to USDA NOP standards. Please let us know if additional information is needed. We look forward to your response.

Cheers

Steve Marty

Agriculturist IV

Nevada Department of Agriculture

405 South 21st Street

Sparks NV 89431

775-353-3773

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SEPTEMBER 8, 2014

**Elliott  
Gardens**

6321 LOWELL BLVD.  
DENVER, COLO.80221  
Ph.303 428-4043  
Fax.303-428-4075  
E-mail [brettelliottgardens@comcast.net](mailto:brettelliottgardens@comcast.net)

Dear Secretary Vilsack,

We formerly request reinstatement of organic certification of our organic growing operation pursuant to 205.662(f)(1) of the USDA organic regulations.

On July 12, 2010, The Colorado Department of Agriculture suspended our certification for the "sale of conventional herbs as organic" and suspended our organic certification for one year from that date. At the time of the suspension we were certified as a process handler/repacker of fresh herbs. On 12-05-12 we were certified by CCOF as a network grower for Circle Fresh Farms. We were certified for container production of organic cucumbers, tomatoes, and sweet basil. At that time, CCOF did not mention to me that I needed to get reinstated from NOP before I could be certified through them. We resigned as a grower for Circle Fresh Farms on 6-01-14. At that time, we understood that our organic certification through CCOF would no longer be valid since we were no longer affiliated with Circle Fresh Farms. We then pursued certification with A Bee Organic. On 6-22-14, A Bee Organic conducted a full onsite inspection to verify our compliance with the regulations.

We have asked A Bee Organic to provide you with the necessary supporting documentation. We would appreciate your prompt consideration for this request for reinstatement.

(b) (6)

Sincerely, Brett A. Elliott X---

Brett A Elliott  
Manager / Grower / Co-Owner  
Elliott Gardens





## Quality Certification Services (QCS)

PO Box 12311 Gainesville FL 32604

phone 352.377.0133 / fax 352.377.8363 / [www.qcsinfo.org](http://www.qcsinfo.org)

QCS is the Certification Program of Florida Certified Organic Growers and Consumers, Inc. (FOG)

June 17, 2014

Renee Mann  
Regional Accreditation Manager  
USDA National Organic Program  
1400 Independence Ave., SW  
Room 2648 – South, Stop 0268  
Washington, DC 20250

Dear Ms. Mann,

Quality Certification Services (QCS) is a USDA accredited certifying agent based in Gainesville, Florida. QCS certifies crop, wild crop, livestock, and handling operations to the National Organic Program standards. This letter is a request for NOP guidance. All pertinent information is listed below in compliance with the NOP "Certifier Questions to the NOP" proper question submission format.

1. What is "At Issue," or your "Question"

Is Rockwool or any other synthetic material able to be used as a media in a certified organic, hydroponic operation?

2. Relevant Standard

In reference to §205.105(a) of the National Organic Program, it is stated: *To be sold or labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))," the product must be produced and handled without the use of: (a) synthetic substances and ingredients, except as provided in §205.601 or 205.603.*

3. Background

Hydroponic growing systems typically rely on an inert growing media to be used as an anchor for plant roots. Many conventional growers in the industry use Rockwool, a synthetically derived substance, as a media. Alternatively, there are many successful certified organic growers that are not using Rockwool or synthetic materials as a media, and using NOP compliant materials instead. Consistent with the NOP, the Organic Materials Review Institute (OMRI) has ruled that Rockwool is not able to be used in organic crop production as a crop fertilizer, soil amendment, crop management tool, or production aid. OMRI based their decision on §205.105(a) of the NOP rules and regulations. The rule, listed above, insists that synthetic substances are not to be used with products claiming organic status. Some grower's and certifier's interpretations of rule §205.105(a) are that it is not applicable to hydroponic soil media because the material stays intact in the system. It is highly unlikely that 100% of the synthetic ingredients contained in Rockwool (and similar synthetic products) stay intact in the system. These synthetic materials and plugs are subject to degradation, and worst, are in direct contact with plant material.

4. Proposed Solution

Based on the NOP regulations in place for (b) (4)

5. Attachment

Not Applicable

6. Urgency

Pressing; many hydroponic operations are seeking to be certified organic. These same operations need guidance on if Rockwool and other synthetically-derived materials are able to be used as a plant media source.

QCS strives to ensure that our certification program is wholly consistent with the National Organic Program standards as set forth in 7 CFR Part 205. Therefore, we greatly appreciate your guidance on this issue. Please do not hesitate to contact us with any questions you may have about this letter.

Sincerely,

Ramkrishnan,  
Chief Operating Officer



## Schurkamp, Lynnea - AMS

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**From:** Ramkrishnan P.B. <ram@qcsinfo.org>  
**Sent:** Tuesday, June 17, 2014 3:17 PM  
**To:** Mann, Renee - AMS  
**Cc:** denise aguero  
**Subject:** Rockwool Use n organic hyrdoponic production  
**Attachments:** Rockwool.docx

Renee,

QCS is seeking guidance of rockwool in hydroponics. QCS refused to allow rockwool to be a media for crop growth in hydroponic and come in contact with organic crop. Rockwool is a synthetic. The client switched to another certifier who allows rockwool for organic hydroponic production. We were advised by NOP that when certifiers disagree to bring it to NOP attention.

A guidance on whether rockwool is allowed or not will be helpful. Question attached.

Thanks,  
Ramkrishnan

## Schurkamp, Lynnea - AMS

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**From:** Mann, Renee - AMS  
**Sent:** Tuesday, June 24, 2014 11:35 PM  
**To:** dave.decou@ecocert.com  
**Cc:** Brines, Lisa - AMS; Melvin, Jonathan - AMS  
**Subject:** Rockwool

Dear Dave,

This email is a request for additional information in accordance with [NOP Policy Memo 11-4](#), Evaluation of Materials Used in Organic Crop, Livestock, and Handling Operations.

NOP Policy Memo 11-4 provides a process for resolving conflicts in interpretation on the allowance of materials under the USDA organic regulations.

On June 17, 2014, a certifier contacted NOP regarding the use of Rockwool in organic hydroponic production. Specifically, the certifier requested NOP's interpretation on the allowance of Rockwool as an approved growing media in organic hydroponic operations. An operation that was denied the use of Rockwool in its hydroponic operation by its previous certifier was changing certifiers to Ecocert-ICO so that they could use this substance as a growing media for their organic hydroponic production.

In order to resolve this conflict in interpretation on the use of Rockwool in organic hydroponic production, **NOP requests that you provide a brief written summary of any current or previous decisions to approve or deny the use of Rockwool in organic hydroponic production.** The summary should include citations to relevant sections of the USDA organic regulations, as applicable, and indicate whether the Rockwool was previously approved or denied as a synthetic or nonsynthetic substance.

Following receipt, NOP will review the information provided from all parties and determine whether the regulations have been properly applied. NOP's determination will be limited to the application of the USDA organic regulations for generic materials; the NOP does not approve or endorse branded (formulated) input products.

A written response to this inquiry is requested no later than Tuesday, July 15th.

Sincerely,  
Renee

Ms. Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[NOP website](#)  
Sign up for our newsletter, the [USDA Organic Insider](#)

## Schurkamp, Lynnea - AMS

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**From:** Steve J. Marty <s\_marty@agri.nv.gov>  
**Sent:** Thursday, July 18, 2013 7:01 PM  
**To:** Hartley, Julie - AMS  
**Cc:** Mann, Renee - AMS  
**Subject:** USDA NOP hydroponic

Hello,

NDA has an inquiry regarding certification of hydroponic and/or aquaponic production systems to USDA NOP standards, and I've included both our new and old accreditation managers on this email just in case. NDA is familiar with the NOSB recommendation stating that hydroponic operations are not eligible for certification to USDA NOP standards. Additionally, Miles McEvoy confirmed that USDA NOP agreed with this recommendation when speaking publicly at a Nevada Organic Advisory Council workshop in Las Vegas a few years back. However, no formal action has been taken on the recommendation and it is clear that a number of accredited-certifiers are in fact granting certification to hydroponic and aquaponic operations. Given the NOSB recommendation and Miles' personal backing of that recommendation, NDA has turned away a good number of potential clients. Other accredited-certifiers who work in our State are certifying these operations, apparently based on non-official feedback from Miles/NOP, creating what we feel is an unfair certification/business environment. NDA would like to request clarification from USDA NOP regarding the eligibility of hydroponic and aquaponic production systems to receive certification to USDA NOP standards. Please let us know if additional information is needed. We look forward to your response.

Cheers

Steve Marty

Agriculturist IV

Nevada Department of Agriculture

405 South 21st Street

Sparks NV 89431

775-353-3773

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STOP 0202-Room 3943-S  
1400 Independence Avenue, SW.  
Washington, DC 20250-0202

March 13, 2017

In reply, please refer to  
2016-AMS-05787-F

Jason Cole  
Research Associate  
The Cornucopia Institute  
P.O. Box 126  
Cornucopia, Wisconsin

Dear Jason Cole:

This is an interim response to the above referenced FOIA request which sought “all correspondence between the National Organic Program and accredited organic certifiers that discusses or describes hydroponics, aquaponics, biaponics, ponics or container growing.”

A search was conducted within the Accreditation and International Activities Division of the National Organic Program, Agricultural Marketing Service. This search resulted in the identification of 248 pages of responsive records. Within this record set, 52 pages were partially redacted pursuant to exemptions (b)(4), (b)(5) and (b)(6).

The following information provides the basis for our withholding under the applicable FOIA exemption:

Trade Secrets, Commercial and Financial Information, and Confidential Information – Exemption 5  
U.S.C. §552(b)(4)

Exemption (b)(4) of the FOIA protects “trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential” (5 U.S.C. §552(b)(4) (2006), amended by the OPEN Government Act of 2007, Pub. L. No. 100-175, 121 Stat. 2524). This exemption is intended to protect the interests of both the government and submitters of information [See, e.g., Nat’l Parks & Conservation Ass’n v. Morton, 498 F. 2d 765, 767-70 (D.C. Cir. 1974) (concluding that the legislative history of the FOIA “firmly supports an inference that Exemption (b)(4) is intended for the benefit of persons who supply information as well as the agencies which collect it”)]. The information AMS is withholding consists of confidential business information such as product names and farming practices.

Attorney-Client Privilege – Exemption 5 U.S.C. §552(b)(5)

Exemption (b)(5) of the FOIA protects “inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than in litigation with the agency.” The Agency records that are subject to protection in full or in part under Exemption 5 are pre-decisional and/or deliberative. As a threshold matter, the responsive records must be inter-agency or intra-agency documents in order to be protected from disclosure under Exemption (b)(5). Further, to come within the scope of Exemption (b)(5), the responsive records must fall within the coverage of a privileged record in litigation. The deliberative process privilege is one of the litigation privileges that may be invoked under Exemption (b)(5) in order to withhold responsive information. This Exemption of the FOIA protects the “decision making processes of government agencies.” NLRB v. Sears Roebuck & Co., 421 U.S. 132, 150 (1975);

see also Missouri ex rel. Shorr v. U.S. Army Corps of Eng'rs, 147 F.3d 708, 710 (8th Cir. 1998) (“The purpose of the deliberative process privilege is to allow agencies freely to explore alternative avenues of action and to engage in internal debates without fear of public scrutiny.”) Within this record set, AMS is withholding a deliberation about a policy issue between employees of the National Organic Program.

Personal Privacy Interests – Exemption 5 U.S.C. §552(b)(6)

Exemption (b)(6) of the FOIA permits the government to withhold information regarding individuals in “personnel and medical files and similar files” when the disclosure of such information “would constitute a clearly unwarranted invasion of personal privacy” and where such privacy interests outweigh any public interest which would be advanced by the disclosure of their contact information. As a threshold matter, Exemption (b)(6) protects not only personnel files and medical files, but “similar” files, which are interpreted by courts to cover personal information pertaining to individuals. Within this record set, AMS is withholding personal email addresses, Skype names, a personal mailing address, and cell phone numbers.

We will continue to process your request. You can expect to receive our next response no later than April 14, 2017.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory Bridges". The signature is written in a cursive style with a large initial "G".

Gregory Bridges  
FOIA Officer  
USDA, Agricultural Marketing Service

## Schurkamp, Lynnea - AMS

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**From:** OMIC-OCD (Yoshida) <ocd@omicnet.com>  
**Sent:** Tuesday, March 01, 2016 9:01 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** Answer from Overseas Merchandise Inspection Co., Ltd.(OMIC)  
**Attachments:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems.eml

Dear Ms. Bridget Mcleroy

We are answering to your question by the attached e-mail that we donot certify certify hydroponic, aeroponic or aquaponics operations.

Overseas Merchandise Inspection Co., Ltd. (OMIC) Hisashi Yoshida

## Schurkamp, Lynnea - AMS

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**From:** Michelle Menken <michelle.menken@mncia.org>  
**Sent:** Wednesday, March 23, 2016 4:19 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** aquaponic/hydroponic

Hello Bridget,

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **Yes**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **We have two certified operations- one aquaponics and one hydroponic.**

In what state or country (if international) are the certified operations located (list)? **Both are in Minnesota.**

What crops do these certified operations produce (list)? **Here are the crop lists off the two certificates:**

#### **100% Organic Production**

Products: Aquaponic production of Arugula; Basil; Chard; Cilantro; Kale; Lettuce; Mint;  
Pak choi; Parsley; Rosemary; Spinach; Tofu; Thyme; and Watercress

#### **100% Organic Production**

Processes: Growing in hydroponic system and packaging  
Products: Arugula; Basil; Bay leaves; Chervil; Chives; Cilantro; Dill; Lavender; Lemongrass;  
Marjoram; Mint; Oregano; Parsley; Sage; Savory; Sorrel; Tarragon; Thyme;  
Thyme (lemon); and Watercress

Yours truly,

Michelle Menken  
Organic Program  
Minnesota Crop Improvement Association/MCIA  
1-855-213-4461  
612-625-3123 (direct)

## Schurkamp, Lynnea - AMS

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**From:** Sonja Huigen, IMO <Sonja.Huigen@imo.ch>  
**Sent:** Thursday, March 17, 2016 11:52 AM  
**To:** McElroy, Bridget - AMS  
**Cc:** Beatrice Breuer, IMO  
**Subject:** AW: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget,  
I am not aware that we currently certify one of the below mentioned production systems. If this would change in the future, I'll contact you to keep you updated.  
Kind regards,  
Sonja  
IMOsuisse AG

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**Von:** Baron , Anne - AMS [AnneP.Baron@ams.usda.gov]" im Auftrag von "AMS - AIAinbox [AIAinbox@ams.usda.gov]  
**Gesendet:** Mittwoch, 16. März 2016 20:30  
**An:** AMS - AIAinbox  
**Betreff:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

\*\*\*Original Message\*\*\*

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets



- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

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**From:** Moutapam, Annette (Prüfinstitut LACON GmbH) <a.moutapam@lacon-institut.org>  
**Sent:** Tuesday, March 01, 2016 11:12 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** [CAUTION: Suspicious Link]WG: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

### [CAUTION: Suspicious Link]

The following message contains links to web content using **potentially** malicious URLs/links. Links structured like these are used in targeted phishing and malware attacks against USDA recipients.

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With all trusted links, and when practical, type URLs into a browser instead of clicking.

Questions: Contact Client Technology Services (CTS) via email at (Spam.Abuse@wdc.usda.gov)

Dear Bridget

Further to your message below please find the following answers on behalf of LACON GmbH, Germany:

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **No**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **None**

In what state or country (if international) are the certified operations located (list)? **None**

What crops do these certified operations produce (list)? **None**

Best regards,  
Annette Moutapam

Mit freundlichen Grüßen

Annette Moutapam  
Team International

Telefon +49 (0) 781 96679-242  
Telefax +49 (0) 781 96679-300  
Mobil (b) (6)  
[a.moutapam@lacon-institut.org](mailto:a.moutapam@lacon-institut.org)  
[www.lacon-institut.com](http://www.lacon-institut.com)

Prüfinstitut LACON GmbH. Zentrale Offenburg, Moltkestr. 4, 77654 Offenburg  
HRB 471342 Amtsgericht Freiburg  
Geschäftsführung: Dr. H.-Joachim Kopp, Jürgen Schwarz

## Audits und Zertifizierungen:

Bio-Produkte / IFS Standards / Ohne Gentechnik / ggA, gU, gtS / GQ-Bayern / QS / GLOBALG.A.P. / RSPO / UTZ / REDcert / ISO 9001 / KAT / Regionalfenster / GMF / HACCP / ZNU / Vegan

## Bio-Betriebe:

Die deutschen Bio-Betriebe finden Sie auf der behördlich autorisierten Webseite:

<http://www.oeko-kontrollstellen.de/suchebiunternehmen/SuchForm.php>

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**Von:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **Im Auftrag von** AMS - AIAinbox

**Gesendet:** Dienstag, 1. März 2016 16:12

**An:** AMS - AIAinbox

**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); 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**Betreff:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

#### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

#### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,

Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Rendon, Iris <irendon@gftc.ca>  
**Sent:** Thursday, March 10, 2016 2:19 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**Attachments:** Greenhouse Operators for NOP.xlsx

**Importance:** High

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **Yes**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **Three, however, please see attachment with comments. You may arrive at a different conclusion.**

In what state or country (if international) are the certified operations located (list)? **See attached.**

What crops do these certified operations produce (list)? **See attached.**

### **Iris Rendon**

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**From:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **On Behalf Of** AMS - AIAinbox

**Sent:** March-01-16 10:12 AM

**To:** AMS - AIAinbox

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**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Dave Lockman <dave.lockman@pro-cert.org>  
**Sent:** Wednesday, March 09, 2016 1:16 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget,

We do not currently certify hydroponic, aeroponic or aquaponics operations.

If you have any questions please do not hesitate to contact me.

Sincerely,

**Pro-Cert Organic Systems Ltd.**

Dave Lockman, MBA, P.Ag.

Certification Manager, Eastern Region

2311 Elm Tree Road, P.O. Box 74  
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**From:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **On Behalf Of** AMS - AIAinbox  
**Sent:** March-01-16 10:12 AM  
**To:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>  
**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); Koble, Clinton - FSA, Reno, NV <[clinton.koble@nv.usda.gov](mailto:clinton.koble@nv.usda.gov)>; [emel.erkon@bio-inspecta.com](mailto:emel.erkon@bio-inspecta.com); [central@biolatina.com](mailto:central@biolatina.com); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); [amalia.rueda@bioagricert.org](mailto:amalia.rueda@bioagricert.org); [admin@bio-inspecta.ch](mailto:admin@bio-inspecta.ch); [central@biolatina.com](mailto:central@biolatina.com); [Pat.Kennelly@cdph.ca.gov](mailto:Pat.Kennelly@cdph.ca.gov); [info@bioagricert.org](mailto:info@bioagricert.org); [julia.winter@bio-inspecta.ch](mailto:julia.winter@bio-inspecta.ch); [accreditation@ccof.org](mailto:accreditation@ccof.org); [Bolicert@megalink.com](mailto:Bolicert@megalink.com); [riccardo.cozzo@bioagricert.org](mailto:riccardo.cozzo@bioagricert.org); [calidad@certimexsc.com](mailto:calidad@certimexsc.com); [rporto@caae.es](mailto:rporto@caae.es); [Bolicert@bolicert.org](mailto:Bolicert@bolicert.org); [tom.nizet@certisys.eu](mailto:tom.nizet@certisys.eu); [ccof@ccof.org](mailto:ccof@ccof.org); [rporto@caae.es](mailto:rporto@caae.es); [saltmn@clemson.edu](mailto:saltmn@clemson.edu); [ccpb@ccpb.it](mailto:ccpb@ccpb.it); [Danny.Lee@cdfa.ca.gov](mailto:Danny.Lee@cdfa.ca.gov); [mitchell.yergert@state.co.us](mailto:mitchell.yergert@state.co.us); [certimex@certimexsc.com](mailto:certimex@certimexsc.com); Lewin Jake-FASConatct <[jake@ccof.org](mailto:jake@ccof.org)>; [jvdschootbrugge@controlunion.com](mailto:jvdschootbrugge@controlunion.com); [ceres@ceres-cert.com](mailto:ceres@ceres-cert.com); [rsetti@ccpb.it](mailto:rsetti@ccpb.it); [vincent.morel@ecocert.com](mailto:vincent.morel@ecocert.com); [info@certisys.eu](mailto:info@certisys.eu); [direccionejecutiva@certimexsc.com](mailto:direccionejecutiva@certimexsc.com); [agroecologiauna@gmail.com](mailto:agroecologiauna@gmail.com); [organic@clemson.edu](mailto:organic@clemson.edu); [benzing@ceres-cert.com](mailto:benzing@ceres-cert.com); [mefraga@foodsafety.com.ar](mailto:mefraga@foodsafety.com.ar); [amy.stafford@state.co.us](mailto:amy.stafford@state.co.us); [Nathalie.Boes@certisys.eu](mailto:Nathalie.Boes@certisys.eu); [joy.mccracken@georgiacrop.com](mailto:joy.mccracken@georgiacrop.com); [organic@controlunion.com](mailto:organic@controlunion.com); [organic@clemson.edu](mailto:organic@clemson.edu);

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**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media

for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Johanna Phillips <Johanna.Phillips@ISDA.IDAHO.GOV>  
**Sent:** Monday, March 07, 2016 11:29 AM  
**To:** McElroy, Bridget - AMS  
**Cc:** Organics  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Please see our response below.

### **Johanna Phillips**

*Organic Program Manager*

Idaho State Department of Agriculture

Desk: (208) 332-8539

Fax: (208) 334-2170

Email: [johanna.phillips@isda.idaho.gov](mailto:johanna.phillips@isda.idaho.gov)

Website: <http://agri.idaho.gov/AGRI/Categories/PlantsInsects/Organic/indexOrganicHome.php>

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**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox  
**Sent:** Tuesday, March 01, 2016 8:12 AM  
**To:** AMS - AIAinbox  
**Cc:**  
**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **Yes- Aquaponic**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **One**

In what state or country (if international) are the certified operations located (list)? **Idaho**

What crops do these certified operations produce (list)? **Various herbs.**

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Mann, Renee - AMS on behalf of AMS - AIAinbox  
**Sent:** Friday, March 04, 2016 10:47 AM  
**To:** McElroy, Bridget - AMS  
**Cc:** Courtney, Cheri - AMS  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

FYI

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

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**From:** bolicert [mailto:bolicert@megalink.com]  
**Sent:** Friday, March 04, 2016 9:05 AM  
**To:** AMS - AIAinbox <AIAinbox@ams.usda.gov>  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Mr. or Ms.

Bolicert not certify any operator using these crop media, and it seems that Bolivia does not yet exist organic..

### **BOLIVIANA DE CERTIFICACION "BOLICERT"**

Lic. Carmen Murillo Quiroga  
ADMINISTRATIVE DIRECTOR  
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La Paz-Bolivia  
Web: [www.bolicert.org](http://www.bolicert.org)

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**De:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **En nombre de** AMS - AIAinbox  
**Enviado el:** martes, 01 de marzo de 2016 11:12  
**Para:** AMS - AIAinbox  
**CC:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); Koble, Clinton - FSA, Reno, NV; [emel.erkam@bio-inspecta.com](mailto:emel.erkam@bio-inspecta.com); [central@biolatina.com](mailto:central@biolatina.com); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); [amalia.rueda@bioagricert.org](mailto:amalia.rueda@bioagricert.org); [admin@bio-inspecta.ch](mailto:admin@bio-inspecta.ch); [central@biolatina.com](mailto:central@biolatina.com); [Pat.Kennelly@cdph.ca.gov](mailto:Pat.Kennelly@cdph.ca.gov); [info@bioagricert.org](mailto:info@bioagricert.org); [julia.winter@bio-inspecta.ch](mailto:julia.winter@bio-inspecta.ch); [accreditation@ccof.org](mailto:accreditation@ccof.org); [Bolicert@megalink.com](mailto:Bolicert@megalink.com); [riccardo.cozzo@bioagricert.org](mailto:riccardo.cozzo@bioagricert.org); [calidad@certimexsc.com](mailto:calidad@certimexsc.com); [rporto@caae.es](mailto:rporto@caae.es); [Bolicert@bolicert.org](mailto:Bolicert@bolicert.org); [tom.nizet@certisys.eu](mailto:tom.nizet@certisys.eu); [ccof@ccof.org](mailto:ccof@ccof.org); [rporto@caae.es](mailto:rporto@caae.es); [saltmn@clemson.edu](mailto:saltmn@clemson.edu); [ccpb@ccpb.it](mailto:ccpb@ccpb.it); [Danny.Lee@cdfa.ca.gov](mailto:Danny.Lee@cdfa.ca.gov); [mitchell.yergert@state.co.us](mailto:mitchell.yergert@state.co.us); [certimex@certimexsc.com](mailto:certimex@certimexsc.com); Lewin Jake-FASConatct;

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[info@pro-cert.org](mailto:info@pro-cert.org); [pedroalanda@oia.com.ar](mailto:pedroalanda@oia.com.ar); [gai@gai-inc.com](mailto:gai@gai-inc.com); [ocd@omicnet.com](mailto:ocd@omicnet.com); [qcs@qcsinfo.org](mailto:qcs@qcsinfo.org); [leslie@paorganic.org](mailto:leslie@paorganic.org); [matt.green@dem.ri.gov](mailto:matt.green@dem.ri.gov); [deborah.mansfield@primuslabs.com](mailto:deborah.mansfield@primuslabs.com); [organic@scsglobalservice.com](mailto:organic@scsglobalservice.com); [Dave.Lockman@pro-cert.org](mailto:Dave.Lockman@pro-cert.org); [Sally@Demeter-USA.org](mailto:Sally@Demeter-USA.org); [irendon@nsf.org](mailto:irendon@nsf.org); [Organic@TexasAgriculture.gov](mailto:Organic@TexasAgriculture.gov); [robin@qcsinfo.org](mailto:robin@qcsinfo.org); [\(b\) \(6\)@gmail.com](mailto:(b) (6)@gmail.com); [matt.green@dem.ri.gov](mailto:matt.green@dem.ri.gov); [rlarsen@utah.gov](mailto:rlarsen@utah.gov); [bnauman@scsglobalservices.com](mailto:bnauman@scsglobalservices.com); [Info@nofavt.org](mailto:Info@nofavt.org); [Sally@Demeter-USA.org](mailto:Sally@Demeter-USA.org); [organic@agr.wa.gov](mailto:organic@agr.wa.gov); [Mary.Holliman@texasagriculture.gov](mailto:Mary.Holliman@texasagriculture.gov); [dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org); [\(b\) \(6\)@gmail.com](mailto:(b) (6)@gmail.com); [rlarsen@utah.gov](mailto:rlarsen@utah.gov); [Nicole@nofavt.org](mailto:Nicole@nofavt.org); [bbook@agr.wa.gov](mailto:bbook@agr.wa.gov); [dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)

**Asunto:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media

for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Lori Kenyon <Lori@nofany.org>  
**Sent:** Wednesday, March 02, 2016 2:30 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? [We do not certify these type of operations](#)

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? [n/a](#)

In what state or country (if international) are the certified operations located (list)? [n/a](#)

What crops do these certified operations produce (list)? [n/a](#)

Regards,

*Lori Kenyon*, Certification Director  
NOFA-NY Certified Organic, LLC  
840 Upper Front Street- Binghamton, NY 13905  
607-724-9851 (Phone) 607-724-9853 (Fax)  
Visit our new website: [www.nofany.org](http://www.nofany.org)



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## Schurkamp, Lynnea - AMS

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**From:** Sachin Ayachit <Sachin.Ayachit@nasaa.com.au>  
**Sent:** Tuesday, March 01, 2016 5:45 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** Kirrilley Becker  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hi Bridget,

At NASAA Certified Organic (NCO) Australia, we do not certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards.

Please let me know if you have any further questions.

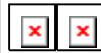
Thanks

Sachin Ayachit

**Sachin Ayachit**  
Certification Manager



**NASAA Certified Organic**  
**Address:** Unit 7, 3 Mount Barker Road, Stirling SA 5152  
PO Box 768, Stirling SA 5152  
**Phone:** +61 8 83708455  
**Email:** [sachin.ayachit@nasaa.com.au](mailto:sachin.ayachit@nasaa.com.au)  
**Website:** [www.nasaa.com.au](http://www.nasaa.com.au)



**Thinking Sustainability? Think NASAA, Australia's First Organic Certification Organisation**

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**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox  
**Sent:** Wednesday, 2 March 2016 1:42 AM  
**To:** AMS - AIAinbox <AIAinbox@ams.usda.gov>  
**Cc:** admin@abeeorganic.com; sarah@abeeorganic.com; ro@abeeorganic.com; info@ascorganic.com; Kat@ascorganic.com; mfigueiras@argencert.com.ar; americert@gmail.com; americert@gmail.com; organic@ausmeat.com.au; info@argencert.com.ar; lmontenegro@argencert.com.ar; jorge.larranaga@aco.net.au; organic@ausqual.com.au; elise@ausqual.com.au; dcox@baystateorganic.org; michael.baker@aco.net.au; michael.baker@aco.net.au; roxana.priego@biolatina.com.pe; baystateorganic@earthlink.net; Koble, Clinton - FSA, Reno, NV <clinton.koble@nv.usda.gov>; emel.erkan@bio-inspecta.com; central@biolatina.com; baystateorganic@earthlink.net; amalia.rueda@bioagricert.org; admin@bio-inspecta.ch; central@biolatina.com; Pat.Kennelly@cdph.ca.gov; info@bioagricert.org; julia.winter@bio-inspecta.ch; accreditation@ccof.org; Bolicert@megalink.com; riccardo.cozzo@bioagricert.org; calidad@certimexsc.com; rporto@caae.es; Bolicert@bolicert.org; tom.nizet@certisys.eu; ccof@ccof.org; rporto@caae.es; saltmn@clemson.edu; ccpb@ccpb.it; Danny.Lee@cdfa.ca.gov; mitchell.yergert@state.co.us; certimex@certimexsc.com; Lewin Jake-FASConatct <jake@ccof.org>; jvdschootbrugge@controlunion.com; ceres@ceres-cert.com; rsetti@ccpb.it; vincent.morel@ecocert.com; info@certisys.eu; direccionejecutiva@certimexsc.com; agroecologiauna@gmail.com; organic@clemson.edu; benzing@ceres-cert.com; mefraga@foodsafety.com.ar; amy.stafford@state.co.us; Nathalie.Boes@certisys.eu; joy.mccracken@georgiacrop.com; organic@controlunion.com; organic@clemson.edu; cvanhook77@earthlink.net; info.ecocertico@ecocert.com; amy.stafford@state.co.us; goabecky@centurylink.net; aude.bonnet@ecocert.com; dszalai@controlunion.com; camila@ibd.com.br; ep@ecoglobe.am; Jeffry.EVARD@ecocert.com; Jason.Laney@agri.idaho.gov; pdescamps@eco-logica.com; aude.bonnet@ecocert.com; Beatrice.Breuer@imo.ch; info@etko.org; nd@ecoglobe.am; Mary.nieland@iowaagriculture.gov;

foodsafety@foodsafety.com.ar; pdescamps@eco-logica.com; p.perrone@icea.info; terry.hollifield@georgiacrop.com; ma@etko.org; Kristen.Branscum@ky.gov; info@globalculture.us; calidad@foodsafety.com.ar; herr@bcs-oeko.de; goaorg@centurylink.net; terry.hollifield@georgiacrop.com; a.moutapam@lacon-institut.org; lbd@lbd.com.br; globalculture@earthlink.net; monica@letis.org; Johanna.Phillips@agri.idaho.gov; goaorg@centurylink.net; scarlsen@co.marin.ca.us; imo@imo.ch; gwendal@ibd.com.br; juanantonio.mendoza@mayacert.com; info@ics-intl.com; Johanna.Phillips@agri.idaho.gov; spwalker@mosaorganic.org; maury.wills@iowaagriculture.gov; soh@imo.ch; wippl001@umn.edu; nop@icea.info; dawn@ics-intl.com; knewkirk@mofga.org; adam.watson@ky.gov; maury.wills@iowaagriculture.gov; etyanich@mt.gov; info@bcs-oeko.de; nop@icea.info; CarltonN@co.monterey.ca.us; lacon@lacon-institut.org; adam.watson@ky.gov; Kirrilley Becker <Kirrilley.Becker@nasaa.com.au>; letis@letis.org; fischer@bcs-oeko.de; cfanta@naturesinternational.com; jstiles@marincounty.org; j.kopp@lacon-institut.org; jabbott@agri.nv.gov; FGIS OA, Maryland <Deanna.Baldwin@maryland.gov>; internacional@letis.org; Victoria.Smith@agr.nh.gov; info@mayacert.com; jstiles@marincounty.org; Daniel.wunderlich@ag.state.nj.us; mosa@mosaorganic.org; FGIS OA, Maryland <Deanna.Baldwin@maryland.gov>; SGERK@nmda.nmsu.edu; mncia@mncia.org; noe.rivera@mayacert.com; lisaengelbert@nofany.org; certification@mofga.org; cskolaski@mosaorganic.org; Bryan.Buchwald@ag.ok.gov; agrorganic@mt.gov; michelle.menken@mncia.org; leng@oda.state.or.us; agcomm@co.monterey.ca.us; yurlina@mofga.org; abrewster@ocia.org; Sachin Ayachit <Sachin.Ayachit@nasaa.com.au>; gwebster@mt.gov; gestiondecalidad@oia.com.ar; nfccertification@gmail.com; Huntinggb@co.monterey.ca.us; hi.yoshida@omicnet.com; nics@naturesinternational.com; Sachin Ayachit <Sachin.Ayachit@nasaa.com.au>; kyla@paorganic.org; Jennifer.Gornnert@agr.nh.gov; nfccertification@gmail.com; brian.mansfield@primuslabs.com; erich.bremer@ag.state.nj.us; dave@naturesinternational.com; byron.hamm@pro-cert.org; organic@nmda.nmsu.edu; ajepson@agri.nv.gov; thughes@nsf.org; certifiedorganic@nofany.org; Jennifer.Gornnert@agr.nh.gov; ram@qcsinfo.org; organic@oeffa.org; erich.bremer@ag.state.nj.us; dkirsanovaphillips@scscertified.com; jeff.stearns@ag.ok.gov; bbakker@nmda.nmsu.edu; rhougaard@utah.gov; info@oncert.com; lori@nofany.org; Laura@nofavt.org; cid-organic@oda.state.or.us; andy@oeffa.org; srice@agr.wa.gov; organic@tilth.org; jeff.stearns@ag.ok.gov; john.young@yolocounty.org; info@occert.com; sam@oncert.com; xiao@ofdc.org.cn; kallen@oda.state.or.us; oia@oia.com.ar; connie@tilth.org; ocd@omicnet.com; susan@occert.com; pco@paorganic.org; celder@ocia.org; PrimusOrganic@primuslabs.com; xiao@ofdc.org.cn; info@pro-cert.org; pedroalanda@oia.com.ar; qai@qai-inc.com; ocd@omicnet.com; qcs@qcsinfo.org; leslie@paorganic.org; matt.green@dem.ri.gov; deborah.mansfield@primuslabs.com; organic@scsglobalservice.com; Dave.Lockman@pro-cert.org; Sally@Demeter-USA.org; irendon@nsf.org; Organic@TexasAgriculture.gov; robin@qcsinfo.org; (b) (6) @gmail.com; matt.green@dem.ri.gov; rlarsen@utah.gov; bnauman@scsglobalservices.com; Info@nofavt.org; Sally@Demeter-USA.org; organic@agr.wa.gov; Mary.Holliman@texasagriculture.gov; dennis.chambers@yolocounty.org; (b) (6) @gmail.com; rlarsen@utah.gov; Nicole@nofavt.org; bbook@agr.wa.gov; dennis.chambers@yolocounty.org

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

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In what state or country (if international) are the certified operations located (list)?

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Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** DPI Clemson University <organic@clemson.edu>  
**Sent:** Tuesday, March 01, 2016 10:41 AM  
**To:** McElroy, Bridget - AMS  
**Cc:** saltmn@clemson.edu; Sandra Verderame  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hi Bridget,  
Clemson does not currently certify any hydroponic, aeroponic, or associated production systems.

Ryan Merck  
Clemson University  
Organic Certification Program  
511 Westinghouse Road  
Pendleton, SC 29670  
864.646.2129 OFFICE  
(b) (6) MOBILE  
864.646.2178 FAX  
[www.clemson.edu/organic](http://www.clemson.edu/organic)



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**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

[bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov)

## Schurkamp, Lynnea - AMS

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**From:** Mann, Renee - AMS  
**Sent:** Tuesday, March 01, 2016 10:35 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

FYI

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

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**From:** Baron , Anne - AMS  
**Sent:** Tuesday, March 01, 2016 10:29 AM  
**To:** Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>; Crail, Lars - AMS <Lars.Crail@ams.usda.gov>; Gebault King, ReneeA - AMS <ReneeA.GebaultKing@ams.usda.gov>; Lopez, JasonJ - AMS <JasonJ.Lopez@ams.usda.gov>; Lusby, MaryLou - AMS <MaryLou.Lusby@ams.usda.gov>; Mann, Renee - AMS <Renee.Mann@ams.usda.gov>; Yang, RobertH - AMS <RobertH.Yang@ams.usda.gov>; Zuck, Penelope - AMS <Penelope.Zuck@ams.usda.gov>; Adams, Edith - AMS <Edith.Adams@ams.usda.gov>; Caceres, Miguel - AMS <Miguel.Caceres@ams.usda.gov>; Friesenhahn, Martin - AMS <Martin.Friesenhahn@ams.usda.gov>; Gilbert, Corey - AMS <Corey.Gilbert@ams.usda.gov>; Heckart, Patricia - AMS <Patricia.Heckart@ams.usda.gov>; Hildreth, David - AMS <David.Hildreth@ams.usda.gov>; Horne, Willy - AMS <Willy.Horne@ams.usda.gov>; Kohles, Alan - AMS <Alan.Kohles@ams.usda.gov>; Lopez, Mike - AMS <Mike.Lopez@ams.usda.gov>; Matejovsky, Kathryn - AMS <Kathryn.Matejovsky@ams.usda.gov>; Ross, Steve - AMS <Steve.Ross@ams.usda.gov>; Schoop, Jamie - AMS <Jamie.Schoop@ams.usda.gov>; Skinner, Rick - AMS <Rick.Skinner@ams.usda.gov>; Wilson, Darrell - AMS <Darrell.Wilson@ams.usda.gov>; Gebel, Kelley - AMS <Kelley.Gebel@ams.usda.gov>; McEvoy, Miles - AMS <Miles.McEvoy@ams.usda.gov>; Tucker, Jennifer - AMS <Jennifer.Tucker@ams.usda.gov>; Nelson, Kristen - AMS <Kristen.Nelson@ams.usda.gov>; Lewis, Paul I - AMS <Paull.Lewis@ams.usda.gov>; Holmes, Vella - AMS <Vella.Holmes@ams.usda.gov>; Michael, Matthew - AMS <Matthew.Michael@ams.usda.gov>; andy@oeffa.org  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear AIA staff, NOP Management Team and QAD auditors,

Please find below the message sent to the certifiers.  
Let us know if you have any questions.

Regards,  
Alvik Joseph

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**From:** Baron , Anne - AMS **On Behalf Of** AMS - AIAinbox  
**Sent:** Tuesday, March 01, 2016 10:12 AM  
**To:** AMS - AIAinbox <AIAinbox@ams.usda.gov>  
**Cc:** 'admin@abeeorganic.com' <admin@abeeorganic.com>; 'sarah@abeeorganic.com' <sarah@abeeorganic.com>; 'ro@abeeorganic.com' <ro@abeeorganic.com>; 'info@ascorganic.com' <info@ascorganic.com>; 'Kat@ascorganic.com' <Kat@ascorganic.com>; 'mfigueiras@argencert.com.ar' <mfigueiras@argencert.com.ar>; 'americert@gmail.com' <americert@gmail.com>; 'americert@gmail.com' <americert@gmail.com>; 'organic@ausmeat.com.au' <organic@ausmeat.com.au>; 'info@argencert.com.ar' <info@argencert.com.ar>; 'lmontenegro@argencert.com.ar'



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**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems



This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

## Schurkamp, Lynnea - AMS

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**From:** Rendon, Iris <irendon@gftc.ca>  
**Sent:** Thursday, March 10, 2016 4:12 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**Attachments:** Greenhouse Operators for NOP.xlsx

Hello,

I had submitted a response to this inquiry earlier, however, some corrections have been made by the technical team. Please accept this response and disregard the previous email on this subject.  
Thank you and best regards.

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **Yes**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **Eight, however, please see attachment with comments. You may arrive at a different conclusion.**

In what state or country (if international) are the certified operations located (list)? **See attached.**

What crops do these certified operations produce (list)? **See attached.**

### **Iris Rendon**

Quality Specialist  
NSF International - Canada  
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**From:** Baron, Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **On Behalf Of** AMS - AIAinbox  
**Sent:** March-01-16 10:12 AM  
**To:** AMS - AIAinbox  
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[jeff.stearns@ag.ok.gov](mailto:jeff.stearns@ag.ok.gov); [bbakker@nmda.nmsu.edu](mailto:bbakker@nmda.nmsu.edu); [rhougaard@utah.gov](mailto:rhougaard@utah.gov); [info@onecert.com](mailto:info@onecert.com); [lori@nofany.org](mailto:lori@nofany.org); [Laura@nofavt.org](mailto:Laura@nofavt.org); [cid-organic@oda.state.or.us](mailto:cid-organic@oda.state.or.us); [andy@oeffa.org](mailto:andy@oeffa.org); [srice@agr.wa.gov](mailto:srice@agr.wa.gov); [organic@tilth.org](mailto:organic@tilth.org); [jeff.stearns@ag.ok.gov](mailto:jeff.stearns@ag.ok.gov); [john.young@yolocounty.org](mailto:john.young@yolocounty.org); [info@occert.com](mailto:info@occert.com); [sam@onecert.com](mailto:sam@onecert.com); [xiao@ofdc.org.cn](mailto:xiao@ofdc.org.cn); [kallen@oda.state.or.us](mailto:kallen@oda.state.or.us); [oia@oia.com.ar](mailto:oia@oia.com.ar); [connie@tilth.org](mailto:connie@tilth.org); [ocd@omicnet.com](mailto:ocd@omicnet.com); [susan@occert.com](mailto:susan@occert.com); [pco@paorganic.org](mailto:pco@paorganic.org); [celder@ocia.org](mailto:celder@ocia.org); [PrimusOrganic@primuslabs.com](mailto:PrimusOrganic@primuslabs.com); [xiao@ofdc.org.cn](mailto:xiao@ofdc.org.cn); [info@pro-cert.org](mailto:info@pro-cert.org); [pedroalanda@oia.com.ar](mailto:pedroalanda@oia.com.ar); QAI 2; [ocd@omicnet.com](mailto:ocd@omicnet.com); [qcs@qcsinfo.org](mailto:qcs@qcsinfo.org); [leslie@paorganic.org](mailto:leslie@paorganic.org); [matt.green@dem.ri.gov](mailto:matt.green@dem.ri.gov); [deborah.mansfield@primuslabs.com](mailto:deborah.mansfield@primuslabs.com); [organic@scsglobalservice.com](mailto:organic@scsglobalservice.com); [Dave.Lockman@pro-cert.org](mailto:Dave.Lockman@pro-cert.org); [Sally@Demeter-USA.org](mailto:Sally@Demeter-USA.org); Rendon, Iris; [Organic@TexasAgriculture.gov](mailto:Organic@TexasAgriculture.gov); [robin@qcsinfo.org](mailto:robin@qcsinfo.org); (b) (6) @gmail.com; [matt.green@dem.ri.gov](mailto:matt.green@dem.ri.gov); [rlarsen@utah.gov](mailto:rlarsen@utah.gov); [bnauman@scsglobalservices.com](mailto:bnauman@scsglobalservices.com); [Info@nofavt.org](mailto:Info@nofavt.org); [Sally@Demeter-USA.org](mailto:Sally@Demeter-USA.org); [organic@agr.wa.gov](mailto:organic@agr.wa.gov); [Mary.Holliman@texasagriculture.gov](mailto:Mary.Holliman@texasagriculture.gov); [dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org); (b) (6) @gmail.com; [rlarsen@utah.gov](mailto:rlarsen@utah.gov); [Nicole@nofavt.org](mailto:Nicole@nofavt.org); [bbook@agr.wa.gov](mailto:bbook@agr.wa.gov); [dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Ashley P. Jeppson <ajeppson@agri.nv.gov>  
**Sent:** Wednesday, March 16, 2016 8:04 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** FW: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget,

The Nevada Department of Agriculture does not certify organic any hydroponic, Aquaponic, or aeroponic operations.



### Ashley Jeppson

Agriculturist | Plant Industry Division | Nevada Department of Agriculture  
405 South 21st Street, Sparks, NV 89431

Office: 775.353.3675 | Fax: 775.353.3638

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**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox  
**Sent:** Wednesday, March 16, 2016 12:30 PM  
**To:** AMS - AIAinbox <AIAinbox@ams.usda.gov>  
**Subject:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

\*\*\*Original Message\*\*\*

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both

systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **No**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

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**From:** Mann, Renee - AMS on behalf of AMS - AIAinbox  
**Sent:** Wednesday, March 16, 2016 4:12 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** FW: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

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**From:** Katherine Borchard [mailto:kate@ascorganic.com]  
**Sent:** Wednesday, March 16, 2016 4:02 PM  
**To:** AMS - AIAinbox <AIAinbox@ams.usda.gov>  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

ASCO already submitted this information on the 12<sup>th</sup> of March.

Thank you

Katherine Borchard, ASCO Program Director

Agricultural Services Certified Organic  
PO Box 4871, Salinas, CA. 93912  
P: 831.449.6365 F: 831.975.4414



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**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox  
**Sent:** Wednesday, March 16, 2016 12:30 PM  
**To:** AMS - AIAinbox  
**Subject:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

\*\*\*Original Message\*\*\*

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

#### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

#### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

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**From:** Mann, Renee - AMS  
**Sent:** Wednesday, March 16, 2016 3:45 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** FW: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hi Bridget,  
This message just went out. FYI. I hope you get some more responses!  
-RM

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

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**From:** Baron , Anne - AMS  
**Sent:** Wednesday, March 16, 2016 3:32 PM  
**To:** Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>; Crail, Lars - AMS <Lars.Crail@ams.usda.gov>; Gebault King, ReneeA - AMS <ReneeA.GebaultKing@ams.usda.gov>; Lopez, JasonJ - AMS <JasonJ.Lopez@ams.usda.gov>; Mann, Renee - AMS <Renee.Mann@ams.usda.gov>; Yang, RobertH - AMS <RobertH.Yang@ams.usda.gov>; Zuck, Penelope - AMS <Penelope.Zuck@ams.usda.gov>; Adams, Edith - AMS <Edith.Adams@ams.usda.gov>; Caceres, Miguel - AMS <Miguel.Caceres@ams.usda.gov>; Friesenhahn, Martin - AMS <Martin.Friesenhahn@ams.usda.gov>; Gilbert, Corey - AMS <Corey.Gilbert@ams.usda.gov>; Heckart, Patricia - AMS <Patricia.Heckart@ams.usda.gov>; Hildreth, David - AMS <David.Hildreth@ams.usda.gov>; Horne, Willy - AMS <Willy.Horne@ams.usda.gov>; Kohles, Alan - AMS <Alan.Kohles@ams.usda.gov>; Lopez, Mike - AMS <Mike.Lopez@ams.usda.gov>; Matejovsky, Kathryn - AMS <Kathryn.Matejovsky@ams.usda.gov>; Ross, Steve - AMS <Steve.Ross@ams.usda.gov>; Schoop, Jamie - AMS <Jamie.Schoop@ams.usda.gov>; Skinner, Rick - AMS <Rick.Skinner@ams.usda.gov>; Wilson, Darrell - AMS <Darrell.Wilson@ams.usda.gov>; Gebel, Kelley - AMS <Kelley.Gebel@ams.usda.gov>; McEvoy, Miles - AMS <Miles.McEvoy@ams.usda.gov>; Tucker, Jennifer - AMS <Jennifer.Tucker@ams.usda.gov>; Nelson, Kristen - AMS <Kristen.Nelson@ams.usda.gov>; Lewis, Paul I - AMS <Paull.Lewis@ams.usda.gov>; Holmes, Vella - AMS <Vella.Holmes@ams.usda.gov>; Michael, Matthew - AMS <Matthew.Michael@ams.usda.gov>; andy@oeffa.org  
**Subject:** FW: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear AIA staff, NOP Management Team and QAD auditors,

Please find below the reminder message sent to the certifiers.  
Let us know if you have any questions.

Regards,  
Alvik Joseph

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**From:** Baron , Anne - AMS **On Behalf Of** AMS - AIAinbox  
**Sent:** Wednesday, March 16, 2016 3:30 PM  
**To:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>  
**Subject:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

\*\*\*Original Message\*\*\*

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

#### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

#### **Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

## Schurkamp, Lynnea - AMS

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**From:** Mann, Renee - AMS on behalf of AMS - AIAinbox  
**Sent:** Tuesday, March 22, 2016 8:34 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** FW: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

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**From:** Betty Kananen [mailto:[goaorg@centurylink.net](mailto:goaorg@centurylink.net)]  
**Sent:** Friday, March 18, 2016 6:43 AM  
**To:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Global Organic alliance, Inc has not certified any entities for hydroponic, aquaponics, aeroponic in 2015.

Sincerely,

Betty Kananen  
President/CEO  
Global Organic Alliance  
[goaorg@centurylink.net](mailto:goaorg@centurylink.net)  
Facebook: [www.facebook.com/goainc](http://www.facebook.com/goainc)  
Phone – 937.593.1232  
Fax – 937.593.9507

---

**From:** Baron , Anne - AMS [mailto:[AnneP.Baron@ams.usda.gov](mailto:AnneP.Baron@ams.usda.gov)] **On Behalf Of** AMS - AIAinbox  
**Sent:** Wednesday, March 16, 2016 3:30 PM  
**To:** AMS - AIAinbox  
**Subject:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

\*\*\*Original Message\*\*\*

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

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**From:** Sam Welsch <sam@onecert.com>  
**Sent:** Thursday, March 03, 2016 6:54 AM  
**To:** McElroy, Bridget - AMS  
**Cc:** OneCert Info  
**Subject:** Fwd: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Bridget,

As you are already aware, OneCert does not certify hydroponic, aeroponic or aquaponic operations.

How soon after March 11 do you expect to have a summary of this information available to the hydroponics task force?

Thanks,

Sam Welsch, President  
OneCert, Inc.  
2219 C Street  
Lincoln, NE 68502  
402-420-6080  
[www.onecert.com](http://www.onecert.com)

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----- Forwarded message -----

**From:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>  
**Date:** Tue, Mar 1, 2016 at 9:11 AM  
**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**To:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>  
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"[robin@qcsinfo.org](mailto:robin@qcsinfo.org)" <[robin@qcsinfo.org](mailto:robin@qcsinfo.org)>, "[\(b\) \(6\)@gmail.com](mailto:(b) (6)@gmail.com)" <[\(b\) \(6\)@gmail.com](mailto:(b) (6)@gmail.com)>, "[rlarsen@utah.gov](mailto:rlarsen@utah.gov)" <[rlarsen@utah.gov](mailto:rlarsen@utah.gov)>, "[bnauman@scsglobalservices.com](mailto:bnauman@scsglobalservices.com)" <[bnauman@scsglobalservices.com](mailto:bnauman@scsglobalservices.com)>, "[Info@nofavt.org](mailto:Info@nofavt.org)" <[Info@nofavt.org](mailto:Info@nofavt.org)>, "[organic@agr.wa.gov](mailto:organic@agr.wa.gov)" <[organic@agr.wa.gov](mailto:organic@agr.wa.gov)>, "[Mary.Holliman@texasagriculture.gov](mailto:Mary.Holliman@texasagriculture.gov)" <[Mary.Holliman@texasagriculture.gov](mailto:Mary.Holliman@texasagriculture.gov)>, "[dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)" <[dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)>, "[Nicole@nofavt.org](mailto:Nicole@nofavt.org)" <[Nicole@nofavt.org](mailto:Nicole@nofavt.org)>, "[bbook@agr.wa.gov](mailto:bbook@agr.wa.gov)" <[bbook@agr.wa.gov](mailto:bbook@agr.wa.gov)>

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.



## What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

## Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,

Cheri Courtney

Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Jeanne Gonzales <jeanne.gonzales@georgiacrop.com>  
**Sent:** Tuesday, March 08, 2016 12:33 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** GEORGIA CROP IMPROVEMENT ASSOCIATION RE: HYDROPONICS, AQUAPONICS, ETC.

Hello Bridget,

Georgia Crop Improvement Association currently does not certify Hydroponics, Aquaponics, or Aeroponics. We would certify Hydroponics if asked.

Regards,

*Jeanne C. Gonzales*

Organic Administrative Assistant  
Georgia Crop Improvement Association Organic Certification Program

**GCIAOCP**

2425 S. Milledge Avenue

Athens, Georgia 30605

Phone: 706-542-2351

Fax: 706-542-9397

Email: [jeanne.gonzales@georgiacrop.com](mailto:jeanne.gonzales@georgiacrop.com)

Website: [www.georgiacrop.com](http://www.georgiacrop.com)

## Schurkamp, Lynnea - AMS

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**From:** Global Culture - Linda Van Hook <Linda@globalculture.us>  
**Sent:** Tuesday, March 22, 2016 4:07 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** Global Culture responses to Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget,

Please find Global Culture's answers to your questions, below, marked in Blue.

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **No, Global Culture does not.**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **Not Applicable**

In what state or country (if international) are the certified operations located (list)? **Not Applicable**

What crops do these certified operations produce (list)? **Not Applicable**

Please let us know if you have any further questions.

Kind Regards,

Linda Van Hook  
Global Culture  
315 Meigs Road, Ste. A-404  
Santa Barbara, CA 93109  
Tel (707) 464-6913, Fax (888) 493-7818  
Linda@globalculture.us

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<b>Operator</b>	<b>Country</b>	<b>Hydroponic Yes/No?</b>	<b>Products</b>
Operator 1	Mexico	Yes	Transplants
Operator 2	Mexico	Yes	Bell Peppers and Tomatoes.
Operator 3	United States	Yes	Endive
Operator 4	Mexico	Yes	Tomatoes
Operator 5	United States	No	Mixed Vegetable
Operator 6	Mexico	No	Cucumbers
Operator 7	United States	No	Mung and Soybean Sprouts
Operator 8	Mexico	No	Tomatoes
Operator 9	Mexico	No	Tomatoes
Operator 10	United States	No	Tomatoes
Operator 11	United States	No	Mixed Vegetable
Operator 12	United States	No	Microgreens
Operator 13	United States	Yes	Transplants
Operator 14	United States	Yes	Transplants
Operator 15	United States	Yes	Transplants
Operator 16	United States	Yes	Tomatoes

Comments

(b) (4)

[Redacted content]


c Plant Food.

a.	



## Schurkamp, Lynnea - AMS

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**From:** Stafford - CDA, Amy <amy.stafford@state.co.us>  
**Sent:** Thursday, March 17, 2016 5:34 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** Hydroponic, Aeroponic, and Aquaponic Production

Dear Ms. McElroy,

CDA does not certify any hydroponic, aeroponic or aquaponic operations. It is our internal policy to not certify such operations as we do not have the technical expertise on our staff to handle such clients.

Please let me know if you have any additional questions.

Best regards,

Amy Stafford  
Organic Program Manager



P 303.869.9074 | F 303.466-2860  
305 Interlocken Parkway, Broomfield, CO 80021  
[amy.stafford@state.co.us](mailto:amy.stafford@state.co.us) | [www.colorado.gov/ag](http://www.colorado.gov/ag)

## Schurkamp, Lynnea - AMS

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**From:** Green, Matt (DEM) <matt.green@dem.ri.gov>  
**Sent:** Tuesday, March 01, 2016 2:35 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** hydroponic, aeroponic or aquaponic

Hello, RIDEM has not certified any of these operations; we have not received any applications requesting certification of these types of systems.

Thank you.

Matt Green  
Environmental Scientist, Plant Industry Section  
Rhode Island DEM, Division of Agriculture  
Tel: 401-222-2781 ext. 4516  
Fax: 401-222-6047  
[matt.green@dem.ri.gov](mailto:matt.green@dem.ri.gov) [www.rigrown.ri.gov](http://www.rigrown.ri.gov)

## Schurkamp, Lynnea - AMS

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**From:** Calidad <calidad@certimexsc.com>  
**Sent:** Tuesday, March 01, 2016 10:54 AM  
**To:** McElroy, Bridget - AMS  
**Cc:** calidad2@certimexsc.com  
**Subject:** Hydroponic, aeroponic or aquaponic

Dear Ms Bridget:

We are writing to inform that CERTIMEX is not certifying hydroponic, aeroponic or aquaponics operations.

Best regards.

Juan Felipe Ortega Valdez  
Resp. de Calidad  
Usuario Skype: calidad.cmx  
CERTIMEX, Certificadora Mexicana de Productos y Procesos Ecológicos, S. C.  
Calle 16 de Septiembre No. 204, Ejido Guadalupe Victoria,  
Oaxaca de Juárez, Oax., México. C. P. 68026  
Tel. / Fax. ++ 951 5202687 / ++ 951 52 00617/ ++951 1336113  
Email. Gral. [certimex@certimexsc.com](mailto:certimex@certimexsc.com)  
Pag. Web: [www.certimexsc.com](http://www.certimexsc.com)

Horarios de Atención:  
Lunes a Viernes  
9: 00 a.m. a 14:00 p.m.  
15:00 p.m. a 17:00 p.m.

Acreditada

1. ISO-IEC 17065 (EN 45011) por el organismo Alemán de Acreditación DAkkS para certificar productos orgánicos para el mercado Nacional y Europa.
2. Departamento de Agricultura de los Estados Unidos (USDA-NOP) para certificar productos Orgánicos para el Mercado de Estados Unidos y Canadá.
3. MAFF-JAS (Ministerio de Agricultura, Silvicultura y Pesca) para certificar productos orgánicos para el mercado Japonés.
4. SAGARPA-SENASICA (Lineamientos para la Operación Orgánica de las Actividades Agropecuarias) para certificar productos orgánicos para el Mercado Nacional.
5. FUNDEPPO (SPP - Símbolo de Pequeños Productores) para el Mercado de Comercio Justo.

## Schurkamp, Lynnea - AMS

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**From:** Winter Julia <julia.winter@bio-inspecta.ch>  
**Sent:** Thursday, March 03, 2016 2:29 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** Hydroponic, Aeroponic...

Dear Mrs Mc Elroy,

bio.inspecta AG, Switzerland doesn't certify hydroponic, aeroponic or aquaponic operations.

Kind regards,

Julia Winter

**bio.inspecta AG**

Department Processing and Trade

Tel +41 62 865 63 24

Fax +41 62 865 63 01

[julia.winter@bio-inspecta.ch](mailto:julia.winter@bio-inspecta.ch)

[www.bio-inspecta.ch](http://www.bio-inspecta.ch)



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[lebensmitteltag.ch](http://lebensmitteltag.ch)

## Schurkamp, Lynnea - AMS

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**From:** Dennis Chambers <Dennis.Chambers@yolocounty.org>  
**Sent:** Wednesday, March 02, 2016 11:17 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** Hydroponic, aguaponic, aeroponic

Bridget,

Yolo County Organic Agriculture currently has no clients who grow excluding soil.

Dennis Chambers  
Chief Deputy Commissioner  
Yolo County Department of Agriculture

## Schurkamp, Lynnea - AMS

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**From:** Gwendal Bellocq - IBD Certificações <gwendal@ibd.com.br>  
**Sent:** Tuesday, March 01, 2016 11:59 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production System\_01032016

Dear Bridget McElroy,

As requested please see IBD's answer below:

- Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **NO.**
- If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **NONE**
- In what state or country (if international) are the certified operations located (list)? **NO ONE**
- What crops do these certified operations produce (list)? **NONE**

I remain at your service for any further question you may have.

Best regards.

Gwendal Bellocq  
Gerente Geral de Certificação / General Manager

FONE: +55(14)38119800 / FAX: +55(14)38119801

[ibd@ibd.com.br](mailto:ibd@ibd.com.br) [www.ibd.com.br](http://www.ibd.com.br)

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BIODYNAMIC AND ORGANIC PRODUCTS- FEED THIS IDEA

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**De:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **Em nome de** AMS - AIAinbox

**Enviada em:** terça-feira, 1 de março de 2016 12:12

**Para:** AMS - AIAinbox

**Cc:** admin@abeeorganic.com; sarah@abeeorganic.com; ro@abeeorganic.com; info@ascorganic.com; Kat@ascorganic.com; mfigueiras@argencert.com.ar; americert@gmail.com; americert@gmail.com; organic@ausmeat.com.au; info@argencert.com.ar; lmontenegro@argencert.com.ar; jorge.larranaga@aco.net.au; organic@ausqual.com.au; elise@ausqual.com.au; dcox@baystateorganic.org; michael.baker@aco.net.au; michael.baker@aco.net.au; roxana.priego@biolatina.com.pe; baystateorganic@earthlink.net; Koble, Clinton - FSA, Reno, NV; emel.erkan@bio-inspecta.com; central@biolatina.com; baystateorganic@earthlink.net; amalia.rueda@bioagricert.org; admin@bio-inspecta.ch; central@biolatina.com; Pat.Kennelly@cdph.ca.gov; info@bioagricert.org; julia.winter@bio-inspecta.ch; accreditation@ccof.org; Bolicert@megalink.com; riccardo.cozzo@bioagricert.org; calidad@certimexsc.com; rporto@caae.es; Bolicert@bolicert.org; tom.nizet@certisys.eu; ccof@ccof.org; rporto@caae.es; saltmn@clemson.edu; ccpb@ccpb.it; Danny.Lee@cdfa.ca.gov; mitchell.yergert@state.co.us; certimex@certimexsc.com; Lewin Jake-FASConatct; jvdschootbrugge@controlunion.com; ceres@ceres-cert.com; rsetti@ccpb.it; vincent.morel@ecocert.com; info@certisys.eu; direccionejecutiva@certimexsc.com; agroecologiauna@gmail.com; organic@clemson.edu; benzing@ceres-cert.com; mefraga@foodsafety.com.ar; amy.stafford@state.co.us; Nathalie.Boes@certisys.eu; joy.mccracken@georgiacrop.com; organic@controlunion.com; organic@clemson.edu; cvanhook77@earthlink.net; info.ecocertico@ecocert.com; amy.stafford@state.co.us; goabecky@centurylink.net; aude.bonnet@ecocert.com; dszalai@controlunion.com; camila@ibd.com.br; ep@ecoglobe.am; Jeffry.EVARD@ecocert.com; Jason.Laney@agri.idaho.gov; pdescamps@eco-logica.com; aude.bonnet@ecocert.com; Beatrice.Breuer@imo.ch; info@etko.org; nd@ecoglobe.am; Mary.nieland@iowaagriculture.gov; foodsafety@foodsafety.com.ar; pdescamps@eco-logica.com; p.perrone@icea.info; terry.hollifield@georgiacrop.com; ma@etko.org; Kristen.Branscum@ky.gov; info@globalculture.us; calidad@foodsafety.com.ar; herr@bcs-oeko.de; goaorg@centurylink.net; terry.hollifield@georgiacrop.com; a.moutapam@lacon-institut.org; lbd@lbd.com.br; globalculture@earthlink.net; monica@letis.org; Johanna.Phillips@agri.idaho.gov; goaorg@centurylink.net; scarlsen@co.marin.ca.us; imo@imo.ch; gwendal@ibd.com.br; juanantonio.mendoza@mayacert.com; info@ics-intl.com; Johanna.Phillips@agri.idaho.gov; spwalker@mosaorganic.org; maury.wills@iowaagriculture.gov; soh@imo.ch; wippl001@umn.edu; nop@icea.info; dawn@ics-intl.com; knewkirk@mofga.org; adam.watson@ky.gov; maury.wills@iowaagriculture.gov; etyanich@mt.gov; info@bcs-oeko.de; nop@icea.info; CarltonN@co.monterey.ca.us; lacon@lacon-institut.org; adam.watson@ky.gov; kirriley.becker@nasaa.com.au; letis@letis.org; fischer@bcs-oeko.de; cfanta@naturesinternational.com;

jstiles@marincounty.org; j.kopp@lacon-institut.org; jabbott@agri.nv.gov; FGIS OA, Maryland; internacional@letis.org; Victoria.Smith@agr.nh.gov; info@mayacert.com; jstiles@marincounty.org; Daniel.wunderlich@ag.state.nj.us; mosa@mosaorganic.org; FGIS OA, Maryland; SGERK@nmda.nmsu.edu; mncia@mncia.org; noe.rivera@mayacert.com; lisaengelbert@nofany.org; certification@mofga.org; cskolaski@mosaorganic.org; Bryan.Buchwald@ag.ok.gov; agrorganic@mt.gov; michelle.menken@mncia.org; leng@oda.state.or.us; agcomm@co.monterey.ca.us; yurlina@mofga.org; abrewster@ocia.org; sachin.ayachit@nasaa.com.au; gwebster@mt.gov; gestiondecalidad@oia.com.ar; nfccertification@gmail.com; Huntinggb@co.monterey.ca.us; hi.yoshida@omicnet.com; nics@naturesinternational.com; sachin.ayachit@nasaa.com.au; kyla@paorganic.org; Jennifer.Gornnert@agr.nh.gov; nfccertification@gmail.com; brian.mansfield@primuslabs.com; erich.bremer@ag.state.nj.us; dave@naturesinternational.com; byron.hamm@pro-cert.org; organic@nmda.nmsu.edu; ajeppson@agri.nv.gov; thughes@nsf.org; certifiedorganic@nofany.org; Jennifer.Gornnert@agr.nh.gov; ram@qcsinfo.org; organic@oeffa.org; erich.bremer@ag.state.nj.us; dkirsanovaphillips@scscertified.com; jeff.stearns@ag.ok.gov; bbakker@nmda.nmsu.edu; rhougaard@utah.gov; info@onecert.com; lori@nofany.org; Laura@nofavt.org; cid-organic@oda.state.or.us; andy@oeffa.org; srice@agr.wa.gov; organic@tilth.org; jeff.stearns@ag.ok.gov; john.young@yolocounty.org; info@occert.com; sam@onecert.com; xiao@ofdc.org.cn; kallen@oda.state.or.us; oia@oia.com.ar; connie@tilth.org; ocd@omicnet.com; susan@occert.com; pco@paorganic.org; celder@ocia.org; PrimusOrganic@primuslabs.com; xiao@ofdc.org.cn; info@pro-cert.org; pedroalanda@oia.com.ar; qai@qai-inc.com; ocd@omicnet.com; qcs@qcsinfo.org; leslie@paorganic.org; matt.green@dem.ri.gov; deborah.mansfield@primuslabs.com; organic@scsglobalservice.com; Dave.Lockman@pro-cert.org; Sally@Demeter-USA.org; irendon@nsf.org; Organic@TexasAgriculture.gov; robin@qcsinfo.org; (b) (6) @gmail.com; matt.green@dem.ri.gov; rlarsen@utah.gov; bnauman@scsglobalservices.com; Info@nofavt.org; Sally@Demeter-USA.org; organic@agr.wa.gov; Mary.Holliman@texasagriculture.gov; dennis.chambers@yolocounty.org; (b) (6) @gmail.com; rlarsen@utah.gov; Nicole@nofavt.org; bbook@agr.wa.gov; dennis.chambers@yolocounty.org

**Assunto:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

#### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

#### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?



If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Stiles, Jeffrey <JStiles@marincounty.org>  
**Sent:** Thursday, March 17, 2016 10:53 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems - MOCA

Good Day Bridget,

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **No.**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **N/A.**

In what state or country (if international) are the certified operations located (list)? **N/A.**

What crops do these certified operations produce (list)? **N/A.**

Best Regards,



.....

**Jeffrey Stiles**  
INSPECTOR

County of Marin  
Department of Agriculture, Weights and Measures  
1682 Novato Boulevard, Suite 150-A  
Novato, CA 94947  
415 473 6700 T  
415 473 7543 F  
CRS Dial 711  
[JStiles@marincounty.org](mailto:JStiles@marincounty.org)

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## Schurkamp, Lynnea - AMS

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**From:** Jenni Flood <Jenni.Flood@ausmeat.com.au> on behalf of Organic <organic@ausmeat.com.au>  
**Sent:** Tuesday, March 01, 2016 7:32 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** Organic  
**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Good morning Bridget

How are you? Please find following our responses in regards to the email sent by Cheri Courtney.

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

*AUS-QUAL has not in the past, or currently has any operators requesting Certification for hydroponic, aeroponic or aquaponic*

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

*Nil operations currently*

In what state or country (if international) are the certified operations located (list)?

*N/A*

What crops do these certified operations produce (list)?

*N/A*

If you require any further information please do not hesitate to contact us.

Kind regards

### **Jenni Flood**

Admin-Support Officer – Organic Program  
AUS-QUAL Pty Ltd

Ph 07 3361 9219 | Fax 07 3361 9222 | Freecall 1800 630 890  
Unit 1 / 333 Queensport Road North, Murarrie, Qld, 4172 | PO Box 3403, Tingalpa, Qld, 4173.  
Websites [www.ausqual.com.au](http://www.ausqual.com.au) or [www.ausmeat.com.au](http://www.ausmeat.com.au)



### Providers of:

Organic Certification (DOA & NOP), BRC, ISO9001, SQF, Woolworths, Coles, GLOBALG.A.P., Freshcare,

Codex HACCP, McDonalds SQMS, Costco, Aldi, Spotless Catering and North American Audit services.



*Please consider the environment before printing this email.*

## Schurkamp, Lynnea - AMS

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**From:** OIA - Internacional <internacional@oia.com.ar>  
**Sent:** Tuesday, March 01, 2016 11:28 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget McElroy,

Thank you for your e-mail.

OIA do not certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards.

Sincerely,



Ing. Agr. Sofia Landa

[internacional@oia.com.ar](mailto:internacional@oia.com.ar) | [www.oia.com.ar](http://www.oia.com.ar)

Tel: (54 11) 4793-4340 / 4798-9084

Av. Santa Fe 830 | (B1641ABN) Acassuso | Bs. As. | Argentina

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## Schurkamp, Lynnea - AMS

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**From:** Kelly Abbott <kabbott@ics-intl.com>  
**Sent:** Wednesday, March 16, 2016 2:42 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** Dawn Krapp  
**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget:

My apologies for replying to you past the deadline.

We currently have one active certified organic hydroponic operation located in North Carolina. They have a tower and dutch bucket system. They are certified for pea shoots and micro greens.

Kelly Abbott  
Compliance Team Leader

International Certification Services, Inc.  
Kabbott@[ics-intl.com](mailto:kabbott@ics-intl.com)  
[www.ics-intl.com](http://www.ics-intl.com)

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## Schurkamp, Lynnea - AMS

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**From:** Ronald Larsen <rlarsen@utah.gov>  
**Sent:** Tuesday, March 01, 2016 11:06 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** hydroponic, aquaponic, aeroponic?

UDAF does NOT certify any of these types of operations currently. Thank you

--

Ron Larsen  
Organic, Seed, Nursery and Fertilizer  
Programs Manager  
[rlarsen@utah.gov](mailto:rlarsen@utah.gov)  
Office 801-538-7187  
Fax 801-538-7189

## Schurkamp, Lynnea - AMS

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**From:** Nicole Dehne <nicole@nofavt.org>  
**Sent:** Tuesday, March 22, 2016 4:54 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** hydroponic, aquaponic, and aeroponic

Hi Bridget,

Vermont Organic Farmers does not certify any of these types of operations.

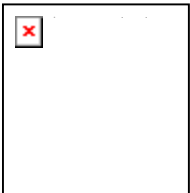
Best,

Nicole

--

Nicole Dehne  
Certification Administrator  
Vermont Organic Farmers LLC  
PO Box 697  
Richmond VT 05477  
802-434-3821

**Certified Organic, Locally Grown**





## Schurkamp, Lynnea - AMS

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**From:** Webster, Georgana <GWebster@mt.gov>  
**Sent:** Tuesday, March 01, 2016 10:18 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** hydroponic, aquaponics survey

*Bridget,*

*We do not currently certify any of these types of operations, but have at least one or two inquiries every year regarding the rule and starting them.*

*Georgana*

Georgana Webster  
Organic Program Manager  
Montana Department of Agriculture  
302 North Roberts  
Helena, Montana  
59601  
Office: 406-444-9421  
Fax: 406-444-9466  
Email: gwebster@mt.gov

## Schurkamp, Lynnea - AMS

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**From:** Baron , Anne - AMS <AnneP.Baron@ams.usda.gov> on behalf of AMS - AIAinbox <AIAinbox@ams.usda.gov>  
**Sent:** Tuesday, March 01, 2016 10:12 AM  
**To:** AMS - AIAinbox  
**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney

Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Philippe Descamps <pdescamps@eco-logica.com>  
**Sent:** Wednesday, March 16, 2016 8:44 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** Hydroponic organic certification by Eco-LOGICA (Costa Rica)

Dear Bridget,

Eco-LOGICA certifies two hydroponic operators with NOP regulations.  
The operators are Finca La Granja/Agroaromas and Finca el Naranjal/Agroaromas in Colombia (South America)  
The certified products are herbs (mostly basil) but also Rosemary and tarragon.

Best regards,

Philippe Descamps  
Director de acreditación y calidad  
Eco-LOGICA S.A.

Tel. 2297 6676  
Cel. (b) (6)

## Schurkamp, Lynnea - AMS

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**From:** Kyla Smith <kyla@paorganic.org>  
**Sent:** Tuesday, March 08, 2016 11:32 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** hydroponics

Bridget-

Please see our answers to the questions in blue below.

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? [Yes, hydroponic only.](#)

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? [5](#)

In what state or country (if international) are the certified operations located (list)? [Pennsylvania](#)

What crops do these certified operations produce (list)? [tobacco seedlings, sprouts, chard, collards, lettuce, kale, microgreens](#)

Let me know if you have further questions.

Thanks-  
Kyla

--

Kyla Smith  
Certification Director  
Pennsylvania Certified Organic  
106 School Street, Suite 201 Spring Mills, PA 16875  
Phone: 814-422-0251  
[www.paorganic.org](http://www.paorganic.org)

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## Schurkamp, Lynnea - AMS

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**From:** reuven flamer <nfccertification@gmail.com>  
**Sent:** Wednesday, March 16, 2016 11:25 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** Hydroponics

NFC has no such systems certified with us at this time

--  
Reuven Flamer  
Natural Food Certifiers  
1618 Union Street  
Brooklyn, NY 11213  
914-319-9040 Fax **1 (914) 455-0238**  
[NFCcertification.com](http://NFCcertification.com)  
Organic, Kosher, GMO GUARD, Gluten Safe, Vegan, and Natural Food Certification

## Schurkamp, Lynnea - AMS

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**From:** NOP ICEA <nop@icea.info>  
**Sent:** Friday, March 18, 2016 4:00 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** I: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Mrs. Bridget,

ICEA has not any company certified for hydroponic, aquaponic and aeroponic system.

Best regards,  
Cristina Baia  
Export Office ICEA  
[nop@icea.info](mailto:nop@icea.info)  
[www.icea.info](http://www.icea.info)

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**Da:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **Per conto di** AMS - AIAinbox  
**Inviato:** mercoledì 16 marzo 2016 20:30  
**A:** AMS - AIAinbox <AIAinbox@ams.usda.gov>  
**Oggetto:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

\*\*\*Original Message\*\*\*

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

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- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

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**From:** Meriem Aroussi <meriem.aroussi@mayacert.com>  
**Sent:** Wednesday, March 02, 2016 1:46 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** 'Juan Antonio Mendoza'  
**Subject:** Mayacert - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget,

Mayacert doesn't certify any hydroponic, aeroponic or aquaponic operations to the USDA organic standards.

Don't hesitate to contact me if you need any further information.

Regards,



*Meriem Aroussi*  
*Quality Manager*

---

### **MAYACERT S.A.**

18 Calle 7-25 zona 11 Col. Mariscal, Guatemala.

PBX: (+502)2463-3333 FAX: (+502)2463-3333 Ext: 107

Cel: (b) (6) Skype: (b) (6)

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## Schurkamp, Lynnea - AMS

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**From:** Deanna Baldwin -MDA- <deanna.baldwin@maryland.gov>  
**Sent:** Wednesday, March 16, 2016 8:20 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** MDA response

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **NO, MDA does not certify any of these types of operations**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

--

Deanna Baldwin  
Program Manager, Food Quality Assurance  
Maryland Department of Agriculture  
50 Harry S. Truman Parkway  
Annapolis, MD 21401  
410-841-5769

## Schurkamp, Lynnea - AMS

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**From:** Cindy Elder <CElder@ocia.org>  
**Sent:** Tuesday, March 01, 2016 11:18 AM  
**To:** McElroy, Bridget - AMS  
**Cc:** Cindy Elder  
**Subject:** OCIA Intl FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget,

OCIA International does not certify any hydroponic, aeroponic, or aquaponic operations.

Thank you,  
Cindy

### Cindy Elder

Director of Accreditation and Inspector Services/Board Liaison  
OCIA International, Inc.  
1340 N. Cotner Blvd  
Lincoln, NE 68505 USA  
Phone: (402) 477-2323 Ext. 327  
Fax: (402) 477-4325  
[www.ocia.org](http://www.ocia.org)

OCIA is committed to providing environmentally sound stewardship through research, education, professional development and organic certification for organic farmers and processors.

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**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox

**Sent:** Tuesday, March 01, 2016 9:12 AM

**To:** AMS - AIAinbox

**Cc:** admin@abeeorganic.com; sarah@abeeorganic.com; ro@abeeorganic.com; info@ascorganic.com; Kat@ascorganic.com; mfigueiras@argencert.com.ar; americert@gmail.com; americert@gmail.com; organic@ausmeat.com.au; info@argencert.com.ar; lmontenegro@argencert.com.ar; jorge.larranaga@aco.net.au; organic@ausqual.com.au; elise@ausqual.com.au; dcox@baystateorganic.org; michael.baker@aco.net.au; michael.baker@aco.net.au; roxana.priego@biolatina.com.pe; baystateorganic@earthlink.net; Koble, Clinton - FSA, Reno, NV; emel.erkon@bio-inspecta.com; central@biolatina.com; baystateorganic@earthlink.net; amalia.rueda@bioagricert.org; admin@bio-inspecta.ch; central@biolatina.com; Pat.Kennelly@cdph.ca.gov; info@bioagricert.org; julia.winter@bio-inspecta.ch; accreditation@ccof.org; Bolicert@megalink.com; riccardo.cozzo@bioagricert.org; calidad@certimexsc.com; rporto@caae.es; Bolicert@bolicert.org; tom.nizet@certisys.eu; ccof@ccof.org; rporto@caae.es; saltmn@clemson.edu; ccpb@ccpb.it; Danny.Lee@cdfa.ca.gov; mitchell.yergert@state.co.us; certimex@certimexsc.com; Lewin Jake-FASConatct; jvdschootbrugge@controlunion.com; ceres@ceres-cert.com; rsetti@ccpb.it; vincent.morel@ecocert.com; info@certisys.eu; direccionejecutiva@certimexsc.com; agroecologiauna@gmail.com; organic@clemson.edu; benzing@ceres-cert.com; mefraga@foodsafety.com.ar; amy.stafford@state.co.us; Nathalie.Boes@certisys.eu; joy.mccracken@georgiacrop.com; organic@controlunion.com; organic@clemson.edu; cvanhook77@earthlink.net; info.ecocertico@ecocert.com; amy.stafford@state.co.us; goabecky@centurylink.net; aude.bonnet@ecocert.com;

dszalai@controlunion.com; camila@ibd.com.br; ep@ecoglobe.am; Jeffry.EVARD@ecocert.com; Jason.Laney@agri.idaho.gov; pdescamps@eco-logica.com; aude.bonnet@ecocert.com; Beatrice.Breuer@imo.ch; info@etko.org; nd@ecoglobe.am; Mary.nieland@iowaagriculture.gov; foodsafety@foodsafety.com.ar; pdescamps@eco-logica.com; p.perrone@icea.info; terry.hollifield@georgiacrop.com; ma@etko.org; Kristen.Branscum@ky.gov; info@globalculture.us; calidad@foodsafety.com.ar; herr@bcs-oeko.de; goaorg@centurylink.net; terry.hollifield@georgiacrop.com; a.moutapam@lacon-institut.org; lbd@lbd.com.br; globalculture@earthlink.net; monica@letis.org; Johanna.Phillips@agri.idaho.gov; goaorg@centurylink.net; scarlsen@co.marin.ca.us; imo@imo.ch; gwendal@ibd.com.br; juanantonio.mendoza@mayacert.com; info@ics-intl.com; Johanna.Phillips@agri.idaho.gov; spwalker@mosaorganic.org; maury.wills@iowaagriculture.gov; soh@imo.ch; wippl001@umn.edu; nop@icea.info; dawn@ics-intl.com; knewkirk@mofga.org; adam.watson@ky.gov; maury.wills@iowaagriculture.gov; etyanich@mt.gov; info@bcs-oeko.de; nop@icea.info; CarltonN@co.monterey.ca.us; lacon@lacon-institut.org; adam.watson@ky.gov; kirriley.becker@nasaa.com.au; letis@letis.org; fischer@bcs-oeko.de; cfanta@naturesinternational.com; jstiles@marincounty.org; j.kopp@lacon-institut.org; jabbott@agri.nv.gov; FGIS OA, Maryland; internacional@letis.org; Victoria.Smith@agr.nh.gov; info@mayacert.com; jstiles@marincounty.org; Daniel.wunderlich@ag.state.nj.us; mosa@mosaorganic.org; FGIS OA, Maryland; SGerk@nmda.nmsu.edu; mncia@mncia.org; noe.rivera@mayacert.com; lisaengelbert@nofany.org; certification@mofga.org; cskolaski@mosaorganic.org; Bryan.Buchwald@ag.ok.gov; agrorganic@mt.gov; michelle.menken@mncia.org; leng@oda.state.or.us; agcomm@co.monterey.ca.us; yurlina@mofga.org; Amanda Brewster; sachin.ayachit@nasaa.com.au; gwebster@mt.gov; gestiondecalidad@oia.com.ar; nfc certification@gmail.com; Huntinggb@co.monterey.ca.us; hi.yoshida@omicnet.com; nics@naturesinternational.com; sachin.ayachit@nasaa.com.au; kyla@paorganic.org; Jennifer.Gornnert@agr.nh.gov; nfc certification@gmail.com; brian.mansfield@primuslabs.com; erich.bremer@ag.state.nj.us; dave@naturesinternational.com; byron.hamm@pro-cert.org; organic@nmda.nmsu.edu; ajepson@agri.nv.gov; thughes@nsf.org; certifiedorganic@nofany.org; Jennifer.Gornnert@agr.nh.gov; ram@qcsinfo.org; organic@oeffa.org; erich.bremer@ag.state.nj.us; dkirsanovaphillips@scscertified.com; jeff.stearns@ag.ok.gov; bbakker@nmda.nmsu.edu; rhougaard@utah.gov; info@onecert.com; lori@nofany.org; Laura@nofavt.org; cid-organic@oda.state.or.us; andy@oeffa.org; srice@agr.wa.gov; organic@tilth.org; jeff.stearns@ag.ok.gov; john.young@yolocounty.org; info@occert.com; sam@onecert.com; xiao@ofdc.org.cn; kallen@oda.state.or.us; oia@oia.com.ar; connie@tilth.org; ocd@omicnet.com; susan@occert.com; pco@paorganic.org; Cindy Elder; PrimusOrganic@primuslabs.com; xiao@ofdc.org.cn; info@pro-cert.org; pedroalanda@oia.com.ar; qai@qai-inc.com; ocd@omicnet.com; qcs@qcsinfo.org; leslie@paorganic.org; matt.green@dem.ri.gov; deborah.mansfield@primuslabs.com; organic@scsglobalservice.com; Dave.Lockman@pro-cert.org; Sally@Demeter-USA.org; irendon@nsf.org; Organic@TexasAgriculture.gov; robin@qcsinfo.org; (b) (6) @gmail.com; matt.green@dem.ri.gov; rlarsen@utah.gov; bnauman@scsglobalservices.com; Info@nofavt.org; Sally@Demeter-USA.org; organic@agr.wa.gov; Mary.Holliman@texasagriculture.gov; dennis.chambers@yolocounty.org; (b) (6) @gmail.com; rlarsen@utah.gov; Nicole@nofavt.org; bbook@agr.wa.gov; dennis.chambers@yolocounty.org

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

#### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets

- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Sarah Costin <sarah.abeeorganic@gmail.com>  
**Sent:** Tuesday, March 01, 2016 2:37 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** Ro Leigh Elgas  
**Subject:** Questions regarding hydroponic certification

Good afternoon Bridget,

I'm answering your "Questions for Certifying Agents":

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

Yes

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

10 currently certified, 1 in process (7 hydroponic, 4 aquaponic, no aeroponic)

In what state or country (if international) are the certified operations located (list)?

Alaska: 1; California: 7; Colorado: 2; Virginia 1

What crops do these certified operations produce (list)?

Arugula, Baby lettuce, Basil, Bell peppers, Brassicas, Chard, Cucumbers, Greens, Green beans, Herbs, Kale, Lettuce-Head, Lettuce- Leaf, Mints, Mizuna, Onions, Snap peas, Sorrel, Spinach, Sprouts, Summer Squash, Tat soi, Tomatoes, Upland cress, Watercress, Wheatgrass

We look forward to hearing more on hydroponic/aquaponic/aeroponic systems as they fit into the USDA NOP.

Sarah  
Sarah Costin  
Co-Creator/Owner

A Bee Organic  
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760-731-0155 Ext. 103

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Friday, April 01, 2016 10:51 AM  
**To:** michelle.menken@mncia.org  
**Subject:** RE: aquaponic/hydroponic

Thank you Michelle!

---

**From:** Michelle Menken [mailto:michelle.menken@mncia.org]  
**Sent:** Wednesday, March 23, 2016 4:19 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** aquaponic/hydroponic

Hello Bridget,

### **Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **Yes**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **We have two certified operations- one aquaponics and one hydroponic.**

In what state or country (if international) are the certified operations located (list)? **Both are in Minnesota.**

What crops do these certified operations produce (list)? **Here are the crop lists off the two certificates:**

#### **100% Organic Production**

Products: Aquaponic production of Arugula; Basil; Chard; Cilantro; Kale; Lettuce; Mint;  
Pak choi; Parsley; Rosemary; Spinach; Taisoi; Thyme; and Watercress

#### **100% Organic Production**

Processes: Growing in hydroponic system and packaging  
Products: Arugula; Basil; Bay leaves; Chervil; Chives; Cilantro; Dill; Lavender; Lemongrass;  
Marjoram; Mint; Oregano; Parsley; Sage; Savory; Sorrel; Tarragon; Thyme;  
Thyme (lemon); and Watercress

Yours truly,

Michelle Menken  
Organic Program  
Minnesota Crop Improvement Association/MCIA  
1-855-213-4461  
612-625-3123 (direct)





## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Friday, April 01, 2016 10:46 AM  
**To:** Global Culture - Linda Van Hook  
**Subject:** RE: Global Culture responses to Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you Linda!

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**From:** Global Culture - Linda Van Hook [mailto:Linda@globalculture.us]  
**Sent:** Tuesday, March 22, 2016 4:07 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** Global Culture responses to Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget,

Please find Global Culture's answers to your questions, below, marked in Blue.

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **No, Global Culture does not.**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **Not Applicable**

In what state or country (if international) are the certified operations located (list)? **Not Applicable**

What crops do these certified operations produce (list)? **Not Applicable**

**Please let us know if you have any further questions.**

**Kind Regards,**

**Linda Van Hook**  
**Global Culture**  
**315 Meigs Road, Ste. A-404**  
**Santa Barbara, CA 93109**  
**Tel (707) 464-6913, Fax (888) 493-7818**  
**[Linda@globalculture.us](mailto:Linda@globalculture.us)**

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 03, 2016 4:29 PM  
**To:** Winter Julia  
**Subject:** RE: Hydroponic, Aeroponic...

Thank you, Julia.

### Bridget McElroy

Policy Analyst  
USDA National Organic Program  
1400 Independence Ave. SW  
Room 2646-S. (Stop 0268)  
Washington, D.C. 20205

(202) 260-9288

---

**From:** Winter Julia [mailto:julia.winter@bio-inspecta.ch]  
**Sent:** Thursday, March 03, 2016 2:29 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** Hydroponic, Aeroponic...

Dear Mrs Mc Elroy,

bio.inspecta AG, Switzerland doesn't certify hydroponic, aeroponic or aquaponic operations.

Kind regards,

Julia Winter  
**bio.inspecta AG**  
Department Processing and Trade  
Tel +41 62 865 63 24  
Fax +41 62 865 63 01  
[julia.winter@bio-inspecta.ch](mailto:julia.winter@bio-inspecta.ch)  
[www.bio-inspecta.ch](http://www.bio-inspecta.ch)



**Fokus: Täuschung**

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[lebensmitteltag.ch](http://lebensmitteltag.ch)



## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 03, 2016 4:22 PM  
**To:** Ronald Larsen  
**Subject:** RE: hydroponic, aquaponic, aeroponic?

Thank you, Ron.

**From:** Ronald Larsen [mailto:rlarsen@utah.gov]  
**Sent:** Tuesday, March 01, 2016 11:06 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** hydroponic, aquaponic, aeroponic?

UDAF does NOT certify any of these types of operations currently. Thank you

--

Ron Larsen  
Organic, Seed, Nursery and Fertilizer  
Programs Manager  
[rlarsen@utah.gov](mailto:rlarsen@utah.gov)  
Office 801-538-7187  
Fax 801-538-7189

## Schurkamp, Lynnea - AMS

---

**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 03, 2016 4:24 PM  
**To:** Gwendal Bellocq - IBD Certificações  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production System\_01032016

Thank you, Gwendal.

### Bridget McElroy

Policy Analyst  
USDA National Organic Program  
1400 Independence Ave. SW  
Room 2646-S. (Stop 0268)  
Washington, D.C. 20205

(202) 260-9288

---

**From:** Gwendal Bellocq - IBD Certificações [mailto:gwendal@ibd.com.br]  
**Sent:** Tuesday, March 01, 2016 11:59 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production System\_01032016

Dear Bridget McElroy,

As requested please see IBD's answer below:

- Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **NO.**
- If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **NONE**
- In what state or country (if international) are the certified operations located (list)? **NO ONE**
- What crops do these certified operations produce (list)? **NONE**

I remain at your service for any further question you may have.

Best regards.

Gwendal Bellocq  
Gerente Geral de Certificação / General Manager



FONE: +55(14)38119800 / FAX: +55(14)38119801

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**De:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **Em nome de** AMS - AIAinbox

**Enviada em:** terça-feira, 1 de março de 2016 12:12

**Para:** AMS - AIAinbox

**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); Koble, Clinton - FSA, Reno, NV; [emel.erkon@bio-inspecta.com](mailto:emel.erkon@bio-inspecta.com); [central@biolatina.com](mailto:central@biolatina.com); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); [amalia.rueda@bioagricert.org](mailto:amalia.rueda@bioagricert.org); [admin@bio-inspecta.ch](mailto:admin@bio-inspecta.ch); [central@biolatina.com](mailto:central@biolatina.com); [Pat.Kennelly@cdph.ca.gov](mailto:Pat.Kennelly@cdph.ca.gov); [info@bioagricert.org](mailto:info@bioagricert.org); [julia.winter@bio-inspecta.ch](mailto:julia.winter@bio-inspecta.ch); [accreditation@ccof.org](mailto:accreditation@ccof.org); [Bolicert@megalink.com](mailto:Bolicert@megalink.com); [riccardo.cozzo@bioagricert.org](mailto:riccardo.cozzo@bioagricert.org); [calidad@certimexsc.com](mailto:calidad@certimexsc.com); [rporto@caae.es](mailto:rporto@caae.es); [Bolicert@bolicert.org](mailto:Bolicert@bolicert.org); [tom.nizet@certisys.eu](mailto:tom.nizet@certisys.eu); [ccof@ccof.org](mailto:ccof@ccof.org); [rporto@caae.es](mailto:rporto@caae.es); [saltmn@clemson.edu](mailto:saltmn@clemson.edu); [ccpb@ccpb.it](mailto:ccpb@ccpb.it); [Danny.Lee@cdfa.ca.gov](mailto:Danny.Lee@cdfa.ca.gov); [mitchell.yergert@state.co.us](mailto:mitchell.yergert@state.co.us); [certimex@certimexsc.com](mailto:certimex@certimexsc.com); Lewin Jake-FASConatct; [jvdschootbrugge@controlunion.com](mailto:jvdschootbrugge@controlunion.com); [ceres@ceres-cert.com](mailto:ceres@ceres-cert.com); [rsetti@ccpb.it](mailto:rsetti@ccpb.it); [vincent.morel@ecocert.com](mailto:vincent.morel@ecocert.com); [info@certisys.eu](mailto:info@certisys.eu); [direccionejecutiva@certimexsc.com](mailto:direccionejecutiva@certimexsc.com); [agroecologiauna@gmail.com](mailto:agroecologiauna@gmail.com); [organic@clemson.edu](mailto:organic@clemson.edu); [benzing@ceres-cert.com](mailto:benzing@ceres-cert.com); [mefraga@foodsafety.com.ar](mailto:mefraga@foodsafety.com.ar); [amy.stafford@state.co.us](mailto:amy.stafford@state.co.us); [Nathalie.Boes@certisys.eu](mailto:Nathalie.Boes@certisys.eu); [joy.mccracken@georgiacrop.com](mailto:joy.mccracken@georgiacrop.com); [organic@controlunion.com](mailto:organic@controlunion.com); [organic@clemson.edu](mailto:organic@clemson.edu); [cvanhook77@earthlink.net](mailto:cvanhook77@earthlink.net); [info.ecocertico@ecocert.com](mailto:info.ecocertico@ecocert.com); [amy.stafford@state.co.us](mailto:amy.stafford@state.co.us); [goabecky@centurylink.net](mailto:goabecky@centurylink.net); [aude.bonnet@ecocert.com](mailto:aude.bonnet@ecocert.com); [dszalai@controlunion.com](mailto:dszalai@controlunion.com); [camila@ibd.com.br](mailto:camila@ibd.com.br); [ep@ecoglobe.am](mailto:ep@ecoglobe.am); [Jeffry.EVARD@ecocert.com](mailto:Jeffry.EVARD@ecocert.com);

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[a.moutapam@lacon-institut.org](mailto:a.moutapam@lacon-institut.org); [lbd@lbd.com.br](mailto:lbd@lbd.com.br); [globalculture@earthlink.net](mailto:globalculture@earthlink.net); [monica@letis.org](mailto:monica@letis.org); [Johanna.Phillips@agri.idaho.gov](mailto:Johanna.Phillips@agri.idaho.gov); [goaorg@centurylink.net](mailto:goaorg@centurylink.net); [scarlsen@co.marin.ca.us](mailto:scarlsen@co.marin.ca.us); [imo@imo.ch](mailto:imo@imo.ch); [gwendal@ibd.com.br](mailto:gwendal@ibd.com.br); [juanantonio.mendoza@mayacert.com](mailto:juanantonio.mendoza@mayacert.com); [info@ics-intl.com](mailto:info@ics-intl.com); [Johanna.Phillips@agri.idaho.gov](mailto:Johanna.Phillips@agri.idaho.gov); [spwalker@mosaorganic.org](mailto:spwalker@mosaorganic.org); [maury.wills@iowaagriculture.gov](mailto:maury.wills@iowaagriculture.gov); [soh@imo.ch](mailto:soh@imo.ch); [wippl001@umn.edu](mailto:wippl001@umn.edu); [nop@icea.info](mailto:nop@icea.info); [dawn@ics-intl.com](mailto:dawn@ics-intl.com); [knewkirk@mofga.org](mailto:knewkirk@mofga.org); 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[bbook@agr.wa.gov](mailto:bbook@agr.wa.gov); [dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)

**Assunto:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets



- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 17, 2016 4:53 PM  
**To:** Stiles, Jeffrey  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems - MOCA

Thank you, Jeffrey!

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**From:** Stiles, Jeffrey [mailto:JStiles@marincounty.org]  
**Sent:** Thursday, March 17, 2016 10:53 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems - MOCA

Good Day Bridget,

**Questions for Certifying Agents:**

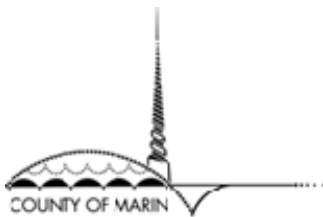
Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **No.**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **N/A.**

In what state or country (if international) are the certified operations located (list)? **N/A.**

What crops do these certified operations produce (list)? **N/A.**

Best Regards,



.....  
**Jeffrey Stiles**  
INSPECTOR

County of Marin  
Department of Agriculture, Weights and Measures  
1682 Novato Boulevard, Suite 150-A  
Novato, CA 94947  
415 473 6700 T  
415 473 7543 F  
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[JStiles@marincounty.org](mailto:JStiles@marincounty.org)

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## Schurkamp, Lynnea - AMS

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**From:** Rendon, Iris <irendon@gftc.ca>  
**Sent:** Monday, March 21, 2016 9:49 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you for confirming receipt.  
Best regards,

### Iris Rendon

Quality Specialist  
NSF International - Canada  
☎ (+1) 519-821-1246 ext. 5059  
✉ [irendon@nsf.org](mailto:irendon@nsf.org)  
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**From:** McElroy, Bridget - AMS [mailto:[Bridget.McElroy@ams.usda.gov](mailto:Bridget.McElroy@ams.usda.gov)]  
**Sent:** March-17-16 4:20 PM  
**To:** Rendon, Iris  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hi Iris,

I am going through a whole lot of emails in the order that they came in, so I didn't see your second one until now. I will use this updated information.

Thank you again for your help.

Bridget

---

**From:** Rendon, Iris [mailto:[irendon@gftc.ca](mailto:irendon@gftc.ca)]  
**Sent:** Thursday, March 10, 2016 4:12 PM  
**To:** McElroy, Bridget - AMS <[Bridget.McElroy@ams.usda.gov](mailto:Bridget.McElroy@ams.usda.gov)>  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello,  
I had submitted a response to this inquiry earlier, however, some corrections have been made by the technical team. Please accept this response and disregard the previous email on this subject.  
Thank you and best regards.

## Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **Yes**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **Eight, however, please see attachment with comments. You may arrive at a different conclusion.**

In what state or country (if international) are the certified operations located (list)? **See attached.**

What crops do these certified operations produce (list)? **See attached.**

## **Iris Rendon**

Quality Specialist

NSF International - Canada

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**From:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **On Behalf Of** AMS - AIAinbox

**Sent:** March-01-16 10:12 AM

**To:** AMS - AIAinbox

**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); 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**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

---

**From:** Mann, Renee - AMS  
**Sent:** Monday, March 14, 2016 9:16 AM  
**To:** McElroy, Bridget - AMS  
**Cc:** Courtney, Cheri - AMS  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hi Bridget:

I'd say (b) (5)

We can send an update out today –

I'm sure a reminder won't hurt.

-Renee

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

---

**From:** McElroy, Bridget - AMS  
**Sent:** Monday, March 14, 2016 9:09 AM  
**To:** Mann, Renee - AMS <Renee.Mann@ams.usda.gov>  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Good morning Renee,

So, I (b) (5)

Let me know what you think is the best thing to do. Thanks again to AIA for the help on this!

Bridget

---

**From:** Mann, Renee - AMS  
**Sent:** Tuesday, March 01, 2016 11:00 AM  
**To:** McElroy, Bridget - AMS <[Bridget.McElroy@ams.usda.gov](mailto:Bridget.McElroy@ams.usda.gov)>  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

It went to the 80 accredited certifiers, and the California State Organic Program (so they know what we're asking of the certifiers).

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635



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**From:** McElroy, Bridget - AMS  
**Sent:** Tuesday, March 01, 2016 10:55 AM  
**To:** Mann, Renee - AMS <[Renee.Mann@ams.usda.gov](mailto:Renee.Mann@ams.usda.gov)>  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Oh, how many ACAs total did it go to?

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**From:** Mann, Renee - AMS  
**Sent:** Tuesday, March 01, 2016 10:35 AM  
**To:** McElroy, Bridget - AMS <[Bridget.McElroy@ams.usda.gov](mailto:Bridget.McElroy@ams.usda.gov)>  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

FYI

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

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**From:** Baron , Anne - AMS  
**Sent:** Tuesday, March 01, 2016 10:29 AM  
**To:** Courtney, Cheri - AMS <[Cheri.Courtney@ams.usda.gov](mailto:Cheri.Courtney@ams.usda.gov)>; Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>; Gebault King, ReneeA - AMS <[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)>; Lopez, JasonJ - AMS <[JasonJ.Lopez@ams.usda.gov](mailto:JasonJ.Lopez@ams.usda.gov)>; Lusby, MaryLou - AMS <[MaryLou.Lusby@ams.usda.gov](mailto:MaryLou.Lusby@ams.usda.gov)>; Mann, Renee - AMS <[Renee.Mann@ams.usda.gov](mailto:Renee.Mann@ams.usda.gov)>; Yang, RobertH - AMS <[RobertH.Yang@ams.usda.gov](mailto:RobertH.Yang@ams.usda.gov)>; Zuck, Penelope - AMS <[Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)>; Adams, Edith - AMS <[Edith.Adams@ams.usda.gov](mailto:Edith.Adams@ams.usda.gov)>; Caceres, Miguel - AMS <[Miguel.Caceres@ams.usda.gov](mailto:Miguel.Caceres@ams.usda.gov)>; Friesenhahn, Martin - AMS <[Martin.Friesenhahn@ams.usda.gov](mailto:Martin.Friesenhahn@ams.usda.gov)>; Gilbert, Corey - AMS <[Corey.Gilbert@ams.usda.gov](mailto:Corey.Gilbert@ams.usda.gov)>; Heckart, Patricia - AMS <[Patricia.Heckart@ams.usda.gov](mailto:Patricia.Heckart@ams.usda.gov)>; Hildreth, David - AMS <[David.Hildreth@ams.usda.gov](mailto:David.Hildreth@ams.usda.gov)>; Horne, Willy - AMS <[Willy.Horne@ams.usda.gov](mailto:Willy.Horne@ams.usda.gov)>; Kohles, Alan - AMS <[Alan.Kohles@ams.usda.gov](mailto:Alan.Kohles@ams.usda.gov)>; Lopez, Mike - AMS <[Mike.Lopez@ams.usda.gov](mailto:Mike.Lopez@ams.usda.gov)>; Matejovsky, Kathryn - AMS <[Kathryn.Matejovsky@ams.usda.gov](mailto:Kathryn.Matejovsky@ams.usda.gov)>; Ross, Steve - AMS <[Steve.Ross@ams.usda.gov](mailto:Steve.Ross@ams.usda.gov)>; Schoop, Jamie - AMS <[Jamie.Schoop@ams.usda.gov](mailto:Jamie.Schoop@ams.usda.gov)>; Skinner, Rick - AMS <[Rick.Skinner@ams.usda.gov](mailto:Rick.Skinner@ams.usda.gov)>; Wilson, Darrell - AMS <[Darrell.Wilson@ams.usda.gov](mailto:Darrell.Wilson@ams.usda.gov)>; Gebel, Kelley - AMS <[Kelley.Gebel@ams.usda.gov](mailto:Kelley.Gebel@ams.usda.gov)>; McEvoy, Miles - AMS <[Miles.McEvoy@ams.usda.gov](mailto:Miles.McEvoy@ams.usda.gov)>; Tucker, Jennifer - AMS <[Jennifer.Tucker@ams.usda.gov](mailto:Jennifer.Tucker@ams.usda.gov)>; Nelson, Kristen - AMS <[Kristen.Nelson@ams.usda.gov](mailto:Kristen.Nelson@ams.usda.gov)>; Lewis, Paul I - AMS <[Paull.Lewis@ams.usda.gov](mailto:Paull.Lewis@ams.usda.gov)>; Holmes, Vella - AMS <[Vella.Holmes@ams.usda.gov](mailto:Vella.Holmes@ams.usda.gov)>; Michael, Matthew - AMS <[Matthew.Michael@ams.usda.gov](mailto:Matthew.Michael@ams.usda.gov)>; [andy@oeffa.org](mailto:andy@oeffa.org)  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear AIA staff, NOP Management Team and QAD auditors,

Please find below the message sent to the certifiers.  
Let us know if you have any questions.

Regards,  
Alvik Joseph

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**From:** Baron , Anne - AMS **On Behalf Of** AMS - AIAinbox  
**Sent:** Tuesday, March 01, 2016 10:12 AM

To: AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>

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USA.org' <[Sally@Demeter-USA.org](mailto:Sally@Demeter-USA.org)>; 'irendon@nsf.org' <[irendon@nsf.org](mailto:irendon@nsf.org)>; 'Organic@TexasAgriculture.gov'  
<[Organic@TexasAgriculture.gov](mailto:Organic@TexasAgriculture.gov)>; 'robin@qcsinfo.org' <[robin@qcsinfo.org](mailto:robin@qcsinfo.org)>; 'Toaf007@gmail.com'  
<[Toaf007@gmail.com](mailto:Toaf007@gmail.com)>; 'matt.green@dem.ri.gov' <[matt.green@dem.ri.gov](mailto:matt.green@dem.ri.gov)>; 'rlarsen@utah.gov' <[rlarsen@utah.gov](mailto:rlarsen@utah.gov)>;  
'bnauman@scsglobalservices.com' <[bnauman@scsglobalservices.com](mailto:bnauman@scsglobalservices.com)>; 'Info@nofavt.org' <[Info@nofavt.org](mailto:Info@nofavt.org)>;

'Sally@Demeter-USA.org' <[Sally@Demeter-USA.org](mailto:Sally@Demeter-USA.org)>; 'organic@agr.wa.gov' <[organic@agr.wa.gov](mailto:organic@agr.wa.gov)>;  
'Mary.Holliman@texasagriculture.gov' <[Mary.Holliman@texasagriculture.gov](mailto:Mary.Holliman@texasagriculture.gov)>; 'dennis.chambers@yolocounty.org'  
<[dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)>; (b) (6) @gmail.com (b) (6) @gmail.com>; 'rlarsen@utah.gov'  
<[rlarsen@utah.gov](mailto:rlarsen@utah.gov)>; 'Nicole@nofavt.org' <[Nicole@nofavt.org](mailto:Nicole@nofavt.org)>; 'bbook@agr.wa.gov' <[bbook@agr.wa.gov](mailto:bbook@agr.wa.gov)>;  
'dennis.chambers@yolocounty.org' <[dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)>

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

#### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

#### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division



## Schurkamp, Lynnea - AMS

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**From:** Katherine Borchard <kat@ascorganic.com>  
**Sent:** Saturday, March 12, 2016 5:10 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **Hydroponic**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **One**

In what state or country (if international) are the certified operations located (list)? **CA**

What crops do these certified operations produce (list)? **Micro leafy greens**

### **Confidentiality Notice:**

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Katherine Borchard, ASCO Program Director

Agricultural Services Certified Organic  
PO Box 4871, Salinas, CA. 93912  
P: 831.449.6365 F: 831.975.4414



---

**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox

**Sent:** Tuesday, March 01, 2016 7:12 AM

**To:** AMS - AIAinbox

**Cc:** admin@abeeorganic.com; sarah@abeeorganic.com; ro@abeeorganic.com; Cathee Escobar; Katherine Borchard; mfigueiras@argencert.com.ar; americert@gmail.com; americert@gmail.com; organic@ausmeat.com.au; info@argencert.com.ar; lmontenegro@argencert.com.ar; jorge.larranaga@aco.net.au; organic@ausqual.com.au; elise@ausqual.com.au; dcox@baystateorganic.org; michael.baker@aco.net.au; michael.baker@aco.net.au; roxana.priego@biolatina.com.pe; baystateorganic@earthlink.net; Koble, Clinton - FSA, Reno, NV; emel.erkan@bio-inspecta.com; central@biolatina.com; baystateorganic@earthlink.net; amalia.rueda@bioagricert.org; admin@bio-inspecta.ch; central@biolatina.com; Pat.Kennelly@cdph.ca.gov; info@bioagricert.org; julia.winter@bio-inspecta.ch; accreditation@ccof.org; Bolicert@megalink.com; riccardo.cozzo@bioagricert.org; calidad@certimexsc.com; rporto@caae.es; Bolicert@bolicert.org; tom.nizet@certisys.eu; ccof@ccof.org; rporto@caae.es; saltmn@clemson.edu; ccpb@ccpb.it; Danny.Lee@cdfa.ca.gov; mitchell.yergert@state.co.us; certimex@certimexsc.com; Lewin Jake-FASConatct;

jvdschootbrugge@controlunion.com; ceres@ceres-cert.com; rsetti@ccpb.it; vincent.morel@ecocert.com; info@certisys.eu; direccionejecutiva@certimexsc.com; agroecologiauna@gmail.com; organic@clemson.edu; benzing@ceres-cert.com; mefraga@foodsafety.com.ar; amy.stafford@state.co.us; Nathalie.Boes@certisys.eu; joy.mccracken@georgiacrop.com; organic@controlunion.com; organic@clemson.edu; cvanhook77@earthlink.net; info.ecocertico@ecocert.com; amy.stafford@state.co.us; goabecky@centurylink.net; aude.bonnet@ecocert.com; dszalai@controlunion.com; camila@ibd.com.br; ep@ecoglobe.am; Jeffry.EVARD@ecocert.com; Jason.Laney@agri.idaho.gov; pdescamps@eco-logica.com; aude.bonnet@ecocert.com; Beatrice.Breuer@imo.ch; info@etko.org; nd@ecoglobe.am; Mary.nieland@iowaagriculture.gov; foodsafety@foodsafety.com.ar; pdescamps@eco-logica.com; p.perrone@icea.info; terry.hollifield@georgiacrop.com; ma@etko.org; Kristen.Branscum@ky.gov; info@globalculture.us; calidad@foodsafety.com.ar; herr@bcs-oeko.de; goaorg@centurylink.net; terry.hollifield@georgiacrop.com; a.moutapam@lacon-institut.org; lbd@lbd.com.br; globalculture@earthlink.net; monica@letis.org; Johanna.Phillips@agri.idaho.gov; goaorg@centurylink.net; scarlsen@co.marin.ca.us; imo@imo.ch; gwendal@ibd.com.br; juanantonio.mendoza@mayacert.com; info@ics-intl.com; Johanna.Phillips@agri.idaho.gov; spwalker@mosaorganic.org; maury.wills@iowaagriculture.gov; soh@imo.ch; wippl001@umn.edu; nop@icea.info; dawn@ics-intl.com; knewkirk@mofga.org; adam.watson@ky.gov; maury.wills@iowaagriculture.gov; etyanich@mt.gov; info@bcs-oeko.de; nop@icea.info; CarltonN@co.monterey.ca.us; lacon@lacon-institut.org; adam.watson@ky.gov; kirriley.becker@nasaa.com.au; letis@letis.org; fischer@bcs-oeko.de; cfanta@naturesinternational.com; jstiles@marincounty.org; j.kopp@lacon-institut.org; jabbott@agri.nv.gov; FGIS OA, Maryland; internacional@letis.org; Victoria.Smith@agr.nh.gov; info@mayacert.com; jstiles@marincounty.org; Daniel.wunderlich@ag.state.nj.us; mosa@mosaorganic.org; FGIS OA, Maryland; SGERk@nmda.nmsu.edu; mncia@mncia.org; noe.rivera@mayacert.com; lisaengelbert@nofany.org; certification@mofga.org; cskolaski@mosaorganic.org; Bryan.Buchwald@ag.ok.gov; agrorganic@mt.gov; michelle.menken@mncia.org; leng@oda.state.or.us; agcomm@co.monterey.ca.us; yurlina@mofga.org; abrewster@ocia.org; sachin.ayachit@nasaa.com.au; gwebster@mt.gov; gestiondecalidad@oia.com.ar; nfccertification@gmail.com; Huntinggb@co.monterey.ca.us; hi.yoshida@omicnet.com; nics@naturesinternational.com; sachin.ayachit@nasaa.com.au; kyla@paorganic.org; Jennifer.Gornert@agr.nh.gov; nfccertification@gmail.com; brian.mansfield@primuslabs.com; erich.bremer@ag.state.nj.us; dave@naturesinternational.com; byron.hamm@pro-cert.org; organic@nmda.nmsu.edu; ajepson@agri.nv.gov; thughes@nsf.org; certifiedorganic@nofany.org; Jennifer.Gornert@agr.nh.gov; ram@qcsinfo.org; organic@oeffa.org; erich.bremer@ag.state.nj.us; dkirsanovaphillips@scscertified.com; jeff.stearns@ag.ok.gov; bbakker@nmda.nmsu.edu; rhougaard@utah.gov; info@onecert.com; lori@nofany.org; Laura@nofavt.org; cid-organic@oda.state.or.us; andy@oeffa.org; srice@agr.wa.gov; organic@tilth.org; jeff.stearns@ag.ok.gov; john.young@yolocounty.org; info@occert.com; sam@onecert.com; xiao@ofdc.org.cn; kallen@oda.state.or.us; oia@oia.com.ar; connie@tilth.org; ocd@omicnet.com; susan@occert.com; pco@paorganic.org; celder@ocia.org; PrimusOrganic@primuslabs.com; xiao@ofdc.org.cn; info@pro-cert.org; pedroalanda@oia.com.ar; qai@qai-inc.com; ocd@omicnet.com; qcs@qcsinfo.org; leslie@paorganic.org; matt.green@dem.ri.gov; deborah.mansfield@primuslabs.com; organic@scsglobalservice.com; Dave.Lockman@pro-cert.org; Sally@Demeter-USA.org; irendon@nsf.org; Organic@TexasAgriculture.gov; robin@qcsinfo.org; (b) (6) @gmail.com; matt.green@dem.ri.gov; rlarsen@utah.gov; bnauman@scsglobalservices.com; Info@nofavt.org; Sally@Demeter-USA.org; organic@agr.wa.gov; Mary.Holliman@texasagriculture.gov; dennis.chambers@yolocounty.org; (b) (6) @gmail.com; rlarsen@utah.gov; Nicole@nofavt.org; bbook@agr.wa.gov; dennis.chambers@yolocounty.org

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media

for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Emily Garcia <Emily.Garcia@primusauditingops.com>  
**Sent:** Friday, March 11, 2016 1:48 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** PrimusOrganic; AuditQA  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems


Hello Bridget,

Please see Primus Labs responses in **Red**:

1. Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **Yes, we certify hydroponic operations**
2. If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **28**
3. In what state or country (if international) are the certified operations located (list)?  
**California**  
**Mexico**
4. What crops do these certified operations produce (list)?  
**Raspberries**  
**Blueberries**  
**Butter lettuce**

Let me know if you have any questions.

Best,

 **Primus AuditingOps**<sup>™</sup>  
Observe. Report.

**Emily Garcia**  
QA Specialist  
[Emily.Garcia@primusauditingops.com](mailto:Emily.Garcia@primusauditingops.com)  
Office 805.631.5248 | Direct Line 805.623.5542  
Fax 805.352.1364  
1259 Furukawa Way | Santa Maria | CA



---

**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox  
**Sent:** Tuesday, March 01, 2016 7:12 AM  
**To:** AMS - AIAinbox <AIAinbox@ams.usda.gov>  
**Cc:** admin@abeeorganic.com; sarah@abeeorganic.com; ro@abeeorganic.com; info@ascorganic.com;



Kat@ascorganic.com; mfigueiras@argencert.com.ar; americert@gmail.com; americert@gmail.com; organic@ausmeat.com.au; info@argencert.com.ar; lmontenegro@argencert.com.ar; jorge.larranaga@aco.net.au; organic@ausqual.com.au; elise@ausqual.com.au; dcox@baystateorganic.org; michael.baker@aco.net.au; michael.baker@aco.net.au; roxana.priego@biolatina.com.pe; baystateorganic@earthlink.net; Koble, Clinton - FSA, Reno, NV <clinton.koble@nv.usda.gov>; emel.erkar@bio-inspecta.com; central@biolatina.com; baystateorganic@earthlink.net; amalia.rueda@bioagricert.org; admin@bio-inspecta.ch; central@biolatina.com; Pat.Kennelly@cdph.ca.gov; info@bioagricert.org; julia.winter@bio-inspecta.ch; accreditation@ccof.org; Bolicert@megalink.com; riccardo.cozzo@bioagricert.org; calidad@certimexsc.com; rporto@caae.es; Bolicert@bolicert.org; tom.nizet@certisys.eu; ccof@ccof.org; rporto@caae.es; saltmn@clemson.edu; ccpb@ccpb.it; Danny.Lee@cdfa.ca.gov; mitchell.yergert@state.co.us; certimex@certimexsc.com; Lewin Jake-FASConatct <jake@ccof.org>; jvdschootbrugge@controlunion.com; ceres@ceres-cert.com; rsetti@ccpb.it; vincent.morel@ecocert.com; info@certisys.eu; direccionejecutiva@certimexsc.com; agroecologiauna@gmail.com; organic@clemson.edu; benzing@ceres-cert.com; mefraga@foodsafety.com.ar; amy.stafford@state.co.us; Nathalie.Boes@certisys.eu; joy.mccracken@georgiacrop.com; organic@controlunion.com; organic@clemson.edu; cvanhook77@earthlink.net; info.ecocertico@ecocert.com; amy.stafford@state.co.us; goabecky@centurylink.net; aude.bonnet@ecocert.com; dszalai@controlunion.com; camila@ibd.com.br; ep@ecoglobe.am; Jeffry.EVARD@ecocert.com; Jason.Laney@agri.idaho.gov; pdescamps@eco-logica.com; aude.bonnet@ecocert.com; Beatrice.Breuer@imo.ch; info@etko.org; nd@ecoglobe.am; Mary.nieland@iowaagriculture.gov; foodsafety@foodsafety.com.ar; pdescamps@eco-logica.com; p.perrone@icea.info; terry.hollifield@georgiacrop.com; ma@etko.org; Kristen.Branscum@ky.gov; info@globalculture.us; calidad@foodsafety.com.ar; herr@bcs-oeko.de; goaorg@centurylink.net; terry.hollifield@georgiacrop.com; a.moutapam@lacon-institut.org; lbd@lbd.com.br; globalculture@earthlink.net; monica@letis.org; Johanna.Phillips@agri.idaho.gov; goaorg@centurylink.net; scarlsen@co.marin.ca.us; imo@imo.ch; gwendal@ibd.com.br; juanantonio.mendoza@mayacert.com; info@ics-intl.com; Johanna.Phillips@agri.idaho.gov; spwalker@mosaorganic.org; maury.wills@iowaagriculture.gov; soh@imo.ch; wippl001@umn.edu; nop@icea.info; dawn@ics-intl.com; knewkirk@mofga.org; adam.watson@ky.gov; maury.wills@iowaagriculture.gov; etyanich@mt.gov; info@bcs-oeko.de; nop@icea.info; CarltonN@co.monterey.ca.us; lacon@lacon-institut.org; adam.watson@ky.gov; kirrilley.becker@nasaa.com.au; letis@letis.org; fischer@bcs-oeko.de; cfanta@naturesinternational.com; jstiles@marincounty.org; j.kopp@lacon-institut.org; jabbott@agri.nv.gov; FGIS OA, Maryland <Deanna.Baldwin@maryland.gov>; internacional@letis.org; Victoria.Smith@agr.nh.gov; info@mayacert.com; jstiles@marincounty.org; Daniel.wunderlich@ag.state.nj.us; mosa@mosaorganic.org; FGIS OA, Maryland <Deanna.Baldwin@maryland.gov>; SGerk@nmda.nmsu.edu; mncia@mncia.org; noe.rivera@mayacert.com; lisaengelbert@nofany.org; certification@mofga.org; cskolaski@mosaorganic.org; Bryan.Buchwald@ag.ok.gov; agrorganic@mt.gov; michelle.menken@mncia.org; leng@oda.state.or.us; agcomm@co.monterey.ca.us; yurlina@mofga.org; abrewster@ocia.org; sachin.ayachit@nasaa.com.au; gwebster@mt.gov; gestiondecalidad@oia.com.ar; nfccertification@gmail.com; Huntinggb@co.monterey.ca.us; hi.yoshida@omicnet.com; nics@naturesinternational.com; sachin.ayachit@nasaa.com.au; kyla@paorganic.org; Jennifer.Gornnert@agr.nh.gov; nfccertification@gmail.com; brian.mansfield@primuslabs.com; erich.bremer@ag.state.nj.us; dave@naturesinternational.com; byron.hamm@pro-cert.org; organic@nmda.nmsu.edu; ajepsson@agri.nv.gov; thughes@nsf.org; certifiedorganic@nofany.org; Jennifer.Gornnert@agr.nh.gov; ram@qcsinfo.org; organic@oeffa.org; erich.bremer@ag.state.nj.us; dkirsanovaphillips@scscertified.com; jeff.stearns@ag.ok.gov; bbakker@nmda.nmsu.edu; rhougaard@utah.gov; info@onecert.com; lori@nofany.org; Laura@nofavt.org; cid-organic@oda.state.or.us; andy@oeffa.org; srice@agr.wa.gov; organic@tilth.org; jeff.stearns@ag.ok.gov; john.young@yolocounty.org; info@occert.com; sam@onecert.com; xiao@ofdc.org.cn; kallen@oda.state.or.us; oia@oia.com.ar; connie@tilth.org; ocd@omicnet.com; susan@occert.com; pco@paorganic.org; celder@ocia.org; PrimusOrganic <PrimusOrganic@primuslabs.com>; xiao@ofdc.org.cn; info@pro-cert.org; pedroalanda@oia.com.ar; qai@qai-inc.com; ocd@omicnet.com; qcs@qcsinfo.org; leslie@paorganic.org; matt.green@dem.ri.gov; Deborah Mansfield <deborah.mansfield@primusauditingops.com>; organic@scsglobalservice.com; Dave.Lockman@pro-cert.org; Sally@Demeter-USA.org; irendon@nsf.org; Organic@TexasAgriculture.gov; robin@qcsinfo.org; (b) (6) @gmail.com; matt.green@dem.ri.gov; rlarsen@utah.gov; bnauman@scsglobalservices.com; Info@nofavt.org; Sally@Demeter-USA.org; organic@agr.wa.gov; Mary.Holliman@texasagriculture.gov; dennis.chambers@yolocounty.org; (b) (6) @gmail.com; rlarsen@utah.gov; Nicole@nofavt.org; bbook@agr.wa.gov; dennis.chambers@yolocounty.org

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

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The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

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What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

---

**From:** Don Franczyk <baystateorganic@earthlink.net>  
**Sent:** Friday, March 11, 2016 9:31 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hi Bridget,

Here is our hydroponic information. See below.

Don Franczyk  
Baystate Organic Certifiers

---

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

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The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? [We are willing to certify all three but currently only certify hydroponic operations.](#)

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? [4 hydroponic operations.](#)

In what state or country (if international) are the certified operations located (list)? CT, NJ, NY, OH

What crops do these certified operations produce (list)? Edible Flowers, Herbs, Greens, Lettuce, Microgreens, Wheatgrass

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Robin Schrieber <robin@qcsinfo.org>  
**Sent:** Thursday, March 10, 2016 5:53 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** Ryan  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Ms. McElroy,

QCS estimates that we currently certify roughly 4-5 operations that fall under the description provided below of "hydroponic, aquaponic, aeroponic and associated production systems." We do not track individual production systems of clients in our database, so the data is not very easy to pull.

We can try digging for more specific data as requested below (location of operation, type of product produced), if provided with some additional time, since it is not readily searchable in our current client database. Please let me know if this is acceptable, and needed, and by when we would need to respond.

Please be sure to cc our Crop Certification Manager, Ryan Brouillard (cc'd on this email), in your response. I am pregnant, and due this Sunday (March 13), so I may not be able to respond to email for a few weeks.

Kind Regards,

Robin Schrieber

Administrative Manager  
Quality Certification Services  
352.377.0133 | [www.qcsinfo.org](http://www.qcsinfo.org)

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**From:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **On Behalf Of** AMS - AIAinbox  
**Sent:** Tuesday, March 1, 2016 10:12 AM  
**To:** AMS - AIAinbox  
**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); Koble, Clinton - FSA, Reno, NV; [emel.erkar@bio-inspecta.com](mailto:emel.erkar@bio-inspecta.com); [central@biolatina.com](mailto:central@biolatina.com); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); [amalia.rueda@bioagricert.org](mailto:amalia.rueda@bioagricert.org); [admin@bio-inspecta.ch](mailto:admin@bio-inspecta.ch); [central@biolatina.com](mailto:central@biolatina.com); [Pat.Kennelly@cdph.ca.gov](mailto:Pat.Kennelly@cdph.ca.gov); [info@bioagricert.org](mailto:info@bioagricert.org); [julia.winter@bio-inspecta.ch](mailto:julia.winter@bio-inspecta.ch); [accreditation@ccof.org](mailto:accreditation@ccof.org); [Bolicert@megalink.com](mailto:Bolicert@megalink.com); [riccardo.cozzo@bioagricert.org](mailto:riccardo.cozzo@bioagricert.org); [calidad@certimexsc.com](mailto:calidad@certimexsc.com); [rporto@caae.es](mailto:rporto@caae.es); [Bolicert@bolicert.org](mailto:Bolicert@bolicert.org); [tom.nizet@certisys.eu](mailto:tom.nizet@certisys.eu); [ccof@ccof.org](mailto:ccof@ccof.org); [rporto@caae.es](mailto:rporto@caae.es); [saltmn@clemson.edu](mailto:saltmn@clemson.edu); [ccpb@ccpb.it](mailto:ccpb@ccpb.it); [Danny.Lee@cdfa.ca.gov](mailto:Danny.Lee@cdfa.ca.gov); [mitchell.yergert@state.co.us](mailto:mitchell.yergert@state.co.us); [certimex@certimexsc.com](mailto:certimex@certimexsc.com); Lewin Jake-FASConatct; [jvdschootbrugge@controlunion.com](mailto:jvdschootbrugge@controlunion.com); [ceres@ceres-cert.com](mailto:ceres@ceres-cert.com); [rsetti@ccpb.it](mailto:rsetti@ccpb.it); [vincent.morel@ecocert.com](mailto:vincent.morel@ecocert.com); [info@certisys.eu](mailto:info@certisys.eu); [direccionejecutiva@certimexsc.com](mailto:direccionejecutiva@certimexsc.com); [agroecologiauna@gmail.com](mailto:agroecologiauna@gmail.com); [organic@clemson.edu](mailto:organic@clemson.edu); [benzing@ceres-cert.com](mailto:benzing@ceres-cert.com); [mefraga@foodsafety.com.ar](mailto:mefraga@foodsafety.com.ar); [amy.stafford@state.co.us](mailto:amy.stafford@state.co.us); [Nathalie.Boes@certisys.eu](mailto:Nathalie.Boes@certisys.eu); [joy.mccracken@georgiacrop.com](mailto:joy.mccracken@georgiacrop.com); [organic@controlunion.com](mailto:organic@controlunion.com); [organic@clemson.edu](mailto:organic@clemson.edu); [cvanhook77@earthlink.net](mailto:cvanhook77@earthlink.net); [info.ecocertico@ecocert.com](mailto:info.ecocertico@ecocert.com); [amy.stafford@state.co.us](mailto:amy.stafford@state.co.us); [goabecky@centurylink.net](mailto:goabecky@centurylink.net); [aude.bonnet@ecocert.com](mailto:aude.bonnet@ecocert.com); [dszalai@controlunion.com](mailto:dszalai@controlunion.com); [camila@ibd.com.br](mailto:camila@ibd.com.br); [ep@ecoglobe.am](mailto:ep@ecoglobe.am); [Jeffry.EVARD@ecocert.com](mailto:Jeffry.EVARD@ecocert.com); [Jason.Laney@agri.idaho.gov](mailto:Jason.Laney@agri.idaho.gov); [pdescamps@eco-logica.com](mailto:pdescamps@eco-logica.com); [aude.bonnet@ecocert.com](mailto:aude.bonnet@ecocert.com); [Beatrice.Breuer@imo.ch](mailto:Beatrice.Breuer@imo.ch);

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[Organic@TexasAgriculture.gov](mailto:Organic@TexasAgriculture.gov); [robin@qcsinfo.org](mailto:robin@qcsinfo.org); [\(b\) \(6\)@gmail.com](mailto:(b) (6)@gmail.com); [matt.green@dem.ri.gov](mailto:matt.green@dem.ri.gov); [rlarsen@utah.gov](mailto:rlarsen@utah.gov); [bnauman@scsglobalservices.com](mailto:bnauman@scsglobalservices.com); [Info@nofavt.org](mailto:Info@nofavt.org); [Sally@Demeter-USA.org](mailto:Sally@Demeter-USA.org); [organic@agr.wa.gov](mailto:organic@agr.wa.gov); [Mary.Holliman@texasagriculture.gov](mailto:Mary.Holliman@texasagriculture.gov); [dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org); [\(b\) \(6\)@gmail.com](mailto:(b) (6)@gmail.com); [rlarsen@utah.gov](mailto:rlarsen@utah.gov); [Nicole@nofavt.org](mailto:Nicole@nofavt.org); [bbook@agr.wa.gov](mailto:bbook@agr.wa.gov); [dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets

- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Nune Darbinjan (b) (6) @yahoo.com>  
**Sent:** Wednesday, March 09, 2016 1:44 AM  
**To:** AMS - AIAinbox; Nune Darbinjan; McElroy, Bridget - AMS  
**Subject:** Re: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear NOP,

I would like to inform you that ECOGLOBE (EGLO) does not certify any hydroponic, aquaponic, aeroponic.

We are especially interested in any instruction and new approaches to this technologies by the NOP.

*Best regards, Ms. Nune Darbinyan  
Liebe Grüße, Frau Nune Darbinyan*

**Dr. Nune Darbinyan**  
**General Director**  
**ECOGLOBE**

---

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***Organic certification worldwide USA, Canada, EU, Switzerland  
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***Mind about environment before printing!***

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**From:** AMS - AIAinbox <AIAinbox@ams.usda.gov>  
**To:** AMS - AIAinbox <AIAinbox@ams.usda.gov>  
**Cc:** "admin@abeeorganic.com" <admin@abeeorganic.com>; "sarah@abeeorganic.com" <sarah@abeeorganic.com>; "ro@abeeorganic.com" <ro@abeeorganic.com>; "info@ascorganic.com" <info@ascorganic.com>; "Kat@ascorganic.com" <Kat@ascorganic.com>; "mfigueiras@argencert.com.ar" <mfigueiras@argencert.com.ar>; "americert@gmail.com" <americert@gmail.com>; "americert@gmail.com" <americert@gmail.com>; "organic@ausmeat.com.au" <organic@ausmeat.com.au>; "info@argencert.com.ar" <info@argencert.com.ar>; "lmontenegro@argencert.com.ar" <lmontenegro@argencert.com.ar>; "jorge.larranaga@aco.net.au" <jorge.larranaga@aco.net.au>; "organic@ausqual.com.au" <organic@ausqual.com.au>; "elise@ausqual.com.au" <elise@ausqual.com.au>; "dcox@baystateorganic.org" <dcox@baystateorganic.org>; "michael.baker@aco.net.au" <michael.baker@aco.net.au>; "michael.baker@aco.net.au" <michael.baker@aco.net.au>; "roxana.priego@biolatina.com.pe" <roxana.priego@biolatina.com.pe>; "baystateorganic@earthlink.net" <baystateorganic@earthlink.net>; "Koble, Clinton - FSA, Reno, NV" <clinton.koble@nv.usda.gov>; "emel.erkon@bio-inspecta.com" <emel.erkon@bio-inspecta.com>; "central@biolatina.com" <central@biolatina.com>; "baystateorganic@earthlink.net" <baystateorganic@earthlink.net>; "amalia.rueda@bioagricert.org" <amalia.rueda@bioagricert.org>; "admin@bio-inspecta.ch" <admin@bio-inspecta.ch>; "central@biolatina.com" <central@biolatina.com>; "Pat.Kennelly@cdph.ca.gov" <Pat.Kennelly@cdph.ca.gov>; "info@bioagricert.org"



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"direccionejecutiva@certimexsc.com" <direccionejecutiva@certimexsc.com>; "agroecologiauna@gmail.com" <agroecologiauna@gmail.com>; "organic@clemson.edu" <organic@clemson.edu>; "benzing@ceres-cert.com" <benzing@ceres-cert.com>; "mefraga@foodsafety.com.ar" <mefraga@foodsafety.com.ar>; "amy.stafford@state.co.us" <amy.stafford@state.co.us>; "Nathalie.Boes@certisys.eu" <Nathalie.Boes@certisys.eu>; "joy.mccracken@georgiacrop.com" <joy.mccracken@georgiacrop.com>; "organic@controlunion.com" <organic@controlunion.com>; "organic@clemson.edu" <organic@clemson.edu>; "cvanhook77@earthlink.net" <cvanhook77@earthlink.net>; "info.ecocertico@ecocert.com" <info.ecocertico@ecocert.com>; "amy.stafford@state.co.us" <amy.stafford@state.co.us>; "goabecky@centurylink.net" <goabecky@centurylink.net>; "aude.bonnet@ecocert.com" <aude.bonnet@ecocert.com>; "dszalai@controlunion.com" <dszalai@controlunion.com>; "camila@ibd.com.br" <camila@ibd.com.br>; "ep@ecoglobe.am" <ep@ecoglobe.am>; "Jeffry.EVARD@ecocert.com" <Jeffry.EVARD@ecocert.com>; "Jason.Laney@agri.idaho.gov" <Jason.Laney@agri.idaho.gov>; "pdescamps@eco-logica.com" <pdescamps@eco-logica.com>; "aude.bonnet@ecocert.com" <aude.bonnet@ecocert.com>; "Beatrice.Breuer@imo.ch" <Beatrice.Breuer@imo.ch>; "info@etko.org" <info@etko.org>; "nd@ecoglobe.am" <nd@ecoglobe.am>; "Mary.nieland@iowaagriculture.gov" <Mary.nieland@iowaagriculture.gov>; "foodsafety@foodsafety.com.ar" <foodsafety@foodsafety.com.ar>; "pdescamps@eco-logica.com" <pdescamps@eco-logica.com>; "p.perrone@icea.info" <p.perrone@icea.info>; "terry.hollifield@georgiacrop.com" <terry.hollifield@georgiacrop.com>; "ma@etko.org" <ma@etko.org>; "Kristen.Branscum@ky.gov" <Kristen.Branscum@ky.gov>; "info@globalculture.us" <info@globalculture.us>; "calidad@foodsafety.com.ar" <calidad@foodsafety.com.ar>; "herr@bcs-oeko.de" <herr@bcs-oeko.de>; "goaorg@centurylink.net" <goaorg@centurylink.net>; "terry.hollifield@georgiacrop.com" <terry.hollifield@georgiacrop.com>; "a.moutapam@lacon-institut.org" <a.moutapam@lacon-institut.org>; "lbd@lbd.com.br" <lbd@lbd.com.br>; "globalculture@earthlink.net" <globalculture@earthlink.net>; "monica@letis.org" <monica@letis.org>; "Johanna.Phillips@agri.idaho.gov" <Johanna.Phillips@agri.idaho.gov>; "goaorg@centurylink.net" <goaorg@centurylink.net>; "scarlsen@co.marin.ca.us" <scarlsen@co.marin.ca.us>; "imo@imo.ch" <imo@imo.ch>; "gwendal@ibd.com.br" <gwendal@ibd.com.br>; "juanantonio.mendoza@mayacert.com" <juanantonio.mendoza@mayacert.com>; "info@ics-intl.com" <info@ics-intl.com>; "Johanna.Phillips@agri.idaho.gov" <Johanna.Phillips@agri.idaho.gov>; "spwalker@mosaorganic.org" <spwalker@mosaorganic.org>; "maury.wills@iowaagriculture.gov" <maury.wills@iowaagriculture.gov>; "soh@imo.ch" <soh@imo.ch>; "wippl001@umn.edu" <wippl001@umn.edu>; "nop@icea.info" <nop@icea.info>; "dawn@ics-intl.com" <dawn@ics-intl.com>; "knewkirk@mofga.org" <knewkirk@mofga.org>; "adam.watson@ky.gov" <adam.watson@ky.gov>; "maury.wills@iowaagriculture.gov" <maury.wills@iowaagriculture.gov>; "etyanich@mt.gov" <etyanich@mt.gov>; "info@bcs-oeko.de" <info@bcs-oeko.de>; "nop@icea.info" <nop@icea.info>; "CarltonN@co.monterey.ca.us" <CarltonN@co.monterey.ca.us>; "lacon@lacon-institut.org" <lacon@lacon-institut.org>; "adam.watson@ky.gov" <adam.watson@ky.gov>; "kirriley.becker@nasaa.com.au" <kirriley.becker@nasaa.com.au>; "letis@letis.org" <letis@letis.org>; "fischer@bcs-oeko.de" <fischer@bcs-oeko.de>; "cfanta@naturesinternational.com" <cfanta@naturesinternational.com>; "jstiles@marincounty.org" <jstiles@marincounty.org>; "j.kopp@lacon-institut.org" <j.kopp@lacon-institut.org>; "jabbott@agri.nv.gov" <jabbott@agri.nv.gov>; "FGIS OA, Maryland" <Deanna.Baldwin@maryland.gov>; "internacional@letis.org" <internacional@letis.org>; "Victoria.Smith@agr.nh.gov" <Victoria.Smith@agr.nh.gov>; "info@mayacert.com" <info@mayacert.com>; "jstiles@marincounty.org" <jstiles@marincounty.org>; "Daniel.wunderlich@ag.state.nj.us" <Daniel.wunderlich@ag.state.nj.us>; "mosa@mosaorganic.org" <mosa@mosaorganic.org>; "FGIS OA, Maryland" <Deanna.Baldwin@maryland.gov>; "SGerk@nmda.nmsu.edu" <SGerk@nmda.nmsu.edu>; "mncia@mncia.org" <mncia@mncia.org>; "noe.rivera@mayacert.com" <noe.rivera@mayacert.com>; "lisaengelbert@nofany.org" <lisaengelbert@nofany.org>; "certification@mofga.org" <certification@mofga.org>; "cskolaski@mosaorganic.org" <cskolaski@mosaorganic.org>; "Bryan.Buchwald@ag.ok.gov" <Bryan.Buchwald@ag.ok.gov>; "agrorganic@mt.gov" <agrorganic@mt.gov>; "michelle.menken@mncia.org" <michelle.menken@mncia.org>; "leng@oda.state.or.us" <leng@oda.state.or.us>; "agcomm@co.monterey.ca.us" <agcomm@co.monterey.ca.us>; "yurlina@mofga.org" <yurlina@mofga.org>; "abrewster@ocia.org" <abrewster@ocia.org>; "sachin.ayachit@nasaa.com.au" <sachin.ayachit@nasaa.com.au>; "gwebster@mt.gov" <gwebster@mt.gov>; "gestiondecalidad@oia.com.ar" <gestiondecalidad@oia.com.ar>; "nfc certification@gmail.com" <nfc certification@gmail.com>; "Huntinggb@co.monterey.ca.us" <Huntinggb@co.monterey.ca.us>; "hi.yoshida@omicnet.com" <hi.yoshida@omicnet.com>; "nics@naturesinternational.com" <nics@naturesinternational.com>; 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**Sent:** Tuesday, March 1, 2016 6:11 PM

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)

- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 17, 2016 4:26 PM  
**To:** Emily Garcia  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Emily!

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**From:** Emily Garcia [mailto:Emily.Garcia@primusauditingops.com]  
**Sent:** Friday, March 11, 2016 1:48 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** PrimusOrganic ; AuditQA  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget,

Please see Primus Labs responses in **Red**:

1. Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **Yes, we certify hydroponic operations**
2. If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **28**
3. In what state or country (if international) are the certified operations located (list)?  
**California**  
**Mexico**
4. What crops do these certified operations produce (list)?  
**Raspberries**  
**Blueberries**  
**Butter lettuce**

Let me know if you have any questions.

Best,



**Emily Garcia**  
QA Specialist  
[Emily.Garcia@primusauditingops.com](mailto:Emily.Garcia@primusauditingops.com)  
Office 805.631.5248 | Direct Line 805.623.5542  
Fax 805.352.1364  
1259 Furukawa Way | Santa Maria | CA



**From:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **On Behalf Of** AMS - AIAinbox

**Sent:** Tuesday, March 01, 2016 7:12 AM

**To:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>

**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); Koble, Clinton - FSA, Reno, NV <[clinton.koble@nv.usda.gov](mailto:clinton.koble@nv.usda.gov)>; [emel.erkon@bio-inspecta.com](mailto:emel.erkon@bio-inspecta.com); [central@biolatina.com](mailto:central@biolatina.com); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); [amalia.rueda@bioagricert.org](mailto:amalia.rueda@bioagricert.org); [admin@bio-inspecta.ch](mailto:admin@bio-inspecta.ch); [central@biolatina.com](mailto:central@biolatina.com); [Pat.Kennelly@cdph.ca.gov](mailto:Pat.Kennelly@cdph.ca.gov); [info@bioagricert.org](mailto:info@bioagricert.org); [julia.winter@bio-inspecta.ch](mailto:julia.winter@bio-inspecta.ch); [accreditation@ccof.org](mailto:accreditation@ccof.org); [Bolicert@megalink.com](mailto:Bolicert@megalink.com); [riccardo.cozzo@bioagricert.org](mailto:riccardo.cozzo@bioagricert.org); [calidad@certimexsc.com](mailto:calidad@certimexsc.com); [rporto@caae.es](mailto:rporto@caae.es); [Bolicert@bolicert.org](mailto:Bolicert@bolicert.org); [tom.nizet@certisys.eu](mailto:tom.nizet@certisys.eu); [ccof@ccof.org](mailto:ccof@ccof.org); [rporto@caae.es](mailto:rporto@caae.es); [saltmn@clemson.edu](mailto:saltmn@clemson.edu); [ccpb@ccpb.it](mailto:ccpb@ccpb.it); [Danny.Lee@cdfa.ca.gov](mailto:Danny.Lee@cdfa.ca.gov); [mitchell.yergert@state.co.us](mailto:mitchell.yergert@state.co.us); [certimex@certimexsc.com](mailto:certimex@certimexsc.com); Lewin Jake-FASConatct <[jake@ccof.org](mailto:jake@ccof.org)>; [jvdschootbrugge@controlunion.com](mailto:jvdschootbrugge@controlunion.com); [ceres@ceres-cert.com](mailto:ceres@ceres-cert.com); [rsetti@ccpb.it](mailto:rsetti@ccpb.it); [vincent.morel@ecocert.com](mailto:vincent.morel@ecocert.com); [info@certisys.eu](mailto:info@certisys.eu); [direccionejecutiva@certimexsc.com](mailto:direccionejecutiva@certimexsc.com); [agroecologiauna@gmail.com](mailto:agroecologiauna@gmail.com); [organic@clemson.edu](mailto:organic@clemson.edu); [benzing@ceres-cert.com](mailto:benzing@ceres-cert.com); [mefraga@foodsafety.com.ar](mailto:mefraga@foodsafety.com.ar); [amy.stafford@state.co.us](mailto:amy.stafford@state.co.us); [Nathalie.Boes@certisys.eu](mailto:Nathalie.Boes@certisys.eu); [joy.mccracken@georgiacrop.com](mailto:joy.mccracken@georgiacrop.com); [organic@controlunion.com](mailto:organic@controlunion.com); [organic@clemson.edu](mailto:organic@clemson.edu); [cvanhook77@earthlink.net](mailto:cvanhook77@earthlink.net); [info.ecocertico@ecocert.com](mailto:info.ecocertico@ecocert.com); [amy.stafford@state.co.us](mailto:amy.stafford@state.co.us); [goabecky@centurylink.net](mailto:goabecky@centurylink.net); [aude.bonnet@ecocert.com](mailto:aude.bonnet@ecocert.com); [dszalai@controlunion.com](mailto:dszalai@controlunion.com); [camila@ibd.com.br](mailto:camila@ibd.com.br); [ep@ecoglobe.am](mailto:ep@ecoglobe.am); [Jeffry.EVARD@ecocert.com](mailto:Jeffry.EVARD@ecocert.com); [Jason.Laney@agri.idaho.gov](mailto:Jason.Laney@agri.idaho.gov); [pdescamps@eco-logica.com](mailto:pdescamps@eco-logica.com); 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**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,

Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Callyn Kircher <callyn@tilth.org>  
**Sent:** Tuesday, March 08, 2016 5:09 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** Re: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**Attachments:** USDAPonicsLetter3.2.16.pdf

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**Callyn Kircher**  *Farm Program Manager*

Oregon Tilth 2525 SE 3rd Street, Corvallis, OR 97333

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## Schurkamp, Lynnea - AMS

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**From:** Daniel Szalai <dszalai@controlunion.com>  
**Sent:** Tuesday, March 08, 2016 4:59 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Ms McElroy,

Please find CUC's answers below.

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? yes  
If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? 1  
In what state or country (if international) are the certified operations located (list)? The Netherlands  
What crops do these certified operations produce (list)? Peppers/Paprika

Kind regards,  
Daniel Szalai

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Dániel Szalai

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Control Union Certifications

OFFICE Meeuwenlaan 4-6, • Zwolle • The Netherlands

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**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox  
**Sent:** Tuesday, March 01, 2016 4:12 PM  
**To:** AMS - AIAinbox <AIAinbox@ams.usda.gov>  
**Cc:** admin@abeeorganic.com; sarah@abeeorganic.com; ro@abeeorganic.com; info@ascorganic.com; Kat@ascorganic.com; mfigueiras@argencert.com.ar; americert@gmail.com; americert@gmail.com; organic@ausmeat.com.au; info@argencert.com.ar; lmontenegro@argencert.com.ar; jorge.larranaga@aco.net.au; organic@ausqual.com.au; elise@ausqual.com.au; dcox@baystateorganic.org; michael.baker@aco.net.au; michael.baker@aco.net.au; roxana.priego@biolatina.com.pe; baystateorganic@earthlink.net; Koble, Clinton - FSA, Reno, NV <clinton.koble@nv.usda.gov>; emel.erkon@bio-inspecta.com; central@biolatina.com; baystateorganic@earthlink.net; amalia.rueda@bioagricert.org; admin@bio-inspecta.ch; central@biolatina.com; Pat.Kennelly@cdph.ca.gov; info@bioagricert.org; julia.winter@bio-inspecta.ch; accreditation@ccof.org; Bolicert@megalink.com; riccardo.cozzo@bioagricert.org; calidad@certimexsc.com; rporto@caae.es; Bolicert@bolicert.org; tom.nizet@certisys.eu; ccof@ccof.org; rporto@caae.es; saltmn@clemson.edu; ccpb@ccpb.it; Danny.Lee@cdfa.ca.gov; mitchell.yergert@state.co.us; certimex@certimexsc.com; Lewin Jake-FASConatct <jake@ccof.org>; Johan van de Schootbrugge <jvdschootbrugge@controlunion.com>; ceres@ceres-cert.com; rsetti@ccpb.it; vincent.morel@ecocert.com; info@certisys.eu; direccionejecutiva@certimexsc.com; agroecologiauna@gmail.com; organic@clemson.edu; benzing@ceres-cert.com; mefraga@foodsafety.com.ar;

amy.stafford@state.co.us; Nathalie.Boes@certisys.eu; joy.mccracken@georgiacrop.com; Organic <Organic@controlunion.com>; organic@clemson.edu; cvanhook77@earthlink.net; info.ecocertico@ecocert.com; amy.stafford@state.co.us; goabecky@centurylink.net; aude.bonnet@ecocert.com; Daniel Szalai <dszalai@controlunion.com>; camila@ibd.com.br; ep@ecoglobe.am; Jeffrey.EVARD@ecocert.com; Jason.Laney@agri.idaho.gov; pdescamps@eco-logica.com; aude.bonnet@ecocert.com; Beatrice.Breuer@imo.ch; info@etko.org; nd@ecoglobe.am; Mary.nieland@iowaagriculture.gov; foodsafety@foodsafety.com.ar; pdescamps@eco-logica.com; p.perrone@icea.info; terry.hollifield@georgiacrop.com; ma@etko.org; Kristen.Branscum@ky.gov; info@globalculture.us; calidad@foodsafety.com.ar; herr@bcs-oeko.de; goaorg@centurylink.net; terry.hollifield@georgiacrop.com; a.moutapam@lacon-institut.org; lbd@lbd.com.br; globalculture@earthlink.net; monica@letis.org; Johanna.Phillips@agri.idaho.gov; goaorg@centurylink.net; scarlsen@co.marin.ca.us; imo@imo.ch; gwendal@ibd.com.br; juanantonio.mendoza@mayacert.com; info@ics-intl.com; Johanna.Phillips@agri.idaho.gov; spwalker@mosaorganic.org; maury.wills@iowaagriculture.gov; soh@imo.ch; wipl001@umn.edu; nop@icea.info; dawn@ics-intl.com; knewkirk@mofga.org; adam.watson@ky.gov; maury.wills@iowaagriculture.gov; etyanich@mt.gov; info@bcs-oeko.de; nop@icea.info; CarltonN@co.monterey.ca.us; lacon@lacon-institut.org; adam.watson@ky.gov; kirrilley.becker@nasaa.com.au; letis@letis.org; fischer@bcs-oeko.de; cfanta@naturesinternational.com; jstiles@marincounty.org; j.kopp@lacon-institut.org; jabbott@agri.nv.gov; FGIS OA, Maryland <Deanna.Baldwin@maryland.gov>; internacional@letis.org; Victoria.Smith@agr.nh.gov; info@mayacert.com; jstiles@marincounty.org; Daniel.wunderlich@ag.state.nj.us; mosa@mosaorganic.org; FGIS OA, Maryland <Deanna.Baldwin@maryland.gov>; SGerk@nmda.nmsu.edu; mncia@mncia.org; noe.rivera@mayacert.com; lisaengelbert@nofany.org; certification@mofga.org; cskolaski@mosaorganic.org; Bryan.Buchwald@ag.ok.gov; agrorganic@mt.gov; michelle.menken@mncia.org; leng@oda.state.or.us; agcomm@co.monterey.ca.us; yurlina@mofga.org; abrewster@ocia.org; sachin.ayachit@nasaa.com.au; gwebster@mt.gov; gestiondecalidad@oia.com.ar; nfccertification@gmail.com; Huntinggb@co.monterey.ca.us; hi.yoshida@omicnet.com; nics@naturesinternational.com; sachin.ayachit@nasaa.com.au; kyla@paorganic.org; Jennifer.Gornnert@agr.nh.gov; nfccertification@gmail.com; brian.mansfield@primuslabs.com; erich.bremer@ag.state.nj.us; dave@naturesinternational.com; byron.hamm@pro-cert.org; organic@nmda.nmsu.edu; ajepson@agri.nv.gov; thughes@nsf.org; certifiedorganic@nofany.org; Jennifer.Gornnert@agr.nh.gov; ram@qcsinfo.org; organic@oeffa.org; erich.bremer@ag.state.nj.us; dkirsanovaphillips@scscertified.com; jeff.stearns@ag.ok.gov; bbakker@nmda.nmsu.edu; rhougaard@utah.gov; info@onecert.com; lori@nofany.org; Laura@nofavt.org; cid-organic@oda.state.or.us; andy@oeffa.org; srice@agr.wa.gov; organic@tilth.org; jeff.stearns@ag.ok.gov; john.young@yolocounty.org; info@occert.com; sam@onecert.com; xiao@ofdc.org.cn; kallen@oda.state.or.us; oia@oia.com.ar; connie@tilth.org; ocd@omicnet.com; susan@occert.com; pco@paorganic.org; celder@ocia.org; PrimusOrganic@primuslabs.com; xiao@ofdc.org.cn; info@pro-cert.org; pedroalanda@oia.com.ar; qai@qai-inc.com; ocd@omicnet.com; qcs@qcsinfo.org; leslie@paorganic.org; matt.green@dem.ri.gov; deborah.mansfield@primuslabs.com; organic@scsglobalservice.com; Dave.Lockman@pro-cert.org; Sally@Demeter-USA.org; irendon@nsf.org; Organic@TexasAgriculture.gov; robin@qcsinfo.org; (b) (6) @gmail.com; matt.green@dem.ri.gov; rlarsen@utah.gov; bnauman@scsglobalservices.com; Info@nofavt.org; Sally@Demeter-USA.org; organic@agr.wa.gov; Mary.Holliman@texasagriculture.gov; dennis.chambers@yolocounty.org; (b) (6) @gmail.com; rlarsen@utah.gov; Nicole@nofavt.org; bbook@agr.wa.gov; dennis.chambers@yolocounty.org

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Gornnert, Jennifer <Jennifer.Gornnert@agr.nh.gov>  
**Sent:** Wednesday, March 02, 2016 12:28 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget,

NH does not certify hydroponic or aquaponic operations.

Thank you,  
Jennifer

.....  
Jennifer Z. Gornnert, Director  
Division of Regulatory Services

NH Department of Agriculture, Markets & Food  
25 Capitol Street Room 218  
PO Box 2042  
Concord, NH 03302  
Tel-603.271.7761 Fax-603.271.1109  
[www.agriculture.nh.gov](http://www.agriculture.nh.gov)  
[Jennifer.Gornnert@agr.nh.gov](mailto:Jennifer.Gornnert@agr.nh.gov)

---

**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox  
**Sent:** Tuesday, March 01, 2016 10:12 AM  
**To:** AMS - AIAinbox  
**Cc:** admin@abeeorganic.com; sarah@abeeorganic.com; ro@abeeorganic.com; info@ascorganic.com; Kat@ascorganic.com; mfigueiras@argencert.com.ar; americert@gmail.com; americert@gmail.com; organic@ausmeat.com.au; info@argencert.com.ar; lmontenegro@argencert.com.ar; jorge.larranaga@aco.net.au; organic@ausqual.com.au; elise@ausqual.com.au; dcox@baystateorganic.org; michael.baker@aco.net.au; michael.baker@aco.net.au; roxana.priego@biolatina.com.pe; baystateorganic@earthlink.net; Koble, Clinton - FSA, Reno, NV; emel.erkar@bio-inspecta.com; central@biolatina.com; baystateorganic@earthlink.net; amalia.rueda@bioagricert.org; admin@bio-inspecta.ch; central@biolatina.com; Pat.Kennelly@cdph.ca.gov; info@bioagricert.org; julia.winter@bio-inspecta.ch; accreditation@ccof.org; Bolicert@megalink.com; riccardo.cozzo@bioagricert.org; calidad@certimexsc.com; rporto@caae.es; Bolicert@bolicert.org; tom.nizet@certisys.eu; ccof@ccof.org; rporto@caae.es; saltmn@clemson.edu; ccpb@ccpb.it; Danny.Lee@cdfa.ca.gov; mitchell.yergert@state.co.us; certimex@certimexsc.com; Lewin Jake-FASConatct; jvdschootbrugge@controlunion.com; ceres@ceres-cert.com; rsetti@ccpb.it; vincent.morel@ecocert.com; info@certisys.eu; direccionejecutiva@certimexsc.com; agroecologiauna@gmail.com; organic@clemson.edu; benzing@ceres-cert.com; mefraga@foodsafety.com.ar; amy.stafford@state.co.us; Nathalie.Boes@certisys.eu; joy.mccracken@georgiacrop.com; organic@controlunion.com; organic@clemson.edu; cvanhook77@earthlink.net; info.ecocertico@ecocert.com; amy.stafford@state.co.us; goabecky@centurylink.net; aude.bonnet@ecocert.com; dszalai@controlunion.com; camila@ibd.com.br; ep@ecoglobe.am; Jeffry.EVARD@ecocert.com; Jason.Laney@agri.idaho.gov; pdescamps@eco-logica.com; aude.bonnet@ecocert.com; Beatrice.Breuer@imo.ch; info@etko.org; nd@ecoglobe.am; Mary.nieland@iowaagriculture.gov; foodsafety@foodsafety.com.ar; pdescamps@eco-logica.com; p.perrone@icea.info; terry.hollifield@georgiacrop.com; ma@etko.org; Kristen.Branscum@ky.gov; info@globalculture.us; calidad@foodsafety.com.ar; herr@bcs-oeko.de; goaorg@centurylink.net; terry.hollifield@georgiacrop.com; a.moutapam@lacon-institut.org; lbd@lbd.com.br; globalculture@earthlink.net; monica@letis.org; Johanna.Phillips@agri.idaho.gov; goaorg@centurylink.net; scarlsen@co.marin.ca.us; imo@imo.ch; gwendal@ibd.com.br; juanantonio.mendoza@mayacert.com; info@ics-

intl.com; Johanna.Phillips@agri.idaho.gov; spwalker@mosaorganic.org; maury.wills@iowaagriculture.gov; soh@imo.ch; wippl001@umn.edu; nop@icea.info; dawn@ics-intl.com; knewkirk@mofga.org; adam.watson@ky.gov; maury.wills@iowaagriculture.gov; etyanich@mt.gov; info@bcs-oeko.de; nop@icea.info; CarltonN@co.monterey.ca.us; lacon@lacon-institut.org; adam.watson@ky.gov; kirriley.becker@nasaa.com.au; letis@letis.org; fischer@bcs-oeko.de; cfanta@nauresinternational.com; jstiles@marincounty.org; j.kopp@lacon-institut.org; jabbott@agri.nv.gov; FGIS OA, Maryland; internacional@letis.org; Smith, Victoria; info@mayacert.com; jstiles@marincounty.org; Daniel.wunderlich@ag.state.nj.us; mosa@mosaorganic.org; FGIS OA, Maryland; SGERK@nmda.nmsu.edu; mncia@mncia.org; noe.rivera@mayacert.com; lisaengelbert@nofany.org; certification@mofga.org; cskolaski@mosaorganic.org; Bryan.Buchwald@ag.ok.gov; agrorganic@mt.gov; michelle.menken@mncia.org; leng@oda.state.or.us; agcomm@co.monterey.ca.us; yurlina@mofga.org; abrewster@ocia.org; sachin.ayachit@nasaa.com.au; gwebster@mt.gov; gestiondecalidad@oia.com.ar; nfc certification@gmail.com; Huntinggb@co.monterey.ca.us; hi.yoshida@omicnet.com; nics@nauresinternational.com; sachin.ayachit@nasaa.com.au; kyla@paorganic.org; Gornnert, Jennifer; nfc certification@gmail.com; brian.mansfield@primuslabs.com; erich.bremer@ag.state.nj.us; dave@nauresinternational.com; byron.hamm@pro-cert.org; organic@nmda.nmsu.edu; ajepson@agri.nv.gov; thughes@nsf.org; certifiedorganic@nofany.org; Gornnert, Jennifer; ram@qcsinfo.org; organic@oeffa.org; erich.bremer@ag.state.nj.us; dkirsanovaphillips@scscertified.com; jeff.stearns@ag.ok.gov; bbakker@nmda.nmsu.edu; rhougaard@utah.gov; info@onecert.com; lori@nofany.org; Laura@nofavt.org; cid-organic@oda.state.or.us; andy@oeffa.org; srice@agr.wa.gov; organic@tilth.org; jeff.stearns@ag.ok.gov; john.young@yolocounty.org; info@occert.com; sam@onecert.com; xiao@ofdc.org.cn; kallen@oda.state.or.us; oia@oia.com.ar; connie@tilth.org; ocd@omicnet.com; susan@occert.com; pco@paorganic.org; celder@ocia.org; PrimusOrganic@primuslabs.com; xiao@ofdc.org.cn; info@pro-cert.org; pedroalanda@oia.com.ar; qai@qai-inc.com; ocd@omicnet.com; qcs@qcsinfo.org; leslie@paorganic.org; matt.green@dem.ri.gov; deborah.mansfield@primuslabs.com; organic@scsglobalservice.com; Dave.Lockman@pro-cert.org; Sally@Demeter-USA.org; irendon@nsf.org; Organic@TexasAgriculture.gov; robin@qcsinfo.org; (b) (6) @gmail.com; matt.green@dem.ri.gov; rlarsen@utah.gov; bnauman@scsglobalservices.com; Info@nofavt.org; Sally@Demeter-USA.org; organic@agr.wa.gov; Mary.Holliman@texasagriculture.gov; dennis.chambers@yolocounty.org; (b) (6) @gmail.com; rlarsen@utah.gov; Nicole@nofavt.org; bbook@agr.wa.gov; dennis.chambers@yolocounty.org

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

#### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

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- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics

- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? [No; not until we receive guidance from NOP.](#)

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

---

**From:** Andy Hupp <andy@oeffa.org>  
**Sent:** Tuesday, March 01, 2016 1:25 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** Maria Losh  
**Subject:** Re: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Greetings,

We do not certify any hydroponic, aquaponic, or aeroponic operations at this time.

Thanks,  
Andy

-----  
Andy Hupp  
Certification Program Manager  
Ohio Ecological Food & Farm Association  
<http://certification.oeffa.org/>

OEFFA Certification  
41 Croswell Road  
Columbus, OH 43214

Phone: 614.262.2022 x225 Fax: 614.421.2011  
-----

On 3/1/2016 10:11 AM, AMS - AIAinbox wrote:

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division  
Director of the USDA National Organic Program.

Dear Certifiers:

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Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Carlton, Nora x7314 <CarltonN@co.monterey.ca.us>  
**Sent:** Tuesday, March 01, 2016 1:16 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** Hunting, Graham B. x7391; Ordonez, Richard x7322  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Ms. McElroy,

Monterey County Certified Organic (MCCO) does not certify any hydroponic, aeroponic or aquaponic operations to the USDA organic standards.

Regards,

### **NORA CARLTON**

**AGRICULTURAL INSPECTOR/BIOLOGIST**

Monterey County Certified Organic (MCCO)

Monterey County Agricultural Commissioner's Office

Direct 831.759.7314 | Office 831.759.7340 | Fax 831.758.1290

---

**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox

**Sent:** Tuesday, March 01, 2016 7:12 AM

**To:** AMS - AIAinbox

**Cc:** admin@abeeorganic.com; sarah@abeeorganic.com; ro@abeeorganic.com; info@ascorganic.com; Kat@ascorganic.com; mfigueiras@argencert.com.ar; americert@gmail.com; americert@gmail.com; organic@ausmeat.com.au; info@argencert.com.ar; lmontenegro@argencert.com.ar; jorge.larranaga@aco.net.au; organic@ausqual.com.au; elise@ausqual.com.au; dcox@baystateorganic.org; michael.baker@aco.net.au; michael.baker@aco.net.au; roxana.priego@biolatina.com.pe; baystateorganic@earthlink.net; Koble, Clinton - FSA, Reno, NV; emel.erkar@bio-inspecta.com; central@biolatina.com; baystateorganic@earthlink.net; amalia.rueda@bioagricert.org; admin@bio-inspecta.ch; central@biolatina.com; Pat.Kennelly@cdph.ca.gov; info@bioagricert.org; julia.winter@bio-inspecta.ch; accreditation@ccof.org; Bolicert@megalink.com; riccardo.cozzo@bioagricert.org; calidad@certimexsc.com; rporto@caae.es; Bolicert@bolicert.org; tom.nizet@certisys.eu; ccof@ccof.org; rporto@caae.es; saltmn@clermson.edu; ccpb@ccpb.it; Danny.Lee@cdfa.ca.gov; mitchell.yergert@state.co.us; certimex@certimexsc.com; Lewin Jake-FASConatct; jvdschootbrugge@controlunion.com; ceres@ceres-cert.com; rsetti@ccpb.it; vincent.morel@ecocert.com; info@certisys.eu; direccionejecutiva@certimexsc.com; agroecologiauna@gmail.com; organic@clermson.edu; benzing@ceres-cert.com; mefraga@foodsafety.com.ar; amy.stafford@state.co.us; Nathalie.Boes@certisys.eu; joy.mccracken@georgiacrop.com; organic@controlunion.com; organic@clermson.edu; cvanhook77@earthlink.net; info.ecocertico@ecocert.com; amy.stafford@state.co.us; goabecky@centurylink.net; aude.bonnet@ecocert.com; dszalai@controlunion.com; camila@ibd.com.br; ep@ecoglobe.am; Jeffry.EVARD@ecocert.com; Jason.Laney@agri.idaho.gov; pdescamps@eco-logica.com; aude.bonnet@ecocert.com; Beatrice.Breuer@imo.ch; info@etko.org; nd@ecoglobe.am; Mary.nieland@iowaagriculture.gov; foodsafety@foodsafety.com.ar; pdescamps@eco-logica.com; p.perrone@icea.info; terry.hollifield@georgiacrop.com; ma@etko.org; Kristen.Branscum@ky.gov; info@globalculture.us; calidad@foodsafety.com.ar; herr@bcs-oeko.de; goaorg@centurylink.net; terry.hollifield@georgiacrop.com; a.moutapam@lacon-institut.org; lbd@lbd.com.br; globalculture@earthlink.net; monica@letis.org; Johanna.Phillips@agri.idaho.gov; goaorg@centurylink.net; scarlsen@co.marin.ca.us; imo@imo.ch; gwendal@ibd.com.br; juanantonio.mendoza@mayacert.com; info@ics-intl.com; Johanna.Phillips@agri.idaho.gov; spwalker@mosaorganic.org; maury.wills@iowaagriculture.gov; soh@imo.ch; wipl001@umn.edu; nop@icea.info; dawn@ics-intl.com; knewkirk@mofga.org; adam.watson@ky.gov; maury.wills@iowaagriculture.gov; etyanich@mt.gov; info@bcs-oeko.de; nop@icea.info; Carlton, Nora x7314; lacon@lacon-institut.org; adam.watson@ky.gov; kirrilley.becker@nasaa.com.au; letis@letis.org; fischer@bcs-oeko.de; cfanta@naturesinternational.com; jstiles@marincounty.org; j.kopp@lacon-institut.org; jabbott@agri.nv.gov; FGIS OA, Maryland; internacional@letis.org;

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**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

#### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

#### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 17, 2016 4:25 PM  
**To:** Don Franczyk  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Don!

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**From:** Don Franczyk [mailto:baystateorganic@earthlink.net]  
**Sent:** Friday, March 11, 2016 9:31 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hi Bridget,

Here is our hydroponic information. See below.

Don Franczyk  
Baystate Organic Certifiers

---

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? [We are willing to certify all three but currently only certify hydroponic operations.](#)

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? [4 hydroponic operations.](#)

In what state or country (if international) are the certified operations located (list)? [CT, NJ, NY, OH](#)

What crops do these certified operations produce (list)? [Edible Flowers, Herbs, Greens, Lettuce, Microgreens, Wheatgrass](#)

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Roberto Setti <rsetti@ccpb.it>  
**Sent:** Tuesday, March 01, 2016 11:17 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** Re: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

**Importance:** High

Dear Bridget,

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **NO**

Kind regards

rs

Roberto Setti  
Techn. Dept. & Q.A. Manager  
CCPB SRL  
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tel: +39-051-6089811  
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**From:** [AMS - AIAinbox](#)

**Sent:** Tuesday, March 01, 2016 4:11 PM

**To:** [AMS - AIAinbox](#)

**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com) ; [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com) ; [ro@abeeorganic.com](mailto:ro@abeeorganic.com) ; [info@ascorganic.com](mailto:info@ascorganic.com) ; [Kat@ascorganic.com](mailto:Kat@ascorganic.com) ; [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar) ; [americert@gmail.com](mailto:americert@gmail.com) ; [americert@gmail.com](mailto:americert@gmail.com) ; [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au) ; [info@argencert.com.ar](mailto:info@argencert.com.ar) ; [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar) ; [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au) ; [organic@ausqual.com.au](mailto:organic@ausqual.com.au) ; [elise@ausqual.com.au](mailto:elise@ausqual.com.au) ; [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org) ; [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au) ; [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe) ; [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net) ; [Koble, Clinton - FSA, Reno, NV](mailto:Koble, Clinton - FSA, Reno, NV) ; [emel.erkar@bio-inspecta.com](mailto:emel.erkar@bio-inspecta.com) ; [central@biolatina.com](mailto:central@biolatina.com) ; [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net) ; [amalia.rueda@bioagricert.org](mailto:amalia.rueda@bioagricert.org) ; [admin@bio-inspecta.ch](mailto:admin@bio-inspecta.ch) ; [central@biolatina.com](mailto:central@biolatina.com) ; [Pat.Kennelly@cdph.ca.gov](mailto:Pat.Kennelly@cdph.ca.gov) ; [info@bioagricert.org](mailto:info@bioagricert.org) ; [julia.winter@bio-inspecta.ch](mailto:julia.winter@bio-inspecta.ch) ; [accreditation@ccof.org](mailto:accreditation@ccof.org) ; [Bolicert@megalink.com](mailto:Bolicert@megalink.com) ;



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[dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org) ; [\(b\) \(6\)@gmail.com](mailto:(b) (6)@gmail.com) ; [rlarsen@utah.gov](mailto:rlarsen@utah.gov) ; [Nicole@nofavt.org](mailto:Nicole@nofavt.org) ; [bbook@agr.wa.gov](mailto:bbook@agr.wa.gov) ;  
[dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

#### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both

systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Mann, Renee - AMS  
**Sent:** Tuesday, March 01, 2016 11:00 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

It went to the 80 accredited certifiers, and the California State Organic Program (so they know what we're asking of the certifiers).

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

---

**From:** McElroy, Bridget - AMS  
**Sent:** Tuesday, March 01, 2016 10:55 AM  
**To:** Mann, Renee - AMS <Renee.Mann@ams.usda.gov>  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Oh, how many ACAs total did it go to?

---

**From:** Mann, Renee - AMS  
**Sent:** Tuesday, March 01, 2016 10:35 AM  
**To:** McElroy, Bridget - AMS <[Bridget.McElroy@ams.usda.gov](mailto:Bridget.McElroy@ams.usda.gov)>  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

FYI

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
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**From:** Baron, Anne - AMS  
**Sent:** Tuesday, March 01, 2016 10:29 AM  
**To:** Courtney, Cheri - AMS <[Cheri.Courtney@ams.usda.gov](mailto:Cheri.Courtney@ams.usda.gov)>; Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>; Gebault King, ReneeA - AMS <[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)>; Lopez, JasonJ - AMS <[JasonJ.Lopez@ams.usda.gov](mailto:JasonJ.Lopez@ams.usda.gov)>; Lusby, MaryLou - AMS <[MaryLou.Lusby@ams.usda.gov](mailto:MaryLou.Lusby@ams.usda.gov)>; Mann, Renee - AMS <[Renee.Mann@ams.usda.gov](mailto:Renee.Mann@ams.usda.gov)>; Yang, RobertH - AMS <[RobertH.Yang@ams.usda.gov](mailto:RobertH.Yang@ams.usda.gov)>; Zuck, Penelope - AMS <[Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)>; Adams, Edith - AMS <[Edith.Adams@ams.usda.gov](mailto:Edith.Adams@ams.usda.gov)>; Caceres, Miguel - AMS <[Miguel.Caceres@ams.usda.gov](mailto:Miguel.Caceres@ams.usda.gov)>; Friesenhahn, Martin - AMS <[Martin.Friesenhahn@ams.usda.gov](mailto:Martin.Friesenhahn@ams.usda.gov)>; Gilbert, Corey - AMS <[Corey.Gilbert@ams.usda.gov](mailto:Corey.Gilbert@ams.usda.gov)>; Heckart, Patricia - AMS <[Patricia.Heckart@ams.usda.gov](mailto:Patricia.Heckart@ams.usda.gov)>; Hildreth, David - AMS <[David.Hildreth@ams.usda.gov](mailto:David.Hildreth@ams.usda.gov)>; Horne, Willy - AMS <[Willy.Horne@ams.usda.gov](mailto:Willy.Horne@ams.usda.gov)>; Kohles, Alan - AMS <[Alan.Kohles@ams.usda.gov](mailto:Alan.Kohles@ams.usda.gov)>; Lopez, Mike - AMS <[Mike.Lopez@ams.usda.gov](mailto:Mike.Lopez@ams.usda.gov)>; Matejovsky, Kathryn - AMS <[Kathryn.Matejovsky@ams.usda.gov](mailto:Kathryn.Matejovsky@ams.usda.gov)>; Ross, Steve - AMS <[Steve.Ross@ams.usda.gov](mailto:Steve.Ross@ams.usda.gov)>; Schoop, Jamie - AMS <[Jamie.Schoop@ams.usda.gov](mailto:Jamie.Schoop@ams.usda.gov)>; Skinner, Rick - AMS <[Rick.Skinner@ams.usda.gov](mailto:Rick.Skinner@ams.usda.gov)>; Wilson, Darrell - AMS <[Darrell.Wilson@ams.usda.gov](mailto:Darrell.Wilson@ams.usda.gov)>; Gebel, Kelley - AMS

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**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear AIA staff, NOP Management Team and QAD auditors,

Please find below the message sent to the certifiers.  
Let us know if you have any questions.

Regards,  
Alvik Joseph

---

**From:** Baron , Anne - AMS **On Behalf Of** AMS - AIAinbox

**Sent:** Tuesday, March 01, 2016 10:12 AM

**To:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>

**Cc:** 'admin@abeeorganic.com' <[admin@abeeorganic.com](mailto:admin@abeeorganic.com)>; 'sarah@abeeorganic.com' <[sarah@abeeorganic.com](mailto:sarah@abeeorganic.com)>; 'ro@abeeorganic.com' <[ro@abeeorganic.com](mailto:ro@abeeorganic.com)>; 'info@ascorganic.com' <[info@ascorganic.com](mailto:info@ascorganic.com)>; 'Kat@ascorganic.com' <[Kat@ascorganic.com](mailto:Kat@ascorganic.com)>; 'mfigueiras@argencert.com.ar' <[mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar)>; 'americert@gmail.com' <[americert@gmail.com](mailto:americert@gmail.com)>; 'americert@gmail.com' <[americert@gmail.com](mailto:americert@gmail.com)>; 'organic@ausmeat.com.au' <[organic@ausmeat.com.au](mailto:organic@ausmeat.com.au)>; 'info@argencert.com.ar' <[info@argencert.com.ar](mailto:info@argencert.com.ar)>; 'lmontenegro@argencert.com.ar' <[lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar)>; 'jorge.larranaga@aco.net.au' <[jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au)>; 'organic@ausqual.com.au' <[organic@ausqual.com.au](mailto:organic@ausqual.com.au)>; 'elise@ausqual.com.au' <[elise@ausqual.com.au](mailto:elise@ausqual.com.au)>; 'dcox@baystateorganic.org' <[dcox@baystateorganic.org](mailto:dcox@baystateorganic.org)>; 'michael.baker@aco.net.au' <[michael.baker@aco.net.au](mailto:michael.baker@aco.net.au)>; 'michael.baker@aco.net.au' <[michael.baker@aco.net.au](mailto:michael.baker@aco.net.au)>; 'roxana.priego@biolatina.com.pe' <[roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe)>; 'baystateorganic@earthlink.net' <[baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net)>; Koble, Clinton - FSA, Reno, NV <[clinton.koble@nv.usda.gov](mailto:clinton.koble@nv.usda.gov)>; 'emel.erkon@bio-inspecta.com' <[emel.erkon@bio-inspecta.com](mailto:emel.erkon@bio-inspecta.com)>; 'central@biolatina.com' <[central@biolatina.com](mailto:central@biolatina.com)>; 'baystateorganic@earthlink.net' <[baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net)>; 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'tom.nizet@certisys.eu' <[tom.nizet@certisys.eu](mailto:tom.nizet@certisys.eu)>; 'ccof@ccof.org' <[ccof@ccof.org](mailto:ccof@ccof.org)>; 'rporto@caae.es' <[rporto@caae.es](mailto:rporto@caae.es)>; 'saltmn@clemson.edu' <[saltmn@clemson.edu](mailto:saltmn@clemson.edu)>; 'ccpb@ccpb.it' <[ccpb@ccpb.it](mailto:ccpb@ccpb.it)>; 'Danny.Lee@cdfa.ca.gov' <[Danny.Lee@cdfa.ca.gov](mailto:Danny.Lee@cdfa.ca.gov)>; 'mitchell.yergert@state.co.us' <[mitchell.yergert@state.co.us](mailto:mitchell.yergert@state.co.us)>; 'certimex@certimexsc.com' <[certimex@certimexsc.com](mailto:certimex@certimexsc.com)>; Lewin Jake-FASConatct <[jake@ccof.org](mailto:jake@ccof.org)>; 'jvdschootbrugge@controlunion.com' <[jvdschootbrugge@controlunion.com](mailto:jvdschootbrugge@controlunion.com)>; 'ceres@ceres-cert.com' <[ceres@ceres-cert.com](mailto:ceres@ceres-cert.com)>; 'rsetti@ccpb.it' <[rsetti@ccpb.it](mailto:rsetti@ccpb.it)>; 'vincent.morel@ecocert.com' <[vincent.morel@ecocert.com](mailto:vincent.morel@ecocert.com)>; 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<[nd@ecoglobe.am](mailto:nd@ecoglobe.am)>; 'Mary.nieland@iowaagriculture.gov' <[Mary.nieland@iowaagriculture.gov](mailto:Mary.nieland@iowaagriculture.gov)>;  
'foodsafety@foodsafety.com.ar' <[foodsafety@foodsafety.com.ar](mailto:foodsafety@foodsafety.com.ar)>; 'pdescamps@eco-logica.com' <[pdescamps@eco-logica.com](mailto:pdescamps@eco-logica.com)>;  
'p.perrone@icea.info' <[p.perrone@icea.info](mailto:p.perrone@icea.info)>; 'terry.hollifield@georgiacrop.com'  
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'globalculture@earthlink.net' <[globalculture@earthlink.net](mailto:globalculture@earthlink.net)>; 'monica@letis.org' <[monica@letis.org](mailto:monica@letis.org)>;  
'Johanna.Phillips@agri.idaho.gov' <[Johanna.Phillips@agri.idaho.gov](mailto:Johanna.Phillips@agri.idaho.gov)>; 'goaorg@centurylink.net'  
<[goaorg@centurylink.net](mailto:goaorg@centurylink.net)>; 'scarsen@co.marin.ca.us'; 'imo@imo.ch' <[imo@imo.ch](mailto:imo@imo.ch)>; 'gwendal@ibd.com.br'  
<[gwendal@ibd.com.br](mailto:gwendal@ibd.com.br)>; 'juanantonio.mendoza@mayacert.com' <[juanantonio.mendoza@mayacert.com](mailto:juanantonio.mendoza@mayacert.com)>; 'info@ics-intl.com'  
<[info@ics-intl.com](mailto:info@ics-intl.com)>; 'Johanna.Phillips@agri.idaho.gov' <[Johanna.Phillips@agri.idaho.gov](mailto:Johanna.Phillips@agri.idaho.gov)>;  
'spwalker@mosaorganic.org' <[spwalker@mosaorganic.org](mailto:spwalker@mosaorganic.org)>; 'maury.wills@iowaagriculture.gov'  
<[maury.wills@iowaagriculture.gov](mailto:maury.wills@iowaagriculture.gov)>; 'soh@imo.ch' <[soh@imo.ch](mailto:soh@imo.ch)>; 'wippl001@umn.edu' <[wippl001@umn.edu](mailto:wippl001@umn.edu)>;  
'nop@icea.info' <[nop@icea.info](mailto:nop@icea.info)>; 'dawn@ics-intl.com' <[dawn@ics-intl.com](mailto:dawn@ics-intl.com)>; 'knewkirk@mofga.org'  
<[knewkirk@mofga.org](mailto:knewkirk@mofga.org)>; 'adam.watson@ky.gov' <[adam.watson@ky.gov](mailto:adam.watson@ky.gov)>; 'maury.wills@iowaagriculture.gov'  
<[maury.wills@iowaagriculture.gov](mailto:maury.wills@iowaagriculture.gov)>; 'etyanich@mt.gov' <[etyanich@mt.gov](mailto:etyanich@mt.gov)>; 'info@bcs-oeko.de' <[info@bcs-oeko.de](mailto:info@bcs-oeko.de)>;  
'nop@icea.info' <[nop@icea.info](mailto:nop@icea.info)>; 'CarltonN@co.monterey.ca.us' <[CarltonN@co.monterey.ca.us](mailto:CarltonN@co.monterey.ca.us)>; 'lacon@lacon-institut.org'  
<[lacon@lacon-institut.org](mailto:lacon@lacon-institut.org)>; 'adam.watson@ky.gov' <[adam.watson@ky.gov](mailto:adam.watson@ky.gov)>;  
'kirrilley.becker@nasaa.com.au' <[kirrilley.becker@nasaa.com.au](mailto:kirrilley.becker@nasaa.com.au)>; 'letis@letis.org' <[letis@letis.org](mailto:letis@letis.org)>; 'fischer@bcs-oeko.de'  
<[fischer@bcs-oeko.de](mailto:fischer@bcs-oeko.de)>; 'cfanta@naturesinternational.com' <[cfanta@naturesinternational.com](mailto:cfanta@naturesinternational.com)>;  
'jstiles@marincounty.org' <[jstiles@marincounty.org](mailto:jstiles@marincounty.org)>; 'j.kopp@lacon-institut.org' <[j.kopp@lacon-institut.org](mailto:j.kopp@lacon-institut.org)>;  
'jabbott@agri.nv.gov' <[jabbott@agri.nv.gov](mailto:jabbott@agri.nv.gov)>; FGIS OA, Maryland <[Deanna.Baldwin@maryland.gov](mailto:Deanna.Baldwin@maryland.gov)>;  
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'info@mayacert.com' <[info@mayacert.com](mailto:info@mayacert.com)>; 'jstiles@marincounty.org' <[jstiles@marincounty.org](mailto:jstiles@marincounty.org)>;  
'Daniel.wunderlich@ag.state.nj.us' <[Daniel.wunderlich@ag.state.nj.us](mailto:Daniel.wunderlich@ag.state.nj.us)>; 'mosa@mosaorganic.org'  
<[mosa@mosaorganic.org](mailto:mosa@mosaorganic.org)>; FGIS OA, Maryland <[Deanna.Baldwin@maryland.gov](mailto:Deanna.Baldwin@maryland.gov)>; 'SGerk@nmda.nmsu.edu'  
<[SGerk@nmda.nmsu.edu](mailto:SGerk@nmda.nmsu.edu)>; 'mncia@mncia.org' <[mncia@mncia.org](mailto:mncia@mncia.org)>; 'noe.rivera@mayacert.com'  
<[noe.rivera@mayacert.com](mailto:noe.rivera@mayacert.com)>; 'lisaengelbert@nofany.org' <[lisaengelbert@nofany.org](mailto:lisaengelbert@nofany.org)>; 'certification@mofga.org'  
<[certification@mofga.org](mailto:certification@mofga.org)>; 'cskolaski@mosaorganic.org' <[cskolaski@mosaorganic.org](mailto:cskolaski@mosaorganic.org)>; 'Bryan.Buchwald@ag.ok.gov'  
<[Bryan.Buchwald@ag.ok.gov](mailto:Bryan.Buchwald@ag.ok.gov)>; 'agrorganic@mt.gov' <[agrorganic@mt.gov](mailto:agrorganic@mt.gov)>; 'michelle.menken@mncia.org'  
<[michelle.menken@mncia.org](mailto:michelle.menken@mncia.org)>; 'leng@oda.state.or.us' <[leng@oda.state.or.us](mailto:leng@oda.state.or.us)>; 'agcomm@co.monterey.ca.us'  
<[agcomm@co.monterey.ca.us](mailto:agcomm@co.monterey.ca.us)>; 'yurlina@mofga.org' <[yurlina@mofga.org](mailto:yurlina@mofga.org)>; 'abrewster@ocia.org'  
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<[nfc certification@gmail.com](mailto:nfc certification@gmail.com)>; 'Huntinggb@co.monterey.ca.us' <[Huntinggb@co.monterey.ca.us](mailto:Huntinggb@co.monterey.ca.us)>;  
'hi.yoshida@omicnet.com' <[hi.yoshida@omicnet.com](mailto:hi.yoshida@omicnet.com)>; 'nics@naturesinternational.com'  
<[nics@naturesinternational.com](mailto:nics@naturesinternational.com)>; 'sachin.ayachit@nasaa.com.au' <[sachin.ayachit@nasaa.com.au](mailto:sachin.ayachit@nasaa.com.au)>;  
'kyla@paorganic.org' <[kyla@paorganic.org](mailto:kyla@paorganic.org)>; 'Jennifer.Gornnert@agr.nh.gov' <[Jennifer.Gornnert@agr.nh.gov](mailto:Jennifer.Gornnert@agr.nh.gov)>;  
'nfc certification@gmail.com' <[nfc certification@gmail.com](mailto:nfc certification@gmail.com)>; 'brian.mansfield@primuslabs.com'  
<[brian.mansfield@primuslabs.com](mailto:brian.mansfield@primuslabs.com)>; 'erich.bremer@ag.state.nj.us' <[erich.bremer@ag.state.nj.us](mailto:erich.bremer@ag.state.nj.us)>;  
'dave@naturesinternational.com' <[dave@naturesinternational.com](mailto:dave@naturesinternational.com)>; 'byron.hamm@pro-cert.org' <[byron.hamm@pro-cert.org](mailto:byron.hamm@pro-cert.org)>;  
'organic@nmda.nmsu.edu' <[organic@nmda.nmsu.edu](mailto:organic@nmda.nmsu.edu)>; 'ajeppson@agri.nv.gov' <[ajeppson@agri.nv.gov](mailto:ajeppson@agri.nv.gov)>;  
'thughes@nsf.org' <[thughes@nsf.org](mailto:thughes@nsf.org)>; 'certifiedorganic@nofany.org' <[certifiedorganic@nofany.org](mailto:certifiedorganic@nofany.org)>;  
'Jennifer.Gornnert@agr.nh.gov' <[Jennifer.Gornnert@agr.nh.gov](mailto:Jennifer.Gornnert@agr.nh.gov)>; 'ram@qcsinfo.org' <[ram@qcsinfo.org](mailto:ram@qcsinfo.org)>;  
'organic@oeffa.org' <[organic@oeffa.org](mailto:organic@oeffa.org)>; 'erich.bremer@ag.state.nj.us' <[erich.bremer@ag.state.nj.us](mailto:erich.bremer@ag.state.nj.us)>;  
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'Laura@nofavt.org' <[Laura@nofavt.org](mailto:Laura@nofavt.org)>; 'cid-organic@oda.state.or.us' <[cid-organic@oda.state.or.us](mailto:cid-organic@oda.state.or.us)>; 'andy@oeffa.org' <[andy@oeffa.org](mailto:andy@oeffa.org)>; 'srice@agr.wa.gov' <[srice@agr.wa.gov](mailto:srice@agr.wa.gov)>; 'organic@tilth.org' <[organic@tilth.org](mailto:organic@tilth.org)>; 'jeff.stearns@ag.ok.gov' <[jeff.stearns@ag.ok.gov](mailto:jeff.stearns@ag.ok.gov)>; [john.young@yolocounty.org](mailto:john.young@yolocounty.org); 'info@occert.com' <[info@occert.com](mailto:info@occert.com)>; 'sam@onecert.com' <[sam@onecert.com](mailto:sam@onecert.com)>; 'xiao@ofdc.org.cn' <[xiao@ofdc.org.cn](mailto:xiao@ofdc.org.cn)>; 'kallen@oda.state.or.us' <[kallen@oda.state.or.us](mailto:kallen@oda.state.or.us)>; 'oia@oia.com.ar' <[oia@oia.com.ar](mailto:oia@oia.com.ar)>; 'connie@tilth.org' <[connie@tilth.org](mailto:connie@tilth.org)>; 'ocd@omicnet.com' <[ocd@omicnet.com](mailto:ocd@omicnet.com)>; 'susan@occert.com' <[susan@occert.com](mailto:susan@occert.com)>; 'pco@paorganic.org' <[pco@paorganic.org](mailto:pco@paorganic.org)>; 'celder@ocia.org' <[celder@ocia.org](mailto:celder@ocia.org)>; 'PrimusOrganic@primuslabs.com' <[PrimusOrganic@primuslabs.com](mailto:PrimusOrganic@primuslabs.com)>; 'xiao@ofdc.org.cn' <[xiao@ofdc.org.cn](mailto:xiao@ofdc.org.cn)>; 'info@pro-cert.org' <[info@pro-cert.org](mailto:info@pro-cert.org)>; 'pedroalanda@oia.com.ar' <[pedroalanda@oia.com.ar](mailto:pedroalanda@oia.com.ar)>; 'qai@qai-inc.com' <[qai@qai-inc.com](mailto:qai@qai-inc.com)>; 'ocd@omicnet.com' <[ocd@omicnet.com](mailto:ocd@omicnet.com)>; 'qcs@qcsinfo.org' <[qcs@qcsinfo.org](mailto:qcs@qcsinfo.org)>; [leslie@paorganic.org](mailto:leslie@paorganic.org); [matt.green@dem.ri.gov](mailto:matt.green@dem.ri.gov); 'deborah.mansfield@primuslabs.com' <[deborah.mansfield@primuslabs.com](mailto:deborah.mansfield@primuslabs.com)>; 'organic@scsglobalservice.com' <[organic@scsglobalservice.com](mailto:organic@scsglobalservice.com)>; 'Dave.Lockman@pro-cert.org' <[Dave.Lockman@pro-cert.org](mailto:Dave.Lockman@pro-cert.org)>; 'Sally@Demeter-USA.org' <[Sally@Demeter-USA.org](mailto:Sally@Demeter-USA.org)>; 'irendon@nsf.org' <[irendon@nsf.org](mailto:irendon@nsf.org)>; 'Organic@TexasAgriculture.gov' <[Organic@TexasAgriculture.gov](mailto:Organic@TexasAgriculture.gov)>; 'robin@qcsinfo.org' <[robin@qcsinfo.org](mailto:robin@qcsinfo.org)>; 'Toaf007@gmail.com' <[Toaf007@gmail.com](mailto:Toaf007@gmail.com)>; [matt.green@dem.ri.gov](mailto:matt.green@dem.ri.gov); 'rlarsen@utah.gov' <[rlarsen@utah.gov](mailto:rlarsen@utah.gov)>; 'bnauman@scsglobalservices.com' <[bnauman@scsglobalservices.com](mailto:bnauman@scsglobalservices.com)>; 'Info@nofavt.org' <[Info@nofavt.org](mailto:Info@nofavt.org)>; 'Sally@Demeter-USA.org' <[Sally@Demeter-USA.org](mailto:Sally@Demeter-USA.org)>; 'organic@agr.wa.gov' <[organic@agr.wa.gov](mailto:organic@agr.wa.gov)>; 'Mary.Holliman@texasagriculture.gov' <[Mary.Holliman@texasagriculture.gov](mailto:Mary.Holliman@texasagriculture.gov)>; 'dennis.chambers@yolocounty.org' <[dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)>; '(b) (6) @gmail.com' <(b) (6) @gmail.com>; 'rlarsen@utah.gov' <[rlarsen@utah.gov](mailto:rlarsen@utah.gov)>; 'Nicole@nofavt.org' <[Nicole@nofavt.org](mailto:Nicole@nofavt.org)>; 'bbook@agr.wa.gov' <[bbook@agr.wa.gov](mailto:bbook@agr.wa.gov)>; 'dennis.chambers@yolocounty.org' <[dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)>

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

#### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

#### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

## Schurkamp, Lynnea - AMS

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**From:** Nathalie Boes <nathalie.boes@certisys.eu>  
**Sent:** Tuesday, March 01, 2016 10:30 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** Re: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear,

Certisys does not certify hydroponic or aeroponic operations.

Best regards,

**Nathalie BOES**  
QUALITY DEPARTMENT



TEL +32(0)81 600 377 | FAX +32(0)81 600 313  
nathalie.boes@certisys.eu | [www.certisys.eu](http://www.certisys.eu)

I am out of office on Monday afternoon, Wednesday and Friday for urgent matters please contact [quality@certisys.eu](mailto:quality@certisys.eu)  
Le 1/03/2016 16:11, AMS - AIAinbox a écrit :

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division  
Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

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- Aeroponics
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**Questions for Certifying Agents:**

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If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

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What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 17, 2016 4:20 PM  
**To:** Rendon, Iris  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hi Iris,

I am going through a whole lot of emails in the order that they came in, so I didn't see your second one until now. I will use this updated information.

Thank you again for your help.

Bridget

---

**From:** Rendon, Iris [mailto:irendon@gftc.ca]  
**Sent:** Thursday, March 10, 2016 4:12 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello,

I had submitted a response to this inquiry earlier, however, some corrections have been made by the technical team. Please accept this response and disregard the previous email on this subject.  
Thank you and best regards.

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **Yes**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **Eight, however, please see attachment with comments. You may arrive at a different conclusion.**

In what state or country (if international) are the certified operations located (list)? **See attached.**

What crops do these certified operations produce (list)? **See attached.**

### **Iris Rendon**

Quality Specialist  
NSF International - Canada  
☎ (+1) 519-821-1246 ext. 5059  
✉ [irendon@nsf.org](mailto:irendon@nsf.org)  
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**From:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **On Behalf Of** AMS - AIAinbox

**Sent:** March-01-16 10:12 AM

**To:** AMS - AIAinbox

**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); Koble, Clinton - FSA, Reno, NV; [emel.erkar@bio-inspecta.com](mailto:emel.erkar@bio-inspecta.com); [central@biolatina.com](mailto:central@biolatina.com); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); [amalia.rueda@bioagricert.org](mailto:amalia.rueda@bioagricert.org); [admin@bio-inspecta.ch](mailto:admin@bio-inspecta.ch); [central@biolatina.com](mailto:central@biolatina.com); [Pat.Kennelly@cdph.ca.gov](mailto:Pat.Kennelly@cdph.ca.gov); [info@bioagricert.org](mailto:info@bioagricert.org); [julia.winter@bio-inspecta.ch](mailto:julia.winter@bio-inspecta.ch); [accreditation@ccof.org](mailto:accreditation@ccof.org); [Bolicert@megalink.com](mailto:Bolicert@megalink.com); [riccardo.cozzo@bioagricert.org](mailto:riccardo.cozzo@bioagricert.org); [calidad@certimexsc.com](mailto:calidad@certimexsc.com); [rporto@caae.es](mailto:rporto@caae.es); [Bolicert@bolicert.org](mailto:Bolicert@bolicert.org); [tom.nizet@certisys.eu](mailto:tom.nizet@certisys.eu); 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**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 17, 2016 4:15 PM  
**To:** Rendon, Iris  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Iris!

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**From:** Rendon, Iris [mailto:irendon@gftc.ca]  
**Sent:** Thursday, March 10, 2016 2:19 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**Importance:** High

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **Yes**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **Three, however, please see attachment with comments. You may arrive at a different conclusion.**

In what state or country (if international) are the certified operations located (list)? **See attached.**

What crops do these certified operations produce (list)? **See attached.**

### **Iris Rendon**

Quality Specialist  
NSF International - Canada  
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**From:** Baron , Anne - AMS [mailto:[AnneP.Baron@ams.usda.gov](mailto:AnneP.Baron@ams.usda.gov)] **On Behalf Of** AMS - AIAinbox  
**Sent:** March-01-16 10:12 AM  
**To:** AMS - AIAinbox  
**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au);

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This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 17, 2016 4:06 PM  
**To:** Dave Lockman  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Dave!

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**From:** Dave Lockman [mailto:dave.lockman@pro-cert.org]  
**Sent:** Wednesday, March 09, 2016 1:16 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget,

We do not currently certify hydroponic, aeroponic or aquaponics operations.

If you have any questions please do not hesitate to contact me.

Sincerely,

**Pro-Cert Organic Systems Ltd.**

Dave Lockman, MBA, P.Ag.

Certification Manager, Eastern Region

2311 Elm Tree Road, P.O. Box 74  
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E: [dave.lockman@pro-cert.org](mailto:dave.lockman@pro-cert.org)  
Web: [www.pro-cert.org](http://www.pro-cert.org)



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**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox  
**Sent:** March-01-16 10:12 AM  
**To:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>  
**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); Koble, Clinton - FSA, Reno, NV <[clinton.koble@nv.usda.gov](mailto:clinton.koble@nv.usda.gov)>; [emel.erkant@bio-inspecta.com](mailto:emel.erkant@bio-inspecta.com); [central@biolatina.com](mailto:central@biolatina.com); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); [amalia.rueda@bioagricert.org](mailto:amalia.rueda@bioagricert.org); [admin@bio-inspecta.ch](mailto:admin@bio-inspecta.ch); [central@biolatina.com](mailto:central@biolatina.com); [Pat.Kennelly@cdph.ca.gov](mailto:Pat.Kennelly@cdph.ca.gov); [info@bioagricert.org](mailto:info@bioagricert.org); [julia.winter@bio-inspecta.ch](mailto:julia.winter@bio-inspecta.ch); [accreditation@ccof.org](mailto:accreditation@ccof.org);



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**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:



The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 17, 2016 4:04 PM  
**To:** Nune Darbinjan  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Dr. Darbinyan!

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**From:** Nune Darbinjan [mailto:nuneemil@yahoo.com]  
**Sent:** Wednesday, March 09, 2016 1:44 AM  
**To:** AMS - AIAinbox ; Nune Darbinjan ; McElroy, Bridget - AMS  
**Subject:** Re: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear NOP,

I would like to inform you that ECOGLOBE (EGLO) does not certify any hydroponic, aquaponic, aeroponic.

We are especially interested in any instruction and new approaches to this technologies by the NOP.

*Best regards, Ms. Nune Darbinyan*

*Liebe Grüße, Frau Nune Darbinyan*

**Dr. Nune Darbinyan**  
**General Director**  
**ECOGLOBE**

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***Organic certification worldwide USA, Canada, EU, Switzerland***

***EU and Swiss code is BIO-112***

***Mind about environment before printing!***

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**Sent:** Tuesday, March 1, 2016 6:11 PM

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 17, 2016 3:52 PM  
**To:** Callyn Kircher  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Callyn!

---

**From:** Callyn Kircher [mailto:callyn@tilth.org]  
**Sent:** Tuesday, March 08, 2016 5:09 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** Re: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

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**Callyn Kircher** » *Farm Program Manager*

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 17, 2016 3:47 PM  
**To:** Daniel Szalai  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Daniel!

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**From:** Daniel Szalai [mailto:dszalai@controlunion.com]  
**Sent:** Tuesday, March 08, 2016 4:59 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Ms McElroy,

Please find CUC's answers below.

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? yes  
If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? 1  
In what state or country (if international) are the certified operations located (list)? The Netherlands  
What crops do these certified operations produce (list)? Peppers/Paprika

Kind regards,  
Daniel Szalai

---

**Dániel Szalai**

T +31-38-426 0100 • F : +31-38-423 7040



Control Union Certifications

OFFICE Meeuwenlaan 4-6, • Zwolle • The Netherlands

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**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox  
**Sent:** Tuesday, March 01, 2016 4:12 PM  
**To:** AMS - AIAinbox <AIAinbox@ams.usda.gov>  
**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); Koble, Clinton - FSA, Reno, NV <[clinton.koble@nv.usda.gov](mailto:clinton.koble@nv.usda.gov)>; [emel.erkon@bio-inspecta.com](mailto:emel.erkon@bio-inspecta.com); [central@biolatina.com](mailto:central@biolatina.com); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); [amalia.rueda@bioagricert.org](mailto:amalia.rueda@bioagricert.org); [admin@bio-inspecta.ch](mailto:admin@bio-inspecta.ch); [central@biolatina.com](mailto:central@biolatina.com);



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**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:



The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

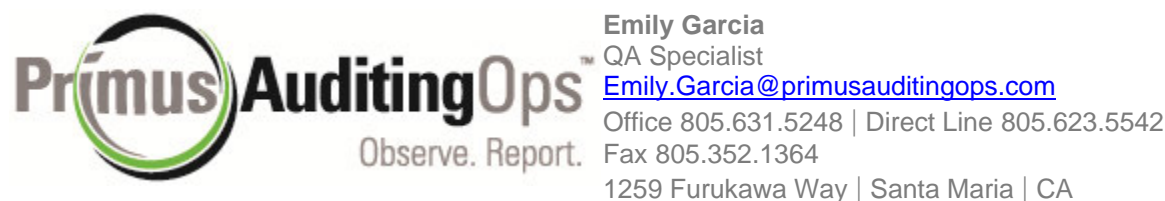
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**From:** Emily Garcia <Emily.Garcia@primusauditingops.com>  
**Sent:** Thursday, April 07, 2016 12:13 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** PrimusOrganic; AuditQA  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget,

All operations fall within category 2 (containers). Please let me know if you need more information.

Best,



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**From:** "McElroy, Bridget - AMS" <[Bridget.McElroy@ams.usda.gov](mailto:Bridget.McElroy@ams.usda.gov)>  
**Date:** Tuesday, April 5, 2016 at 10:28 AM  
**To:** Emily Garcia <[Emily.Garcia@primusauditingops.com](mailto:Emily.Garcia@primusauditingops.com)>  
**Cc:** PrimusOrganic <[PrimusOrganic@primuslabs.com](mailto:PrimusOrganic@primuslabs.com)>, AuditQA <[auditqa@primusauditingops.com](mailto:auditqa@primusauditingops.com)>  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Emily,

Thank you again for sharing your information regarding certification of hydroponic production. As we go through the results, we are realizing that it would be helpful to have slightly more detailed information from certifiers in an effort to differentiate between production that is more clearly hydroponic and production which falls more under "container" production. We know that the systems out there are quite diverse and the continuum from in ground, to container, to hydroponic production can make it challenging to know where to draw the line. For this survey, it would simply be helpful to know how many of the operations that you are certifying are:

1. Systems like NFT, raft, ebb and flow (hydroponic)
2. Systems like pots, upright bags, Dutch bucket ("container")
3. And systems that fall under #1 but use fish waste for fertility (aquaponics)

Among the 28 operations that you are certifying, would you consider them all to be hydroponic and aquaponic, or are some closer to container production?

Regards,

**Bridget McElroy**

Policy Analyst

USDA National Organic Program

1400 Independence Ave. SW  
Room 2646-S. (Stop 0268)  
Washington, D.C. 20205  
(202) 260-9288

**From:** Emily Garcia [<mailto:Emily.Garcia@primusauditingops.com>]

**Sent:** Friday, March 11, 2016 1:48 PM

**To:** McElroy, Bridget - AMS <[Bridget.McElroy@ams.usda.gov](mailto:Bridget.McElroy@ams.usda.gov)>

**Cc:** PrimusOrganic <[PrimusOrganic@primuslabs.com](mailto:PrimusOrganic@primuslabs.com)>; AuditQA <[auditqa@primusauditingops.com](mailto:auditqa@primusauditingops.com)>

**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems


Hello Bridget,

Please see Primus Labs responses in **Red**:

1. <!--[if !supportLists]--><!--[endif]-->Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **Yes, we certify hydroponic operations**
2. <!--[if !supportLists]--><!--[endif]-->If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **28**
3. <!--[if !supportLists]--><!--[endif]-->In what state or country (if international) are the certified operations located (list)?  
**California**  
**Mexico**
4. <!--[if !supportLists]--><!--[endif]-->What crops do these certified operations produce (list)?  
**Raspberries**  
**Blueberries**  
**Butter lettuce**

Let me know if you have any questions.

Best,

**Emily Garcia**  
QA Specialist  
[Emily.Garcia@primusauditingops.com](mailto:Emily.Garcia@primusauditingops.com)  
Office 805.631.5248 | Direct Line 805.623.5542  
Fax 805.352.1364  
1259 Furukawa Way | Santa Maria | CA



**From:** Baron, Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **On Behalf Of** AMS - AIAinbox

**Sent:** Tuesday, March 01, 2016 7:12 AM

**To:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>

**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); Koble, Clinton - FSA, Reno, NV <[clinton.koble@nv.usda.gov](mailto:clinton.koble@nv.usda.gov)>; [emel.erkon@bio-inspecta.com](mailto:emel.erkon@bio-inspecta.com); [central@biolatina.com](mailto:central@biolatina.com); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); [amalia.rueda@bioagricert.org](mailto:amalia.rueda@bioagricert.org); [admin@bio-inspecta.ch](mailto:admin@bio-inspecta.ch); [central@biolatina.com](mailto:central@biolatina.com); [Pat.Kennelly@cdph.ca.gov](mailto:Pat.Kennelly@cdph.ca.gov); [info@bioagricert.org](mailto:info@bioagricert.org); [julia.winter@bio-inspecta.ch](mailto:julia.winter@bio-inspecta.ch); [accreditation@ccof.org](mailto:accreditation@ccof.org); [Bolicert@megalink.com](mailto:Bolicert@megalink.com); [riccardo.cozzo@bioagricert.org](mailto:riccardo.cozzo@bioagricert.org); [calidad@certimexsc.com](mailto:calidad@certimexsc.com); [rporto@caae.es](mailto:rporto@caae.es); [Bolicert@bolicert.org](mailto:Bolicert@bolicert.org); [tom.nizet@certisys.eu](mailto:tom.nizet@certisys.eu); [ccof@ccof.org](mailto:ccof@ccof.org); [rporto@caae.es](mailto:rporto@caae.es); [saltmn@clemsun.edu](mailto:saltmn@clemsun.edu); [ccpb@ccpb.it](mailto:ccpb@ccpb.it); [Danny.Lee@cdfa.ca.gov](mailto:Danny.Lee@cdfa.ca.gov); [mitchell.yergert@state.co.us](mailto:mitchell.yergert@state.co.us); [certimex@certimexsc.com](mailto:certimex@certimexsc.com); Lewin Jake-FASConatct <[jake@ccof.org](mailto:jake@ccof.org)>; [jvdschootbrugge@controlunion.com](mailto:jvdschootbrugge@controlunion.com); [ceres@ceres-cert.com](mailto:ceres@ceres-cert.com); [rsetti@ccpb.it](mailto:rsetti@ccpb.it); [vincent.morel@ecocert.com](mailto:vincent.morel@ecocert.com); [info@certisys.eu](mailto:info@certisys.eu); [direccionejecutiva@certimexsc.com](mailto:direccionejecutiva@certimexsc.com); [agroecologiauna@gmail.com](mailto:agroecologiauna@gmail.com);

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(b) (6) @gmail.com; [rlarsen@utah.gov](mailto:rlarsen@utah.gov); [Nicole@nofavt.org](mailto:Nicole@nofavt.org); [bbook@agr.wa.gov](mailto:bbook@agr.wa.gov); [dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- <!--[if !supportLists]--><!--[endif]-->Deep flow/raft
- <!--[if !supportLists]--><!--[endif]-->Nutrient film technique (NFT)
- <!--[if !supportLists]--><!--[endif]-->Ebb and flow
- <!--[if !supportLists]--><!--[endif]-->Slab (lay-flat bags)
- <!--[if !supportLists]--><!--[endif]-->Upright bags or Dutch buckets
- <!--[if !supportLists]--><!--[endif]-->Troughs
- <!--[if !supportLists]--><!--[endif]-->Towers
- <!--[if !supportLists]--><!--[endif]-->Pots
- <!--[if !supportLists]--><!--[endif]-->Aeroponics
- <!--[if !supportLists]--><!--[endif]-->Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11:

[bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,

Cheri Courtney

Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Friday, April 01, 2016 10:48 AM  
**To:** Nicole Dehne  
**Subject:** RE: hydroponic, aquaponic, and aeroponic

Thank you Nicole!

**From:** Nicole Dehne [mailto:[nicole@nofavt.org](mailto:nicole@nofavt.org)]  
**Sent:** Tuesday, March 22, 2016 4:54 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** hydroponic, aquaponic, and aeroponic

Hi Bridget,

Vermont Organic Farmers does not certify any of these types of operations.

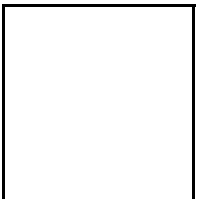
Best,

Nicole

--

Nicole Dehne  
Certification Administrator  
Vermont Organic Farmers LLC  
PO Box 697  
Richmond VT 05477  
802-434-3821

**Certified Organic, Locally Grown**



## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 17, 2016 3:53 PM  
**To:** Kyla Smith  
**Subject:** RE: hydroponics

Thank you, Kyla!

**From:** Kyla Smith [mailto:kyla@paorganic.org]  
**Sent:** Tuesday, March 08, 2016 11:32 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** hydroponics

Bridget-

Please see our answers to the questions in blue below.

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? [Yes, hydroponic only.](#)

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? [5](#)

In what state or country (if international) are the certified operations located (list)? [Pennsylvania](#)

What crops do these certified operations produce (list)? [tobacco seedlings, sprouts, chard, collards, lettuce, kale, microgreens](#)

Let me know if you have further questions.

Thanks-  
Kyla

--  
Kyla Smith  
Certification Director  
Pennsylvania Certified Organic  
106 School Street, Suite 201 Spring Mills, PA 16875  
Phone: 814-422-0251

[www.paorganic.org](http://www.paorganic.org)

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 03, 2016 4:27 PM  
**To:** Meriem Aroussi  
**Cc:** 'Juan Antonio Mendoza'  
**Subject:** RE: Mayacert - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Meriem.

### Bridget McElroy

Policy Analyst  
USDA National Organic Program  
1400 Independence Ave. SW  
Room 2646-S. (Stop 0268)  
Washington, D.C. 20205

(202) 260-9288

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**From:** Meriem Aroussi [mailto:meriem.aroussi@mayacert.com]  
**Sent:** Wednesday, March 02, 2016 1:46 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** 'Juan Antonio Mendoza'  
**Subject:** Mayacert - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget,

Mayacert doesn't certify any hydroponic, aeroponic or aquaponic operations to the USDA organic standards.

Don't hesitate to contact me if you need any further information.

Regards,



*Meriem Aroussi*  
*Quality Manager*

---

### MAYACERT S.A.

18 Calle 7-25 zona 11 Col. Mariscal, Guatemala.  
PBX: (+502)2463-3333 FAX: (+502)2463-3333 Ext: 107  
Cel: (b) (6) Skype: (b) (6)  
"Certificación de Excelencia a su Servicio"

## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 03, 2016 4:23 PM  
**To:** Cindy Elder  
**Subject:** RE: OCIA Intl FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Cindy.

---

**From:** Cindy Elder [mailto:CElder@ocia.org]  
**Sent:** Tuesday, March 01, 2016 11:18 AM  
**To:** McElroy, Bridget - AMS  
**Cc:** Cindy Elder  
**Subject:** OCIA Intl FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget,

OCIA International does not certify any hydroponic, aeroponic, or aquaponic operations.

Thank you,  
Cindy

### Cindy Elder

Director of Accreditation and Inspector Services/Board Liaison  
OCIA International, Inc.  
1340 N. Cotner Blvd  
Lincoln, NE 68505 USA  
Phone: (402) 477-2323 Ext. 327  
Fax: (402) 477-4325  
[www.ocia.org](http://www.ocia.org)

OCIA is committed to providing environmentally sound stewardship through research, education, professional development and organic certification for organic farmers and processors.

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**From:** Baron , Anne - AMS [mailto:[AnneP.Baron@ams.usda.gov](mailto:AnneP.Baron@ams.usda.gov)] **On Behalf Of** AMS - AIAinbox  
**Sent:** Tuesday, March 01, 2016 9:12 AM  
**To:** AMS - AIAinbox  
**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); Koble, Clinton - FSA, Reno,

NV; [emel.erkam@bio-inspecta.com](mailto:emel.erkam@bio-inspecta.com); [central@biolatina.com](mailto:central@biolatina.com); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); [amalia.rueda@bioagricert.org](mailto:amalia.rueda@bioagricert.org); [admin@bio-inspecta.ch](mailto:admin@bio-inspecta.ch); [central@biolatina.com](mailto:central@biolatina.com); [Pat.Kennelly@cdph.ca.gov](mailto:Pat.Kennelly@cdph.ca.gov); [info@bioagricert.org](mailto:info@bioagricert.org); [julia.winter@bio-inspecta.ch](mailto:julia.winter@bio-inspecta.ch); [accreditation@ccof.org](mailto:accreditation@ccof.org); [Bolicert@megalink.com](mailto:Bolicert@megalink.com); [riccardo.cozzo@bioagricert.org](mailto:riccardo.cozzo@bioagricert.org); [calidad@certimexsc.com](mailto:calidad@certimexsc.com); [rporto@caae.es](mailto:rporto@caae.es); [Bolicert@bolicert.org](mailto:Bolicert@bolicert.org); [tom.nizet@certisys.eu](mailto:tom.nizet@certisys.eu); [ccof@ccof.org](mailto:ccof@ccof.org); [rporto@caae.es](mailto:rporto@caae.es); 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[lacon@lacon-institut.org](mailto:lacon@lacon-institut.org); [adam.watson@ky.gov](mailto:adam.watson@ky.gov); [kirrilley.becker@nasaa.com.au](mailto:kirrilley.becker@nasaa.com.au); [letis@letis.org](mailto:letis@letis.org); [fischer@bcs-oeko.de](mailto:fischer@bcs-oeko.de); [cfanta@naturesinternational.com](mailto:cfanta@naturesinternational.com); [jstiles@marincounty.org](mailto:jstiles@marincounty.org); [j.kopp@lacon-institut.org](mailto:j.kopp@lacon-institut.org); [jabbott@agri.nv.gov](mailto:jabbott@agri.nv.gov); FGIS OA, Maryland; [internacional@letis.org](mailto:internacional@letis.org); [Victoria.Smith@agr.nh.gov](mailto:Victoria.Smith@agr.nh.gov); [info@mayacert.com](mailto:info@mayacert.com); [jstiles@marincounty.org](mailto:jstiles@marincounty.org); [Daniel.wunderlich@ag.state.nj.us](mailto:Daniel.wunderlich@ag.state.nj.us); [mosa@mosaorganic.org](mailto:mosa@mosaorganic.org); FGIS OA, Maryland; [SGerk@nmda.nmsu.edu](mailto:SGerk@nmda.nmsu.edu); [mncia@mncia.org](mailto:mncia@mncia.org); 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[sachin.ayachit@nasaa.com.au](mailto:sachin.ayachit@nasaa.com.au); [kyla@paorganic.org](mailto:kyla@paorganic.org); [Jennifer.Gornert@agr.nh.gov](mailto:Jennifer.Gornert@agr.nh.gov); [nfccertification@gmail.com](mailto:nfccertification@gmail.com); [brian.mansfield@primuslabs.com](mailto:brian.mansfield@primuslabs.com); [erich.bremer@ag.state.nj.us](mailto:erich.bremer@ag.state.nj.us); [dave@naturesinternational.com](mailto:dave@naturesinternational.com); [byron.hamm@pro-cert.org](mailto:byron.hamm@pro-cert.org); [organic@nmda.nmsu.edu](mailto:organic@nmda.nmsu.edu); [ajeppson@agri.nv.gov](mailto:ajeppson@agri.nv.gov); [thughes@nsf.org](mailto:thughes@nsf.org); [certifiedorganic@nofany.org](mailto:certifiedorganic@nofany.org); [Jennifer.Gornert@agr.nh.gov](mailto:Jennifer.Gornert@agr.nh.gov); [ram@qcsinfo.org](mailto:ram@qcsinfo.org); [organic@oeffa.org](mailto:organic@oeffa.org); [erich.bremer@ag.state.nj.us](mailto:erich.bremer@ag.state.nj.us); [dkirsanovaphillips@scscertified.com](mailto:dkirsanovaphillips@scscertified.com); 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Cindy Elder; [PrimusOrganic@primuslabs.com](mailto:PrimusOrganic@primuslabs.com); [xiao@ofdc.org.cn](mailto:xiao@ofdc.org.cn); [info@pro-cert.org](mailto:info@pro-cert.org); [pedroalanda@oia.com.ar](mailto:pedroalanda@oia.com.ar); [gai@gai-inc.com](mailto:gai@gai-inc.com); [ocd@omicnet.com](mailto:ocd@omicnet.com); [qcs@qcsinfo.org](mailto:qcs@qcsinfo.org); [leslie@paorganic.org](mailto:leslie@paorganic.org); [matt.green@dem.ri.gov](mailto:matt.green@dem.ri.gov); [deborah.mansfield@primuslabs.com](mailto:deborah.mansfield@primuslabs.com); [organic@scsglobalservice.com](mailto:organic@scsglobalservice.com); [Dave.Lockman@pro-cert.org](mailto:Dave.Lockman@pro-cert.org); [Sally@Demeter-USA.org](mailto:Sally@Demeter-USA.org); [irendon@nsf.org](mailto:irendon@nsf.org); [Organic@TexasAgriculture.gov](mailto:Organic@TexasAgriculture.gov); [robin@qcsinfo.org](mailto:robin@qcsinfo.org); [\(b\) \(6\)@gmail.com](mailto:(b) (6)@gmail.com); [matt.green@dem.ri.gov](mailto:matt.green@dem.ri.gov); [rlarsen@utah.gov](mailto:rlarsen@utah.gov); 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**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 03, 2016 4:25 PM  
**To:** Sarah Costin  
**Cc:** Ro Leigh Elgas  
**Subject:** RE: Questions regarding hydroponic certification

Thank you, Sarah.

### Bridget McElroy

Policy Analyst  
USDA National Organic Program  
1400 Independence Ave. SW  
Room 2646-S. (Stop 0268)  
Washington, D.C. 20205

(202) 260-9288

**From:** Sarah Costin [mailto:sarah.abeeorganic@gmail.com]  
**Sent:** Tuesday, March 01, 2016 2:37 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** Ro Leigh Elgas  
**Subject:** Questions regarding hydroponic certification

Good afternoon Bridget,

I'm answering your "Questions for Certifying Agents":

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

Yes

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

10 currently certified, 1 in process (7 hydroponic, 4 aquaponic, no aeroponic)

In what state or country (if international) are the certified operations located (list)?

Alaska: 1; California: 7; Colorado: 2; Virginia 1

What crops do these certified operations produce (list)?

Arugula, Baby lettuce, Basil, Bell peppers, Brassicas, Chard, Cucumbers, Greens, Green beans, Herbs, Kale, Lettuce-Head, Lettuce- Leaf, Mints, Mizuna, Onions, Snap peas, Sorrel, Spinach, Sprouts, Summer Squash, Tat soi, Tomatoes, Upland cress, Watercress, Wheatgrass

We look forward to hearing more on hydroponic/aquaponic/aeroponic systems as they fit into the USDA NOP.

Sarah  
Sarah Costin  
Co-Creator/Owner

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 17, 2016 4:43 PM  
**To:** Book, Brenda (AGR)  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hi Brenda,

Thank you very much for this information. From this and a couple of other responses, I'm realizing that one clarification should have been included in the message to certifiers. We aren't currently considering transplant/start production in the hydroponic/aquaponics count because ultimately these crops end up in the ground.

We are looking to include operations that use small amounts of growing media in hydroponic-based systems. For example, lettuce grown in a small plug of compost mix in an NFT system from seed to harvest.

From what I can gather, WSDA only certifies one operation that would really count (the ebb and flow for the full life cycle) and the rest are transplants. Does that sound right?

Best,

Bridget

---

**From:** Book, Brenda (AGR) [mailto:BBook@agr.wa.gov]  
**Sent:** Wednesday, March 16, 2016 7:55 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** Rice, Scott (AGR)  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget –

Thanks for the reminder. Our responses are below:

*Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?*

WSDA currently defines a hydroponic system as a system that is grown without media. We do not certify any operations that are grown without media.

However, if we apply the definition provided in the below email it would require that we include all of our operations that produce plant starts in greenhouses as a hydroponic operation. These growers start seeds in containers with small amounts of growing media and provide additional nutrients in the water provided to the plants. The majority of these growers will then sell these organic transplants to be planted outside in the ground. In very few instances, the grower continues to grow the plants until harvest in these containers, inside greenhouses or other facilities with artificial lighting. All of these growers could qualify as hydroponic systems based on the provided definition; none would be aeroponic or aquaponics systems.

*If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?*

We certify 80 operations that produce plant starts in a container production system. One of these maintains the plants in the container for its full life cycle and they are not considered plant starts; this operation uses an ebb and flow system.

*In what state or country (if international) are the certified operations located (list)?*

All are in Washington except the one that does not sell transplants, which is located in Georgia.

*What crops do these certified operations produce (list)?*

The plant starts are mixed vegetables and herbs. The crops of the operation in Georgia are listed as potted herbs and living herbs.

Brenda Book  
WSDA Organic Program Manager

Direct: 360-902-2090 / [bbook@agr.wa.gov](mailto:bbook@agr.wa.gov)  
Main: 360-902-1805 / [organic@agr.wa.gov](mailto:organic@agr.wa.gov)  
Web: <http://agr.wa.gov/FoodAnimal/Organic>

Interested in organic certification? Learn more: <http://agr.wa.gov/FoodAnimal/Organic/NewOrg.aspx>

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**From:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **On Behalf Of** AMS - AIAinbox  
**Sent:** Wednesday, March 16, 2016 12:30 PM  
**To:** AMS - AIAinbox  
**Subject:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

\*\*\*Original Message\*\*\*

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow



- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 17, 2016 4:45 PM  
**To:** Ashley P. Jeppson  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Ashley!

---

**From:** Ashley P. Jeppson [mailto:ajeppson@agri.nv.gov]  
**Sent:** Wednesday, March 16, 2016 8:04 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** FW: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget,

The Nevada Department of Agriculture does not certify organic any hydroponic, Aquaponic, or aeroponic operations.



### Ashley Jeppson

Agriculturist | Plant Industry Division | Nevada Department of Agriculture  
405 South 21st Street, Sparks, NV 89431

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**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox  
**Sent:** Wednesday, March 16, 2016 12:30 PM  
**To:** AMS - AIAinbox <AIAinbox@ams.usda.gov>  
**Subject:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

\*\*\*Original Message\*\*\*

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **No**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 17, 2016 4:54 PM  
**To:** Sonja Huigen, IMO  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Sonja!

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**From:** Sonja Huigen, IMO [mailto:Sonja.Huigen@imo.ch]  
**Sent:** Thursday, March 17, 2016 11:52 AM  
**To:** McElroy, Bridget - AMS  
**Cc:** Beatrice Breuer, IMO  
**Subject:** AW: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget,  
I am not aware that we currently certify one of the below mentioned production systems. If this would change in the future, I'll contact you to keep you updated.  
Kind regards,  
Sonja  
IMOsuisse AG

---

**Von:** Baron , Anne - AMS [AnneP.Baron@ams.usda.gov]" im Auftrag von "AMS - AIAinbox [AIAinbox@ams.usda.gov]  
**Gesendet:** Mittwoch, 16. März 2016 20:30  
**An:** AMS - AIAinbox  
**Betreff:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

\*\*\*Original Message\*\*\*

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media

for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Friday, March 18, 2016 10:28 AM  
**To:** Gerencia Calidad  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Muchas gracias, Roxana!

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**From:** Gerencia Calidad [mailto:roxana.priego@biolatina.com.pe]  
**Sent:** Thursday, March 17, 2016 8:04 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** central@biolatina.com; 'Asistente de Gerencia'  
**Subject:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget:  
BIO LATINA does not certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards.

Saludos, Best regards  
Roxana Priego  
Bio Latina S.A.C.  
Jr. Domingo Millan 852,  
Jesus María, Lima 11  
Lima, Peru  
Tel: ++51 1 2031130  
[www.biolatina.com](http://www.biolatina.com)  
[roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe)  
skype: roxana.priego

## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Monday, March 21, 2016 5:48 PM  
**To:** NOP ICEA  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Cristina!

---

**From:** NOP ICEA [mailto:nop@icea.info]  
**Sent:** Friday, March 18, 2016 4:00 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** I: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Mrs. Bridget,

ICEA has not any company certified for hydroponic, aquaponic and aeroponic system.

Best regards,  
Cristina Baia  
Export Office ICEA  
[nop@icea.info](mailto:nop@icea.info)  
[www.icea.info](http://www.icea.info)

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**Da:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **Per conto di** AMS - AIAinbox  
**Inviato:** mercoledì 16 marzo 2016 20:30  
**A:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>  
**Oggetto:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

\*\*\*Original Message\*\*\*

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

[What do we mean by hydroponic, aquaponic, aeroponic?](#)

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

---

**From:** McElroy, Bridget - AMS  
**Sent:** Monday, March 21, 2016 5:49 PM  
**To:** ma@etko.org  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Mustafa!

---

**From:** ma@etko.org [mailto:ma@etko.org]  
**Sent:** Friday, March 18, 2016 1:44 PM  
**To:** AMS - AIAinbox  
**Cc:** McElroy, Bridget - AMS  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Anne, Bridget

ETKO does not certify production of mentioned systems for NOP.

Hope this information is helpfull

Have a nice weekend.

Mustafa Akyuz

ETKO Turkey

T: +90-232-3397606

F: +90-232-3397607

[www.etko.org](http://www.etko.org)

---

**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox  
**Sent:** Wednesday, March 16, 2016 9:30 PM  
**To:** AMS - AIAinbox  
**Subject:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

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**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

---

**From:** McElroy, Bridget - AMS  
**Sent:** Monday, March 21, 2016 5:50 PM  
**To:** Maria Susana Gerlero  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Maria Susana!

---

**From:** Maria Susana Gerlero [mailto:calidad@foodsafety.com.ar]  
**Sent:** Monday, March 21, 2016 7:30 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Ms Bridget

According your request (received trough Ms. Anne Baron)we do not certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards

Best regards



---

**De:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **En nombre de** AMS - AIAinbox  
**Enviado el:** miércoles, 16 de marzo de 2016 04:30 p.m.  
**Para:** AMS - AIAinbox  
**Asunto:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

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Regards,  
Cheri Courtney

Director, Accreditation and International Activities Division

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What do we mean by hydroponic, aquaponic, aeroponic?

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- Aeroponics
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**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

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Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

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**From:** Maria Susana Gerlero <calidad@foodsafety.com.ar>  
**Sent:** Monday, March 21, 2016 7:30 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Ms Bridget

According your request (received trough Ms. Anne Baron)we do not certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards

Best regards



---

**De:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **En nombre de** AMS - AIAinbox  
**Enviado el:** miércoles, 16 de marzo de 2016 04:30 p.m.  
**Para:** AMS - AIAinbox  
**Asunto:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

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Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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### **Questions for Certifying Agents:**

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If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

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## Schurkamp, Lynnea - AMS

---

**From:** McElroy, Bridget - AMS  
**Sent:** Monday, March 21, 2016 5:50 PM  
**To:** OIA - Gestion de Calidad  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Ornella!

---

**From:** OIA - Gestion de Calidad [mailto:gestiondecalidad@oia.com.ar]  
**Sent:** Monday, March 21, 2016 4:22 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** RV: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget McElroy,

OIA do not certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards

Sincerely,



**Ornella Conforti**  
**Gestión de la Calidad - Organización Internacional Agropecuaria**  
[gestiondecalidad@oia.com.ar](mailto:gestiondecalidad@oia.com.ar) | [www.oia.com.ar](http://www.oia.com.ar)  
Tel: (54 11) 4793-4340 / 4798-9084  
Av. Santa Fe 830 | Acassuso | Bs. As. | Argentina

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---

**De:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **En nombre de** AMS - AIAinbox  
**Enviado el:** miércoles, 16 de marzo de 2016 04:30 p.m.  
**Para:** AMS - AIAinbox  
**Asunto:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

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Regards,  
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#### Questions for Certifying Agents:

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## Schurkamp, Lynnea - AMS

---

**From:** ma@etko.org  
**Sent:** Friday, March 18, 2016 1:44 PM  
**To:** AMS - AIAinbox  
**Cc:** McElroy, Bridget - AMS  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Anne, Bridget

ETKO does not certify production of mentioned systems for NOP.

Hope this information is helpfull

Have a nice weekend.

Mustafa Akyuz

ETKO Turkey

T: +90-232-3397606

F: +90-232-3397607

[www.etko.org](http://www.etko.org)

---

**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox  
**Sent:** Wednesday, March 16, 2016 9:30 PM  
**To:** AMS - AIAinbox  
**Subject:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

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Director, Accreditation and International Activities Division

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**Questions for Certifying Agents:**

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## Schurkamp, Lynnea - AMS

---

**From:** Book, Brenda (AGR) <BBook@agr.wa.gov>  
**Sent:** Friday, March 18, 2016 11:52 AM  
**To:** McElroy, Bridget - AMS  
**Cc:** O'Brien, Colleen (AGR)  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget,

Yes, only the one operation would fit the definition after this clarification.

Brenda Book  
WSDA Organic Program Manager

Direct: 360-902-2090 / [bbook@agr.wa.gov](mailto:bbook@agr.wa.gov)  
Main: 360-902-1805 / [organic@agr.wa.gov](mailto:organic@agr.wa.gov)  
Web: <http://agr.wa.gov/FoodAnimal/Organic>

Interested in organic certification? Learn more: <http://agr.wa.gov/FoodAnimal/Organic/NewOrg.aspx>

---

**From:** McElroy, Bridget - AMS [<mailto:Bridget.McElroy@ams.usda.gov>]  
**Sent:** Thursday, March 17, 2016 1:43 PM  
**To:** Book, Brenda (AGR)  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hi Brenda,

Thank you very much for this information. From this and a couple of other responses, I'm realizing that one clarification should have been included in the message to certifiers. We aren't currently considering transplant/start production in the hydroponic/aquaponics count because ultimately these crops end up in the ground.

We are looking to include operations that use small amounts of growing media in hydroponic-based systems. For example, lettuce grown in a small plug of compost mix in an NFT system from seed to harvest.

From what I can gather, WSDA only certifies one operation that would really count (the ebb and flow for the full life cycle) and the rest are transplants. Does that sound right?

Best,

Bridget

---

**From:** Book, Brenda (AGR) [<mailto:BBook@agr.wa.gov>]  
**Sent:** Wednesday, March 16, 2016 7:55 PM  
**To:** McElroy, Bridget - AMS <[Bridget.McElroy@ams.usda.gov](mailto:Bridget.McElroy@ams.usda.gov)>

**Cc:** Rice, Scott (AGR) <[SRice@agr.wa.gov](mailto:SRice@agr.wa.gov)>

**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget –

Thanks for the reminder. Our responses are below:

*Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?*

WSDA currently defines a hydroponic system as a system that is grown without media. We do not certify any operations that are grown without media.

However, if we apply the definition provided in the below email it would require that we include all of our operations that produce plant starts in greenhouses as a hydroponic operation. These growers start seeds in containers with small amounts of growing media and provide additional nutrients in the water provided to the plants. The majority of these growers will then sell these organic transplants to be planted outside in the ground. In very few instances, the grower continues to grow the plants until harvest in these containers, inside greenhouses or other facilities with artificial lighting. All of these growers could qualify as hydroponic systems based on the provided definition; none would be aeroponic or aquaponics systems.

*If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?*

We certify 80 operations that produce plant starts in a container production system. One of these maintains the plants in the container for its full life cycle and they are not considered plant starts; this operation uses an ebb and flow system.

*In what state or country (if international) are the certified operations located (list)?*

All are in Washington except the one that does not sell transplants, which is located in Georgia.

*What crops do these certified operations produce (list)?*

The plant starts are mixed vegetables and herbs. The crops of the operation in Georgia are listed as potted herbs and living herbs.

Brenda Book  
WSDA Organic Program Manager

Direct: 360-902-2090 / [bbook@agr.wa.gov](mailto:bbook@agr.wa.gov)

Main: 360-902-1805 / [organic@agr.wa.gov](mailto:organic@agr.wa.gov)

Web: <http://agr.wa.gov/FoodAnimal/Organic>

Interested in organic certification? Learn more: <http://agr.wa.gov/FoodAnimal/Organic/NewOrg.aspx>

---

**From:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **On Behalf Of** AMS - AIAinbox

**Sent:** Wednesday, March 16, 2016 12:30 PM

**To:** AMS - AIAinbox

**Subject:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

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## Schurkamp, Lynnea - AMS

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**Sent:** Wednesday, March 16, 2016 7:55 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** Rice, Scott (AGR)  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget –

Thanks for the reminder. Our responses are below:

*Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?*

WSDA currently defines a hydroponic system as a system that is grown without media. We do not certify any operations that are grown without media.

However, if we apply the definition provided in the below email it would require that we include all of our operations that produce plant starts in greenhouses as a hydroponic operation. These growers start seeds in containers with small amounts of growing media and provide additional nutrients in the water provided to the plants. The majority of these growers will then sell these organic transplants to be planted outside in the ground. In very few instances, the grower continues to grow the plants until harvest in these containers, inside greenhouses or other facilities with artificial lighting. All of these growers could qualify as hydroponic systems based on the provided definition; none would be aeroponic or aquaponics systems.

*If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?*

We certify 80 operations that produce plant starts in a container production system. One of these maintains the plants in the container for its full life cycle and they are not considered plant starts; this operation uses an ebb and flow system.

*In what state or country (if international) are the certified operations located (list)?*

All are in Washington except the one that does not sell transplants, which is located in Georgia.

*What crops do these certified operations produce (list)?*

The plant starts are mixed vegetables and herbs. The crops of the operation in Georgia are listed as potted herbs and living herbs.

Brenda Book  
WSDA Organic Program Manager

Direct: 360-902-2090 / [bbook@agr.wa.gov](mailto:bbook@agr.wa.gov)  
Main: 360-902-1805 / [organic@agr.wa.gov](mailto:organic@agr.wa.gov)  
Web: <http://agr.wa.gov/FoodAnimal/Organic>

Interested in organic certification? Learn more: <http://agr.wa.gov/FoodAnimal/Organic/NewOrg.aspx>

---

**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox  
**Sent:** Wednesday, March 16, 2016 12:30 PM

**To:** AMS - AIAinbox

**Subject:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

\*\*\*Original Message\*\*\*

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

#### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

#### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.



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## Schurkamp, Lynnea - AMS

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**From:** ARGENCERT - Ing. Arg. Marina Figueiras <mfigueiras@argencert.com.ar>  
**Sent:** Wednesday, March 16, 2016 5:23 PM  
**To:** McElroy, Bridget - AMS; Laura Montenegro  
**Subject:** Re: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget,

ARGENCERT does not certify hydroponic, aeroponic or aquaponic operations at the moment.

Best regards,

Ing. Agr. Marina Figueiras  
Gerente de Calidad/Quality Manager  
ARGENCERT S.A.  
+54 11 4363 0033  
[mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar)  
[www.argencert.com.ar](http://www.argencert.com.ar)

El 16/03/2016 a las 04:30 p.m., AMS - AIAinbox escribió:

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

\*\*\*Original Message\*\*\*

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What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

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- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

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**From:** Laura Lopez <lauralopez@letis.org>  
**Sent:** Monday, March 28, 2016 2:58 PM  
**To:** AMS - AIAinbox  
**Cc:** McElroy, Bridget - AMS; Ing. Agr. Mónica De Nicola  
**Subject:** Re: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Cheri

We do not certify hidroponic, aquaponic, aeroponic and associated production systems.  
If you have any concern do not hesitate in contacting us  
Best regards

2016-03-24 13:16 GMT-03:00 Ing. Agr. Mónica De Nicola <[calidad@letis.org](mailto:calidad@letis.org)>:

Laura, porfa contestale que no certificamos hidroponia. e imprimilo y guardalo en carpeta NOP

Mónica De Nicola / Juliana Gilardoni  
Dirección de Calidad / Asistente de Calidad  
Quality Director / Quality Assistant  
**NUEVA DIRECCIÓN: San Lorenzo 2261 1° "A" Rosario - Santa Fe - Argentina**  
LETIS S.A.  
E-mail: [calidad@letis.org](mailto:calidad@letis.org)  
[www.letis.org](http://www.letis.org)

----- Forwarded message -----

**From:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>  
**Date:** 2016-03-16 16:30 GMT-03:00  
**Subject:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**To:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,

Cheri Courtney

\*\*\*Original Message\*\*\*

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

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- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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*Ing. Laura Lopez*  
*Dpto Técnico*  
*BPM-HACCP*  
[lauralopez@letis.org](mailto:lauralopez@letis.org)  
[www.letis.org](http://www.letis.org)  
0341-155117106

## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Monday, May 23, 2016 11:59 AM  
**To:** 'Amy Lamendella'  
**Subject:** RE: Request for information about hydroponic (etc) production

Hi Amy,

Just reading Sam's comments on your draft and looking back at the results of the survey we did to certifiers. I realize now that the language in the survey did not differentiate between seedling production and crops grown to harvest. However most certifiers specified this in their responses to me. On the container question I think we can be pretty sure that a majority of the 69 container based operations reported are for crops for harvest. That is assuming the 39 that you report below are not seedling operations. Other certifiers that reported certifying container based operations listed things like blueberries, raspberries, tomatoes and peppers in Mexico, lettuce—all things that seem more like crops for harvest, rather than seedlings.

Are any of the 39 operations below doing just seedlings? Do you have this information?

Thank you so much for your work on the container production draft!! It looks great so far. Will finish reading now.

Bridget

---

**From:** Amy Lamendella [mailto:amy@ccof.org]  
**Sent:** Wednesday, March 02, 2016 2:47 PM  
**To:** McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
**Subject:** Request for information about hydroponic (etc) production

Good afternoon Bridget,

We received your request, and I have CCOF results for you.

Please note that this is our best guess, that the systems we use to track these types of operations are not full proof. However it will give you a good indication.

Additionally, we do not track the different systems to the level of detail that the NOP requested, so I've separated the systems into Hydroponic, Aquaponic and container.

As you will see, we have very few hydroponic and aquaponics. Container systems (depending on how you define this) are far and away the most common type of certification within this spectrum.

As of March 1, 2016, CCOF has the following members:

**A. Hydroponic – 4 total (3 certified and 1 in process)**

3 in CA and 1 in NM

Types of systems: Raft, sand/gravel bed and NFT systems

CROPS- Lettuce, herbs

**B. Aquaponic - 3 total**

CA, TX and OK

Types of systems: Raft and media based

CROPS- Water plants, vegetables, herbs and microgreens, lettuce

**C. Container - 39 total**

13 in MX, 26 in USA

For US operations:

AZ = 1

CA = 18

CO = 5

MI = 1

NM = 1

Types of systems: Dutch bucket/Upright bag, slab, pots (most common)

CROPS\* = Berries (15), cucumber (3), herbs(1), lettuce (1) other mixed vegetables(3), peppers (2) tomatoes (15)

\*Note some operations grow multiple different crops

**Amy Lamendella**

Director of Farm Programs Certification

CCOF

2155 Delaware Ave, Suite 150

Santa Cruz, CA 95060

Phone 831-423-2263 ext 6215

(831) 346-6215

Fax 831-423-4528

[www.ccof.org](http://www.ccof.org)

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*Apoye la Ley de Alimentos y Agricultura Orgánica de California! Contacte su legislador para expresar su apoyo en pasar la Ley de Alimentos y Agricultura Orgánica de California para los agricultores orgánicos de California. [Lea más sobre la legislación y como puede participar »](#)*



## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 03, 2016 4:28 PM  
**To:** 'Amy Lamendella'  
**Subject:** RE: Request for information about hydroponic (etc) production

Thanks, Amy! I'll get these numbers to the task force as soon as I get all the responses in.

### Bridget McElroy

Policy Analyst  
USDA National Organic Program  
1400 Independence Ave. SW  
Room 2646-S. (Stop 0268)  
Washington, D.C. 20205

(202) 260-9288

---

**From:** Amy Lamendella [mailto:amy@ccof.org]  
**Sent:** Wednesday, March 02, 2016 2:47 PM  
**To:** McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
**Subject:** Request for information about hydroponic (etc) production

Good afternoon Bridget,  
We received your request, and I have CCOF results for you.  
Please note that this is our best guess, that the systems we use to track these types of operations are not full proof. However it will give you a good indication.

Additionally, we do not track the different systems to the level of detail that the NOP requested, so I've separated the systems into Hydroponic, Aquaponic and container.

As you will see, we have very few hydroponic and aquaponics. Container systems (depending on how you define this) are far and away the most common type of certification within this spectrum.

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- A. Hydroponic – 4 total (3 certified and 1 in process)**  
3 in CA and 1 in NM  
Types of systems: Raft, sand/gravel bed and NFT systems  
CROPS- Lettuce, herbs
  
- B. Aquaponic - 3 total**  
CA, TX and OK  
Types of systems: Raft and media based  
CROPS- Water plants, vegetables, herbs and microgreens, lettuce
  
- C. Container - 39 total**  
13 in MX, 26 in USA  
For US operations:

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## Amy Lamendella

Director of Farm Programs Certification

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## Schurkamp, Lynnea - AMS

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**From:** Amy Lamendella <amy@ccof.org>  
**Sent:** Monday, May 23, 2016 2:40 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** Re: Request for information about hydroponic (etc) production

Hi Bridget,

Yes, I am confident that the 39 operations reported do not include seedlings, as we haven't tracked greenhouse or transplant production in the same way as container crop production.

I haven been able to read Sams comments but look forward to doing so. I realize that my report was going to need reworking.

Also wanted to let you know that I will be on the calls today, but an home with the flu and my home computer died so o don't have access to the reports.

I'm going to do my best to participate today under non -ideal circumstances.

Amy

Sent from my iPhone

On May 23, 2016, at 8:58 AM, McElroy, Bridget - AMS <[Bridget.McElroy@ams.usda.gov](mailto:Bridget.McElroy@ams.usda.gov)> wrote:

Hi Amy,

Just reading Sam's comments on your draft and looking back at the results of the survey we did to certifiers. I realize now that the language in the survey did not differentiate between seedling production and crops grown to harvest. However most certifiers specified this in their responses to me. On the container question I think we can be pretty sure that a majority of the 69 container based operations reported are for crops for harvest. That is assuming the 39 that you report below are not seedling operations. Other certifiers that reported certifying container based operations listed things like blueberries, raspberries, tomatoes and peppers in Mexico, lettuce—all things that seem more like crops for harvest, rather than seedlings.

Are any of the 39 operations below doing just seedlings? Do you have this information?

Thank you so much for your work on the container production draft!! It looks great so far. Will finish reading now.

Bridget

---

**From:** Amy Lamendella [<mailto:amy@ccof.org>]  
**Sent:** Wednesday, March 02, 2016 2:47 PM  
**To:** McElroy, Bridget - AMS <[Bridget.McElroy@ams.usda.gov](mailto:Bridget.McElroy@ams.usda.gov)>  
**Subject:** Request for information about hydroponic (etc) production

Good afternoon Bridget,

We received your request, and I have CCOF results for you.

Please note that this is our best guess, that the systems we use to track these types of operations are not full proof. However it will give you a good indication.

Additionally, we do not track the different systems to the level of detail that the NOP requested, so I've separated the systems into Hydroponic, Aquaponic and container.

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**A. Hydroponic – 4 total (3 certified and 1 in process)**

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\*Note some operations grow multiple different crops

## Amy Lamendella

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 17, 2016 4:29 PM  
**To:** Dave Engel  
**Subject:** RE: Subject: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Dave!

---

**From:** Dave Engel [mailto:dave@naturesinternational.com]  
**Sent:** Sunday, March 13, 2016 10:22 AM  
**To:** McElroy, Bridget - AMS  
**Cc:** Chris Fanta ; Courtney, Cheri - AMS ; Baron , Anne - AMS  
**Subject:** Subject: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Bridget,

A somewhat belated response, but better a bit late than never, in this situation....I sense. These are viable, organic production systems. We should not have our heads in the ground (only!) like ostriches, re: accepting them for organic certification. I hope the nop and the task force can bring some balance and way forward to this discussion. Good luck.

Thank you.

Dave

David J. Engel, ED  
Nature's International Certification Services LLC  
608-632-1226

*"In Nature there is abundance, with Nature there is success"*

### **Questions for Certifying Agents:**

*Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?*

Yes.

*If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?*

One. In the past we also have had a few at any given time. And there are always periodic inquiries/interest.

*In what state or country (if international) are the certified operations located (list)?*

Three in wisconsin, two in texas, to date.

*What crops do these certified operations produce (list)?*

Variety of vegetables and herbs.

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
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- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

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In what state or country (if international) are the certified operations located (list)?

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Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11:[bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

## Schurkamp, Lynnea - AMS

---

**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 17, 2016 4:19 PM  
**To:** Mary Yurlina  
**Subject:** RE: Subject: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you for the clarification, Mary. I will make a note of this. Going through a ton of emails in the order that I received them, so I didn't see the second email until now.

Bridget

**From:** Mary Yurlina [mailto:yurlina@mofga.org]  
**Sent:** Thursday, March 10, 2016 4:10 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** Kate Newkirk ; Eric Sideman  
**Subject:** Re: Subject: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hi again Bridget,

My apologies for not stating this in the message I sent earlier, but we did want to point out that we do not certify hydroponic systems.

We felt able to consider aquaponic farms under the organic standard if it could be demonstrated that an ecological system was in place that included nutrient cycling.

Sincerely,

Mary

---

Mary Yurlina, Ph.D.  
Director, MOFGA Certification Services LLC  
Unity, Maine USA  
p. 207-568-6031 f. 866-344-0991  
[www.mofgacertification.org](http://www.mofgacertification.org)

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On Tue, Mar 8, 2016 at 7:29 PM, Mary Yurlina <[yurlina@mofga.org](mailto:yurlina@mofga.org)> wrote:

Hi Bridget:

We certify one aquaponics operation.

**Jackson McLeod & Tyler Gaudet**  
**Fluid Farms LLC**  
**972 River Rd**  
**Dresden, ME 04103**



Mailing address:

(b) (6)

**Crops:**

lettuce, basil, Micro-greens, Tatsoi

Best regards,  
Mary

---

Mary Yurlina  
Director, MOFGA Certification Services LLC  
Unity, Maine USA  
p. [207-568-6031](tel:207-568-6031) f. [866-344-0991](tel:866-344-0991)  
[www.mofgacertification.org](http://www.mofgacertification.org)

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This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
  
- Nutrient film technique (NFT)
  
- Ebb and flow
  
- Slab (lay-flat bags)
  
- Upright bags or Dutch buckets
  
- Troughs
  
- Towers

- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) <[http://bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov)> . You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney

Director, Accreditation and International Activities Division

## Schurkamp, Lynnea - AMS

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**From:** Mary Yurlina <yurlina@mofga.org>  
**Sent:** Thursday, March 10, 2016 4:10 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** Kate Newkirk; Eric Sideman  
**Subject:** Re: Subject: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hi again Bridget,

My apologies for not stating this in the message I sent earlier, but we did want to point out that we do not certify hydroponic systems.

We felt able to consider aquaponic farms under the organic standard if it could be demonstrated that an ecological system was in place that included nutrient cycling.

Sincerely,

Mary

---

Mary Yurlina, Ph.D.  
Director, MOFGA Certification Services LLC  
Unity, Maine USA  
p. 207-568-6031 f. 866-344-0991  
[www.mofgacertification.org](http://www.mofgacertification.org)

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On Tue, Mar 8, 2016 at 7:29 PM, Mary Yurlina <[yurlina@mofga.org](mailto:yurlina@mofga.org)> wrote:

Hi Bridget:

We certify one aquaponics operation.

**Jackson McLeod & Tyler Gaudet**  
**Fluid Farms LLC**  
**972 River Rd**  
**Dresden, ME 04103**

Mailing address:

(b) (6)

**Crops:**  
lettuce, basil, Micro-greens, Tatsoi

Best regards,  
Mary

---

Mary Yurlina  
Director, MOFGA Certification Services LLC  
Unity, Maine USA  
p. [207-568-6031](tel:207-568-6031) f. [866-344-0991](tel:866-344-0991)  
[www.mofgacertification.org](http://www.mofgacertification.org)

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What do we mean by hydroponic, aquaponic, aeroponic?

-  
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- Towers
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- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

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In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) <[http://bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov)> . You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney

Director, Accreditation and International Activities Division

## Schurkamp, Lynnea - AMS

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**From:** AmeriCert International <americert@gmail.com>  
**Sent:** Wednesday, March 16, 2016 8:29 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** Re Hydroponic etc.

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? Yes.

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? One (soilless media grower--hydroponic)

In what state or country (if international) are the certified operations located (list)? Florida.

What crops do these certified operations produce (list)? Basil.

Sincerely,  
Jonathan

--

Americert International  
(formerly known as OIA North America)  
2603 NW 13th St. #228  
Gainesville, FL 32609  
Ph: 352.336.5700  
Fax: 866.325.8261  
[www.americertorganic.com](http://www.americertorganic.com)

## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 03, 2016 4:27 PM  
**To:** Jeff Stearns  
**Subject:** RE:

Thank you, Jeff.

### Bridget McElroy

Policy Analyst  
USDA National Organic Program  
1400 Independence Ave. SW  
Room 2646-S. (Stop 0268)  
Washington, D.C. 20205

(202) 260-9288

---

**From:** Jeff Stearns [mailto:Jeff.Stearns@ag.ok.gov]  
**Sent:** Wednesday, March 02, 2016 8:41 AM  
**To:** McElroy, Bridget - AMS  
**Subject:**

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

No.

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

N/A

In what state or country (if international) are the certified operations located (list)?

N/A

What crops do these certified operations produce (list)?

N/A

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

Please let me know if you have anymore questions. Jeff Stearns





## Schurkamp, Lynnea - AMS

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**From:** Gerencia Calidad <roxana.priego@biolatina.com.pe>  
**Sent:** Thursday, March 17, 2016 8:04 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** central@biolatina.com; 'Asistente de Gerencia'  
**Subject:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget:

BIO LATINA does not certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards.

Saludos, Best regards

**Roxana Priego**

**Bio Latina S.A.C.**

**Jr. Domingo Millan 852,**

**Jesus María, Lima 11**

**Lima, Peru**

**Tel: ++51 1 2031130**

**[www.biolatina.com](http://www.biolatina.com)**

**[roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe)**

**skype: roxana.priego**

## Schurkamp, Lynnea - AMS

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**From:** Amy Lamendella <amy@ccof.org>  
**Sent:** Wednesday, March 02, 2016 2:47 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** Request for information about hydroponic (etc) production

Good afternoon Bridget,

We received your request, and I have CCOF results for you.

Please note that this is our best guess, that the systems we use to track these types of operations are not full proof. However it will give you a good indication.

Additionally, we do not track the different systems to the level of detail that the NOP requested, so I've separated the systems into Hydroponic, Aquaponic and container.

As you will see, we have very few hydroponic and aquaponics. Container systems (depending on how you define this) are far and away the most common type of certification within this spectrum.

As of March 1, 2016, CCOF has the following members:

**A. Hydroponic – 4 total (3 certified and 1 in process)**

3 in CA and 1 in NM

Types of systems: Raft, sand/gravel bed and NFT systems

CROPS- Lettuce, herbs

**B. Aquaponic - 3 total**

CA, TX and OK

Types of systems: Raft and media based

CROPS- Water plants, vegetables, herbs and microgreens, lettuce

**C. Container - 39 total**

13 in MX, 26 in USA

For US operations:

AZ = 1

CA = 18

CO = 5

MI = 1

NM = 1

Types of systems: Dutch bucket/Upright bag, slab, pots (most common)

CROPS\* = Berries (15), cucumber (3), herbs(1), lettuce (1) other mixed vegetables(3), peppers (2) tomatoes (15)

\*Note some operations grow multiple different crops

**Amy Lamendella**

Director of Farm Programs Certification

CCOF

2155 Delaware Ave, Suite 150

Santa Cruz, CA 95060

Phone 831-423-2263 ext 6215

(831) 346-6215

Fax 831-423-4528

[www.ccof.org](http://www.ccof.org)

*Support the California Organic Food and Farming Act! Contact your legislator to voice support for California's organic farmers by passing the California Organic Food and Farming Act. [Read more about the legislation and how you can get involved »](#)*

*Apoye la Ley de Alimentos y Agricultura Orgánica de California! Contacte su legislador para expresar su apoyo en pasar la Ley de Alimentos y Agricultura Orgánica de California para los agricultores orgánicos de California. [Lea más sobre la legislación y como puede participar »](#)*

## Schurkamp, Lynnea - AMS

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**From:** Eugenia Fraga <mefraga@foodsafety.com.ar>  
**Sent:** Tuesday, March 01, 2016 11:19 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** RV: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget,  
In Food Safety we do not certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards.

Please let me know if you need something else.

Regards,



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**De:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **En nombre de** AMS - AIAinbox

**Enviado el:** martes, 01 de marzo de 2016 12:12 p.m.

**Para:** AMS - AIAinbox

**CC:** admin@abeeorganic.com; sarah@abeeorganic.com; ro@abeeorganic.com; info@ascorganic.com; Kat@ascorganic.com; mfigueiras@argencert.com.ar; americert@gmail.com; americert@gmail.com; organic@ausmeat.com.au; info@argencert.com.ar; lmontenegro@argencert.com.ar; jorge.larranaga@aco.net.au; organic@ausqual.com.au; elise@ausqual.com.au; dcox@baystateorganic.org; michael.baker@aco.net.au; michael.baker@aco.net.au; roxana.priego@biolatina.com.pe; baystateorganic@earthlink.net; Koble, Clinton - FSA, Reno, NV; emel.erkar@bio-inspecta.com; central@biolatina.com; baystateorganic@earthlink.net; amalia.rueda@bioagricert.org; admin@bio-inspecta.ch; central@biolatina.com; Pat.Kennelly@cdph.ca.gov; info@bioagricert.org; julia.winter@bio-inspecta.ch; accreditation@ccof.org; Bolicert@megalink.com; riccardo.cozzo@bioagricert.org; calidad@certimexsc.com; rporto@caae.es; Bolicert@bolicert.org; tom.nizet@certisys.eu; ccof@ccof.org; rporto@caae.es; saltmn@clermson.edu; ccpb@ccpb.it; Danny.Lee@cdfa.ca.gov; mitchell.yergert@state.co.us; certimex@certimexsc.com; Lewin Jake-FASConatct; jvdschootbrugge@controlunion.com; ceres@ceres-cert.com; rsetti@ccpb.it; vincent.morel@ecocert.com; info@certisys.eu; direccionejecutiva@certimexsc.com; agroecologiauna@gmail.com; organic@clermson.edu; benzing@ceres-cert.com; mefraga@foodsafety.com.ar; amy.stafford@state.co.us; Nathalie.Boes@certisys.eu; joy.mccracken@georgiacrop.com; organic@controlunion.com; organic@clermson.edu; cvanhook77@earthlink.net; info.ecocertico@ecocert.com; amy.stafford@state.co.us; goabecky@centurylink.net; aude.bonnet@ecocert.com; dszalai@controlunion.com; camila@ibd.com.br; ep@ecoglobe.am; Jeffry.EVARD@ecocert.com; Jason.Laney@agri.idaho.gov; pdescamps@eco-logica.com; aude.bonnet@ecocert.com; Beatrice.Breuer@imo.ch; info@etko.org; nd@ecoglobe.am; Mary.nieland@iowaagriculture.gov; foodsafety@foodsafety.com.ar; pdescamps@eco-logica.com; p.perrone@icea.info; terry.hollifield@georgiacrop.com; ma@etko.org; Kristen.Branscum@ky.gov; info@globalculture.us; calidad@foodsafety.com.ar; herr@bcs-oeko.de; goaorg@centurylink.net; terry.hollifield@georgiacrop.com; a.moutapam@lacon-institut.org; lbd@lbd.com.br; globalculture@earthlink.net; monica@letis.org; Johanna.Phillips@agri.idaho.gov; goaorg@centurylink.net; scarlsen@co.marin.ca.us; imo@imo.ch; gwendal@ibd.com.br; juanantonio.mendoza@mayacert.com; info@ics-intl.com; Johanna.Phillips@agri.idaho.gov; spwalker@mosaorganic.org; maury.wills@iowaagriculture.gov; soh@imo.ch; wipl001@umn.edu; nop@icea.info;

dawn@ics-intl.com; knewkirk@mofga.org; adam.watson@ky.gov; maury.wills@iowaagriculture.gov; etyanich@mt.gov; info@bcs-oeko.de; nop@icea.info; CarltonN@co.monterey.ca.us; lacon@lacon-institut.org; adam.watson@ky.gov; kirriley.becker@nasaa.com.au; letis@letis.org; fischer@bcs-oeko.de; cfanta@naturesinternational.com; jstiles@marincounty.org; j.kopp@lacon-institut.org; jabbott@agri.nv.gov; FGIS OA, Maryland; internacional@letis.org; Victoria.Smith@agr.nh.gov; info@mayacert.com; jstiles@marincounty.org; Daniel.wunderlich@ag.state.nj.us; mosa@mosaorganic.org; FGIS OA, Maryland; SGerK@nmda.nmsu.edu; mncia@mncia.org; noe.rivera@mayacert.com; lisaengelbert@nofany.org; certification@mofga.org; cskolaski@mosaorganic.org; Bryan.Buchwald@ag.ok.gov; agrorganic@mt.gov; michelle.menken@mncia.org; leng@oda.state.or.us; agcomm@co.monterey.ca.us; yurlina@mofga.org; abrewster@ocia.org; sachin.ayachit@nasaa.com.au; gwebster@mt.gov; gestiondecalidad@oia.com.ar; nfccertification@gmail.com; Huntinggb@co.monterey.ca.us; hi.yoshida@omicnet.com; nics@naturesinternational.com; sachin.ayachit@nasaa.com.au; kyla@paorganic.org; Jennifer.Gornnert@agr.nh.gov; nfccertification@gmail.com; brian.mansfield@primuslabs.com; erich.bremer@ag.state.nj.us; dave@naturesinternational.com; byron.hamm@pro-cert.org; organic@nmda.nmsu.edu; ajeppson@agri.nv.gov; thughes@nsf.org; certifiedorganic@nofany.org; Jennifer.Gornnert@agr.nh.gov; ram@qcsinfo.org; organic@oeffa.org; erich.bremer@ag.state.nj.us; dkirsanovaphillips@scscertified.com; jeff.stearns@ag.ok.gov; bbakker@nmda.nmsu.edu; rhougaard@utah.gov; info@onecert.com; lori@nofany.org; Laura@nofavt.org; cid-organic@oda.state.or.us; andy@oeffa.org; srice@agr.wa.gov; organic@tilth.org; jeff.stearns@ag.ok.gov; john.young@yolocounty.org; info@occert.com; sam@onecert.com; xiao@ofdc.org.cn; kallen@oda.state.or.us; oia@oia.com.ar; connie@tilth.org; ocd@omicnet.com; susan@occert.com; pco@paorganic.org; celder@ocia.org; PrimusOrganic@primuslabs.com; xiao@ofdc.org.cn; info@pro-cert.org; pedroalanda@oia.com.ar; qai@qai-inc.com; ocd@omicnet.com; qcs@qcsinfo.org; leslie@paorganic.org; matt.green@dem.ri.gov; deborah.mansfield@primuslabs.com; organic@scsglobalservice.com; Dave.Lockman@pro-cert.org; Sally@Demeter-USA.org; irendon@nsf.org; Organic@TexasAgriculture.gov; robin@qcsinfo.org; (b) (6) @gmail.com; matt.green@dem.ri.gov; rlarsen@utah.gov; bnauman@scsglobalservices.com; Info@nofavt.org; Sally@Demeter-USA.org; organic@agr.wa.gov; Mary.Holliman@texasagriculture.gov; dennis.chambers@yolocounty.org; (b) (6) @gmail.com; rlarsen@utah.gov; Nicole@nofavt.org; bbook@agr.wa.gov; dennis.chambers@yolocounty.org

**Asunto:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

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Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

---

**From:** Ricardo Porto <rporto@caae.es>  
**Sent:** Wednesday, March 02, 2016 7:51 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** RV: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget

Our answer below in the text.

Best regards



### Ricardo J. Porto Martín

Quality Manager

[rporto@caae.es](mailto:rporto@caae.es) - caae.es

Avd. Emilio Lemos nº 2 Edificio Torre Este. Modulo 603. 41020. Sevilla.



Piensa antes de imprimir, ahorra recursos y reduce gastos

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**De:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **En nombre de** AMS - AIAinbox

**Enviado el:** martes, 1 de marzo de 2016 16:12

**Para:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>

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**Asunto:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both



systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **NO**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **NA**

In what state or country (if international) are the certified operations located (list)? **NA**

What crops do these certified operations produce (list)? **NO**

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** OIA - Gestion de Calidad <gestiondecualidad@oia.com.ar>  
**Sent:** Monday, March 21, 2016 4:22 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** RV: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget McElroy,

OIA do not certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards

Sincerely,



**Ornella Conforti**  
**Gestión de la Calidad - Organización Internacional Agropecuaria**  
[gestiondecualidad@oia.com.ar](mailto:gestiondecualidad@oia.com.ar) | [www.oia.com.ar](http://www.oia.com.ar)  
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**De:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **En nombre de** AMS - AIAinbox  
**Enviado el:** miércoles, 16 de marzo de 2016 04:30 p.m.  
**Para:** AMS - AIAinbox  
**Asunto:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

\*\*\*Original Message\*\*\*

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

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**From:** Mary Yurlina <yurlina@mofga.org>  
**Sent:** Tuesday, March 08, 2016 7:30 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** Kate Newkirk; Eric Sideman  
**Subject:** Subject: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hi Bridget:

We certify one aquaponics operation.

**Jackson McLeod & Tyler Gaudet**  
**Fluid Farms LLC**  
**972 River Rd**  
**Dresden, ME 04103**

Mailing address:

(b) (6)

**Crops:**  
lettuce, basil, Micro-greens, Tatsoi

Best regards,  
Mary

---

Mary Yurlina  
Director, MOFGA Certification Services LLC  
Unity, Maine USA  
p. 207-568-6031 f. 866-344-0991  
[www.mofgacertification.org](http://www.mofgacertification.org)

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This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

-

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

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- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11:[bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov)<<http://bridget.mcelroy@ams.usda.gov>> . You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney

Director, Accreditation and International Activities Division

## Schurkamp, Lynnea - AMS

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**From:** Dave Engel <dave@naturesinternational.com>  
**Sent:** Sunday, March 13, 2016 10:22 AM  
**To:** McElroy, Bridget - AMS  
**Cc:** Chris Fanta; Courtney, Cheri - AMS; Baron, Anne - AMS  
**Subject:** Subject: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

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Bridget,

A somewhat belated response, but better a bit late than never, in this situation....I sense. These are viable, organic production systems. We should not have our heads in the ground (only!) like ostriches, re: accepting them for organic certification. I hope the nop and the task force can bring some balance and way forward to this discussion. Good luck.

Thank you.

Dave

David J. Engel, ED  
Nature's International Certification Services LLC  
608-632-1226

*"In Nature there is abundance, with Nature there is success"*

### **Questions for Certifying Agents:**

*Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?*

**Yes.**

*If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?*

**One. In the past we also have had a few at any given time. And there are always periodic inquiries/interest.**

*In what state or country (if international) are the certified operations located (list)?*

**Three in wisconsin, two in texas, to date.**

*What crops do these certified operations produce (list)?*

**Variety of vegetables and herbs.**

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

## Schurkamp, Lynnea - AMS

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**From:** Jeff Stearns <Jeff.Stearns@ag.ok.gov>  
**Sent:** Wednesday, March 02, 2016 8:41 AM  
**To:** McElroy, Bridget - AMS

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

No.

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

N/A

In what state or country (if international) are the certified operations located (list)?

N/A

What crops do these certified operations produce (list)?

N/A

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

Please let me know if you have anymore questions. Jeff Stearns





2525 SE 3rd Street | Corvallis, OR 97333 | [www.tilth.org](http://www.tilth.org) | PH 503.378.0690 | FX 541.753.4924 | [organic@tilth.org](mailto:organic@tilth.org)

3/2/16

Attn: Cheri Courtney  
USDA NOP Accreditation and International Activities Division  
1400 Independence Avenue  
SW Room 2642-South Stop 0268  
Washington, D.C. 20250-0268

Dear Ms. Courtney,

This letter is in response to a request for information on certified aquaponic/hydroponic/aeroponic operations received on 3/1/16. Oregon Tilth Certified Organic (OTCO) does certify these systems. The majority of the operations certified by OTCO are aquaponic, with fish in a recirculating system.

OTCO currently certifies 12 operations that fall into this category, with several other operations in communication to become certified in the near future. The currently certified operations are located in Oregon, California, Hawaii, Washington, Missouri, Louisiana, Kansas, and Michigan.

The list of crops these operations are approved to produce organically includes:

Amaranth, artichoke, arugula, asparagus, azolla, bachelor button, basil, bay leaf, bean, bok choy, borgae, broccoli, broccolini, brussels sprout, cabbage, calendula, carrot, catnip, cauliflower, chard, chervil, cherry, chicory, chives, cilantro, clover, corn, cucumber, dandelion, dianthus, dill, eggplant, epazote, eucalyptus, fennel, frisee, gernaum, goji berry, green bean, honeydew, johnny jump up, kale, lambs quarter, lavender, lemon balm, lemongrass, lettuce, maca, madrone, marigold, marjoram, melon, microgreens, mint, mizuna, moringa, nasturtium, neem, oregano, pansy, parsley, pea, pepper, peppermint, potato, pumpkin, puslane, rau ram, rose, rosemary, sage, savory, snapdragon, sorrel, spearmint, spinach, squash, stinging nettle, strawberry, stevia, summer squash, tarragon, tatsoi, thyme, tomato, tomatillo, watercress, winter squash, zinnia, and zucchini.

Thank you for the work you do to support organic certification. Please let us know if you require further information.

Sincerely,

Oregon Tilth Certified Organic

## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS  
**Sent:** Thursday, March 03, 2016 4:22 PM  
**To:** Moutapam, Annette (Prüfinstitut LACON GmbH)  
**Subject:** RE: [CAUTION: Suspicious Link]WG: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Annette.

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**From:** Moutapam, Annette (Prüfinstitut LACON GmbH) [mailto:a.moutapam@lacon-institut.org]  
**Sent:** Tuesday, March 01, 2016 11:12 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** [CAUTION: Suspicious Link]WG: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

### [CAUTION: Suspicious Link]

The following message contains links to web content using **potentially** malicious URLs/links. Links structured like these are used in targeted phishing and malware attacks against USDA recipients.

Prior to trusting any links, please weigh the preceding warning by considering whether you are expecting the message below, along with a careful inspection of all links you may be considering following for spoofed or unexpected domains.

With all trusted links, and when practical, type URLs into a browser instead of clicking.

Questions: Contact Client Technology Services (CTS) via email at ([Spam.Abuse@wdc.usda.gov](mailto:Spam.Abuse@wdc.usda.gov))

Dear Bridget

Further to your message below please find the following answers on behalf of LACON GmbH, Germany:

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **No**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **None**

In what state or country (if international) are the certified operations located (list)? **None**

What crops do these certified operations produce (list)? **None**

Best regards,  
Annette Moutapam

Mit freundlichen Grüßen

Annette Moutapam  
Team International

Telefon +49 (0) 781 96679-242  
Telefax +49 (0) 781 96679-300

Mobil (b) (6)  
[a.moutapam@lacon-institut.org](mailto:a.moutapam@lacon-institut.org)  
[www.lacon-institut.com](http://www.lacon-institut.com)

Prüfinstitut LACON GmbH. Zentrale Offenburg, Moltkestr. 4, 77654 Offenburg  
HRB 471342 Amtsgericht Freiburg  
Geschäftsführung: Dr. H.-Joachim Kopp, Jürgen Schwarz

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Bio-Produkte / IFS Standards / Ohne Gentechnik / ggA, gU, gtS / GQ-Bayern / QS / GLOBALG.A.P. / RSP0 / UTZ / REDcert / ISO 9001 / KAT / Regionalfenster / GMF / HACCP / ZNU / Vegan

#### **Bio-Betriebe:**

Die deutschen Bio-Betriebe finden Sie auf der behördlich autorisierten Webseite:

<http://www.oeko-kontrollstellen.de/suchebionternehmen/SuchForm.php>

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**Von:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **Im Auftrag von** AMS - AIAinbox

**Gesendet:** Dienstag, 1. März 2016 16:12

**An:** AMS - AIAinbox

**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); 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**Betreff:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

#### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

#### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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April 19, 2017

In reply, please refer to  
2016-AMS-05787-F

Jason Cole  
Research Associate  
The Cornucopia Institute  
P.O. Box 126  
Cornucopia, Wisconsin  
[cole@cornucopia.org](mailto:cole@cornucopia.org)

Dear Jason Cole:

This is an interim response to the above referenced FOIA request which sought "all correspondence between the National Organic Program and accredited organic certifiers that discusses or describes hydroponics, aquaponics, biaponics, ponics or container growing."

A search was conducted within the Accreditation and International Activities Division of the National Organic Program, Agricultural Marketing Service. This search resulted in the identification of 212 pages of responsive records. Within this record set, 45 pages were partially redacted pursuant to exemptions (b)(4), (b)(5) and (b)(6).

Exemption (b)(4) of the FOIA protects "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential" (5 U.S.C. §552(b)(4) (2006), amended by the OPEN Government Act of 2007, Pub. L. No. 100-175, 121 Stat. 2524). This exemption is intended to protect the interests of both the government and submitters of information [See, e.g., Nat'l Parks & Conservation Ass'n v. Morton, 498 F. 2d 765, 767-70 (D.C. Cir. 1974) (concluding that the legislative history of the FOIA "firmly supports an inference that Exemption (b)(4) is intended for the benefit of persons who supply information as well as the agencies which collect it")]. The information AMS is withholding consists of confidential business information such as a product name and acreage.

Exemption (b)(5) of the FOIA protects "inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than in litigation with the agency." The Agency records that are subject to protection in full or in part under Exemption 5 are pre-decisional and/or deliberative.

As a threshold matter, the responsive records must be inter-agency or intra-agency documents in order to be protected from disclosure under Exemption (b)(5). Further, to come within the scope of Exemption (b)(5), the responsive records must fall within the coverage of a privileged record in litigation. The deliberative process privilege is one of the litigation privileges that may be invoked under Exemption (b)(5) in order to withhold responsive information. This Exemption of the FOIA protects the "decision making processes of government agencies." *NLRB v. Sears Roebuck & Co.*, 421 U.S. 132, 150 (1975); see also *Missouri ex rel. Shorr v. U.S. Army Corps of Eng'rs*, 147 F.3d 708, 710 (8th Cir. 1998) ("The purpose of the deliberative process privilege is to allow agencies freely to explore alternative avenues of action and to engage in internal debates without fear of public scrutiny.") Within this record set, AMS is withholding a deliberation about a policy issue between employees of the National Organic Program.

Exemption (b)(6) of the FOIA permits the government to withhold information regarding individuals in "personnel and medical files and similar files" when the disclosure of such information "would

constitute a clearly unwarranted invasion of personal privacy” and where such privacy interests outweigh any public interest which would be advanced by the disclosure of their contact information. As a threshold matter, Exemption (b)(6) protects not only personnel files and medical files, but “similar” files, which are interpreted by courts to cover personal information pertaining to individuals. Within this record set, AMS is withholding personal email addresses, Skype names, cell phone numbers, a signature, and information that could identify a complainant.

We will continue to process your request. You can expect to receive our next response no later than May 15, 2017.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gregory Bridges".

Gregory Bridges  
FOIA Officer  
USDA, Agricultural Marketing Service



40707 Daily Road, De Luz, CA 92028 USA

Ms. Cheri Courtney  
Director, Accreditation and International Activities Division  
National Organic Program  
November 21, 2014

Dear Ms. Courtney,

The decision made on OASIS Rootcubes/Horticubes deeply affects the ability of hydroponic growers to keep their operations in production. Hydroponic growers spend years balancing systems that use minimal inputs and provide the nutrients necessary for plant growth. OASIS Rootcubes/Horticubes are a totally inert plastic in this system, a seed container that provides support. It is the “plastic pot” of a hydroponic system. OASIS Rootcubes/Horticubes are not “rockwool” as claimed by CCOF. They are composed of plastic, a synthetic, as are many “tools” used by soil based farmers- seed trays, seedling pots, irrigation pipes, hoses, sprinklers... All of which are compliant and none of these are reviewed for compliance as a crop input.

Organic hydroponic agriculture is a “hot topic” that has many vocal opponents and some of the most innovative growers. Both Secretary of Agriculture Tom Vilsak and NOP Deputy Administrator Miles McEvoy visited A Bee’s organic hydroponic growers, many using OASIS Rootcubes/Horticubes. One of the growers was excited to hear Mr. McEvoy comment that the NOP would likely be establishing, in the very near future, a “hydroponic taskforce” to evaluate these growing practices and processes as they apply to organic certification.

Our growers are telling us they will need at least one year to transition from using Rootcubes/Horticubes to another material for the following reasons:

1. They need to identify and test new materials through 4 growing seasons: fall, winter, spring & summer
2. They need to retool automation equipment that is currently designed for Rootcubes/Horticubes

Comments from a grower: “We grow year-round. The most significant challenge is to identify and test new materials that can be used as an alternative to Rootcubes/Horticubes. Crops perform differently during the seasons and will likely require different material combinations during specific times of the year. Not having the opportunity to properly test materials during each growing season will pose a serious threat to our farm, as we are reliant on a healthy propagation system for year-round growing. We have already begun conducting new material testing – it is clear that further testing is needed to achieve uniform results.

Lastly, we will require significant capital to retool our automation equipment for a material change. For example, we have contacted two suppliers who can potentially offer such equipment and the earliest lead time that we can get is about 6 months to have equipment installed and the cost will be about \$100K – we would then still have to test the new materials.”

Because this decision appears to have been made quite hastily, and out of context, treating Rootcubes/Horticubes as a growing medium containing synthetics rather than a container composed of a synthetic (plastic), A Bee Organic is requesting a complete copy of the review of OASIS Rootcubes/Horticubes performed by the NOP. As one of our growers eloquently wrote: “I believe that the review of Rootcube and Horticube materials should be deferred for a review that evaluates hydroponics as a whole. These materials should, at least for the time being, continue to be allowed because by definition, they are part of the inert plastic irrigation system – which is allowed by NOP rules.”

Respectfully,

(b) (6)

Sarah E. J. Costin  
Co-Owner and Certification Specialist, A Bee Organic

Cc: Ro Elgas; Miles McEvoy



## Schurkamp, Lynnea - AMS

---

**From:** OMIC-OCD (Yoshida) <ocd@omicnet.com>  
**Sent:** Tuesday, March 01, 2016 9:01 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** Answer from Overseas Merchandise Inspection Co., Ltd.(OMIC)  
**Attachments:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems.eml.msg

Dear Ms. Bridget Mcleroy

We are answering to your question by the attached e-mail that we donot certify certify hydroponic, aeroponic or aquaponics operations.

Overseas Merchandise Inspection Co., Ltd. (OMIC) Hisashi Yoshida

## Schurkamp, Lynnea - AMS

---

**From:** Michelle Menken <michelle.menken@mncia.org>  
**Sent:** Wednesday, March 23, 2016 4:19 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** aquaponic/hydroponic  
**Attachments:** image003.png; image004.png

Hello Bridget,

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **Yes**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **We have two certified operations- one aquaponics and one hydroponic.**

In what state or country (if international) are the certified operations located (list)? **Both are in Minnesota.**

What crops do these certified operations produce (list)? **Here are the crop lists off the two certificates:**

#### **100% Organic Production**

Products: Aquaponic production of Arugula; Basil; Chard; Cilantro; Kale; Lettuce; Mint;  
Pak choi; Parsley; Rosemary; Spinach; Taisoi; Thyme; and Watercress

#### **100% Organic Production**

Processes: Growing in hydroponic system and packaging  
Products: Arugula; Basil; Bay leaves; Chervil; Chives; Cilantro; Dill; Lavender; Lemongrass;  
Marjoram; Mint; Oregano; Parsley; Sage; Savory; Sorrel; Tarragon; Thyme;  
Thyme (lemon); and Watercress

Yours truly,

Michelle Menken  
Organic Program  
Minnesota Crop Improvement Association/MCIA  
1-855-213-4461  
612-625-3123 (direct)



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**CAN/CGSB-32.310-2015**

Supersedes CAN/CGSB-32.310-2006

## National Standard of Canada

### Organic production systems

### General principles and management standards

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NATIONAL STANDARD OF CANADA

CAN/CGSB-32.310-2015

Supersedes CAN/CGSB-32.310-2006

# Organic Production Systems General principles and management standards

CETTE NORME NATIONALE DU CANADA EST DISPONIBLE EN VERSIONS  
FRANÇAISE ET ANGLAISE.

ICS 67.140/67.120.30

Published November 2015 by the  
**Canadian General Standards Board**  
Gatineau, Canada K1A 1G6

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*Acknowledgment is made for the translation of this National Standard of Canada by the Translation Bureau of Public Services and Procurement Canada.*

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# Introduction

## I. Description

Organic production is a holistic system designed to optimize the productivity and fitness of diverse communities within the agro-ecosystem, including soil organisms, plants, livestock and people. The principal goal of organic production is to develop operations that are sustainable and harmonious with the environment.

CAN/CGSB-32.310, *Organic Production Systems – General Principles and Management Standards*, describes the principles and management standard of organic production systems.

CAN/CGSB-32.311, *Organic Production Systems – Permitted Substances Lists*, provides lists of substances that are allowed for use in organic production systems.

As is the case for all products sold in Canada, organic inputs—such as, but not limited to, fertilizers, feed supplements, pesticides, soil amendments, veterinary treatments, processing additives or aids, sanitizing and cleaning material—and products derived from organic agriculture, such as, but not limited to, feed and food, should comply with all applicable regulatory requirements.

## II. General principles of organic production

Organic Agriculture is based on the following general principles<sup>1,2</sup>:

Principle of health – Organic agriculture should sustain and enhance the health of soil, plants, animals, humans and the planet as one and indivisible.

Principle of ecology – Organic agriculture should be based on living ecological systems and cycles, work with them, emulate them and help sustain them.

Principle of fairness – Organic agriculture should build on relationships that ensure fairness with regard to the common environment and life opportunities.

Principle of care – Organic agriculture should be managed in a precautionary and responsible manner to protect the health and well-being of current and future generations and the environment.

## III. Organic practices

Neither this standard<sup>3</sup> nor organic products produced in accordance with this standard represent specific claims about the healthiness, safety and nutrition of such organic products.

Management methods are carefully selected in order to restore and then sustain ecological stability within the operation and the surrounding environment. Soil fertility is maintained and enhanced by promoting optimal biological activity within the soil and conservation of soil resources. Weeds, pests and diseases are managed using biological and mechanical control methods, and cultural practices that include minimized tillage. Crop selection and rotation are important for managing nutrient cycling, recycling of plant and animal residues, water management, augmentation of beneficial insects to encourage a balanced predator–prey relationship, the promotion of biological diversity and ecologically-based pest management.

<sup>1</sup> From <http://www.ifoam.org/en/organic-landmarks/principles-organic-agriculture>.

<sup>2</sup> For the historical organic principles (from 2006 edition), refer to Annex B.

<sup>3</sup> References throughout this document to “this standard” refer to CAN/CGSB-32.310, *Organic Production Systems — General Principles and Management Standards*.

Under a system of organic production, livestock are provided with living conditions and space allowances appropriate to their behavioural requirements and organically produced feed. These practices strive to minimize stress, promote good health and prevent disease.

Organic products are produced and processed under a system that strives to preserve the integrity of the principles in this standard.

Organic practices and this standard cannot assure that organic products are entirely free of residues of substances prohibited by this standard and of other contaminants, since exposure to such compounds from the atmosphere, soil, ground water and other sources may be beyond the control of the operator. The practices permitted by this standard are designed to ensure the least possible residues at the lowest possible levels.

In the development of the standard, it was recognized that differences between Canada's agricultural regions require varying practices to meet production needs.

This standard is intended for certification and regulation to prevent deceptive practices in the marketplace. The certification process assesses operational compliance. Certification is granted to compliant product.

#### **IV. Notes and examples in this standard**

In this standard, notes and examples are used for giving additional information intended to assist the understanding or use of the document and are not a normative part of the standard.

# Organic production systems

## General principles and management standards

### 1 Scope

1.1 This standard applies to the following organic products:

- a) Unprocessed plants and plant products, livestock and livestock products, to the extent that the principles of production and specific verification rules for them are described in the standard;
- b) Processed agricultural crop and livestock products intended for human consumption or use and derived from the items mentioned in 1.1 a);
- c) Livestock feed;
- d) Processed agricultural crop and livestock products intended for animal consumption or use and derived from the items mentioned in 1.1 a).

1.2 Organic products referenced in this standard are derived from a production system that:

- a) seeks to nurture ecosystems through its management practices in order to achieve sustainable productivity; and
- b) provides weed, pest and disease control through enhancement of biodiversity, recycling of plant and animal residues, crop selection and rotation, water management, tillage and cultivation.

### 1.3 Units of measure

Quantities and dimensions in this standard are given in metric units with yard/pound equivalents, mostly obtained through soft conversion, given in parentheses. The metric units shall be regarded as being official in the event of dispute or unforeseen difficulty arising from the conversion.

### 1.4 Prohibited substances, materials or techniques in organic production and preparation

If producing or preparing organic products, the following substances, materials or techniques are prohibited since they are incompatible with the general principles of organic production:

- a) all products of and materials from genetic engineering (GE), as defined in this standard, and as specified in 4.1.3, 5.1.2 and 6.2.1 of CAN/CGSB-32.311;
- b) all products, materials or processes intentionally using nanotechnology, as defined in this standard, with the following exceptions:
  - 1) naturally occurring nano-sized particles or those produced incidentally through processes such as grinding flour;
  - 2) contact surfaces, such as equipment, work surfaces, or packaging, where transference of nano-sized particles to organic crops, livestock or products is unintended and unlikely to occur;
- c) irradiation, as defined in this standard, for the treatment of organic products and inputs used in the production of organic products, except as specified in CAN/CGSB-32.311;
- d) soil amendments, such as fertilizer or composted plant and animal material, that contain a substance not listed in CAN/CGSB-32.311;

- e) sewage sludge;
- f) synthetic crop production aids and materials, except as specified in CAN/CGSB-32.311;
- g) synthetic growth regulators;
- h) cloned livestock and its descendants;
- i) synthetic allopathic veterinary drugs, including antibiotics and parasiticides, except as permitted by this standard;
- j) synthetic substances used in organic product preparation, such as ingredients, food additives and processing aids, including sulphates, nitrates and nitrites, except as specified in CAN/CGSB-32.311;
- k) equipment, harvest and storage containers, storage facilities and packaging materials treated with synthetic fungicides, preservatives, fumigants and pesticides;
- l) substances that are not listed in CAN/CGSB-32.311, except as permitted in this standard.

## **2 Normative references**

The following normative documents contain provisions that, through reference in this text, constitute provisions of this National Standard of Canada. The referenced documents may be obtained from the sources noted below.

NOTE The addresses provided below were valid at the date of publication of this standard.

An undated reference is to the latest edition or revision of the reference or document in question, unless otherwise specified by the authority applying this standard. A dated reference is to the specified revision or edition of the reference or document in question.

### **2.1 Canadian General Standards Board (CGSB)**

CAN/CGSB-32.311 – *Organic production systems – Permitted substances lists.*

#### **2.1.1 Source**

The above may be obtained from the Canadian General Standards Board, Sales Centre, Gatineau, Canada K1A 1G6. Telephone 819-956-0425 or 1-800-665-2472. Fax 819-956-5740. E-mail [ncr.cgsb-ongc@tpsgc-pwgsc.gc.ca](mailto:ncr.cgsb-ongc@tpsgc-pwgsc.gc.ca). Web site [www.tpsgc-pwgsc.gc.ca/ongc-cgsb/index-eng.html](http://www.tpsgc-pwgsc.gc.ca/ongc-cgsb/index-eng.html).

### **2.2 Health Canada**

*Food and Drug Regulations* (C.R.C., c. 870).

#### **2.2.1 Source**

The above may be obtained from Health Canada at [www.hc-sc.gc.ca](http://www.hc-sc.gc.ca) or from Justice Laws Website at <http://laws-lois.justice.gc.ca>.

### **2.3 Canadian Food Inspection Agency (CFIA)**

*Health of Animals Act* (1990, c.21)

*Health of Animals Regulations* (C.R.C., c. 296)

*Safe Food for Canadians Act (S.C, 2012, c. 24).*

### **2.3.1 Source**

The above may be obtained from CFIA at <http://www.inspection.gc.ca/> or from Justice Laws Website at <http://laws-lois.justice.gc.ca.>

## **2.4 International Federation of Organic Movements (IFOAM)**

*Principles of Organic Agriculture.*

### **2.4.1 Source**

The above may be obtained from the IFOAM Web site at <http://www.ifoam.bio/en/organic-landmarks/principles-organic-agriculture.>

## **2.5 National Farm Animal Care Council (NFACC)**

*Code of Practice for the Care and Handling of Dairy Cattle*

*Code of Practice for the Care and Handling of Beef Cattle*

*Code of Practice for the Care and Handling of Pigs*

*Code of Practice for the Care and Handling of Farm Animals: Transportation.*

### **2.5.1 Source**

The above may be obtained from the NFACC Web site at <https://www.nfacc.ca/codes-of-practice.>

## **3 Terms and definitions**

For the purposes of this National Standard of Canada, the following terms and definitions apply.

### **3.1**

#### **aeroponics (aéroponie)**

soil-free cultivation method whereby plants are suspended with their roots exposed to the air.

### **3.2**

#### **agriculture product (produit agricole)**

an animal, a plant, an animal or a plant product, or a product, including any food or drink wholly or partly derived from an animal or a plant.

### **3.3**

#### **agro-ecosystem (agro-écosystème)**

system consisting of the form, function, interaction and equilibrium of the biotic and abiotic elements present within the environment of a given agricultural operation.

### **3.4**

#### **allopathic (allopathique)**

use of allopathy.

- 3.5**  
**allopathy (allopathie)**  
method of treating disease with substances that produce a reaction or effects different from those caused by the disease itself.
- 3.6**  
**annual seeding (semis annuel)**  
young plant grown from seed that will complete its life cycle or produce a yield and be able to be harvested within the same crop year or season in which it was planted.
- 3.7**  
**antibiotic (antibiotique)**  
various substances that contain any quantity of any chemical substance produced by a micro-organism, like penicillin, and that are used to inhibit or destroy the growth of micro-organisms to prevent or treat disease.
- 3.8**  
**apiculture (apiculture)**  
management and production of honeybees, queens and their products. Examples are honey, beeswax, pollen, royal jelly, propolis and bee venom.
- 3.9**  
**biobased (biosourcé)**  
substance that is derived from a plant, animal or microbial source.
- 3.10**  
**biodegradable (biodégradable)**  
capable of microbial decomposition within 24 months in soil (with the exception of plant biomass), one month in aerated water, two months in anaerobic water, with minimal impact on the environment.
- 3.11**  
**buffer zone (zone tampon)**  
clearly defined and identifiable boundary area that separates an organic production unit from adjacent non-organic areas.
- 3.12**  
**cloned animals (animaux clonés)**  
identical animal resulting from human manipulation of embryos and embryo transfer, using techniques such as somatic cell nuclear transfer, embryonic cell nuclear transfer or embryo splitting.
- 3.13**  
**commercially available (disponible sur le marché)**  
documented ability to obtain a production input or an ingredient in an appropriate form, quality, quantity or variety, irrespective of cost, in order to fulfil an essential function in organic production or preparation.
- 3.14**  
**commingling (mélange)**  
mixing of or physical contact between bulk, unbound or unpackaged organic products and non-organic products during production, preparation, transportation, or storage.
- 3.15**  
**compost (compost)**  
product of a carefully managed aerobic process by which non-synthetic materials are digested by micro-organisms.
- 3.16**  
**compost tea (thé de compost)**  
soil amendment or foliar feed used to promote beneficial bacterial growth that is created by steeping mature compost.

**3.17****crop rotation (rotation des cultures)**

practice of alternating crops grown in a specific field, in a planned sequence and in successive crop years so that crops of the same species or family are not continuously grown in the same field. Perennial cropping systems employ techniques such as alley cropping, intercropping and hedgerows to introduce biological diversity in lieu of crop rotation.

**3.18****derogation (derogation)**

exemption from the practices in CAN/CGSB-32.310.

**3.19****exception (exception)**

substance otherwise prohibited by CAN/CGSB-32.311.

**3.20****feed additive (additif pour alimentation animale)**

substance added to feed in small quantities to fulfil a specific nutritional need. Examples are essential nutrients in the form of amino acids or vitamins and minerals, and non-nutritive additives such as anticaking agents and antioxidants.

**3.21****feed supplement (supplément alimentaire)**

feed that is used in conjunction with other feed to improve the nutritive balance of the total and that is intended to be

- a) fed undiluted as a supplement to other feeds,
- b) available separately and offered free choice, along with other parts of the ration, or
- c) further diluted and mixed to produce a complete feed.

NOTE In Canada, the *Feeds Act* requires that the resulting feed is acceptable for registration.

**3.22****fertilizer (engrais)**

single or blended substance composed of one or more recognized plant nutrient(s).

**3.23****filtrate (filtrat)**

liquid that passes through an osmosis filter, in the production of maple or other tree sap syrup.

**3.24****food additive (additif alimentaire)**

has the same meaning as in B.01.001 of *The Food and Drug Regulations*.

**3.25****food-grade (qualité ou grade alimentaire)**

designation used to identify that a substance, (for example, a cleaning material, gas, etc.) or material (for example, a counter, containers, a conveyor, etc.) may come in contact with food, food contact surfaces and/or is safe for human consumption.

**3.26****forage (fourrage)**

vegetative material in fresh, dried or ensiled state that is fed to livestock, for example, pasture, hay or silage.

### 3.27

#### **genetic engineering (génie génétique)**

refers to techniques by which the genetic material of an organism is changed in a way that does not occur naturally by multiplication and/or natural recombination. Examples of the techniques used in genetic engineering include, but are not limited to:

- recombinant DNA (rDNA) techniques that use vector systems;
- techniques involving the direct introduction into the organism of hereditary materials prepared outside the organism;
- cell fusion (including protoplast fusion) or hybridization techniques that overcome natural physiological, reproductive or recombination barriers, where the donor cells/protoplasts do not fall within the same taxonomic family.

Unless the donor/recipient organism is derived from any of the above techniques, examples of techniques not covered by this definition include:

- in vitro fertilization;
- conjugation, transduction, transformation, or any other natural process;
- polyploidy induction;
- cell fusion (including protoplast fusion) or hybridization techniques where the donor cells/protoplasts are in the same taxonomic family.

### 3.28

#### **herbivore (herbivore)**

animal that feeds chiefly on plants.

### 3.29

#### **hydroponics (hydroponie)**

cultivation of plants in aqueous nutrient solutions without the aid of soil.

### 3.30

#### **incidental additives (additifs indirects)**

substances used in organic processing facilities that have the potential to remain present in organic products as residues. Examples are: hand products (cleaners, antiseptics, lotions, barrier creams), boiler water treatment compounds, water treatment compounds, lubricants (release agents, solvents), antifoaming agents and non-food chemicals (sanitizers, disinfectants, cleaning agents and detergents).

### 3.31

#### **ingredient (ingrédient)**

substance, including a food additive, used in the manufacture or preparation of a product. The substance is present in the final product, possibly in a modified form.

### 3.32

#### **input (intran)**

substance used in production or preparation. Examples are: fertilizers, feed supplements, pesticides, and soil amendments, veterinary treatments, processing aids, sanitizing and cleaning materials.

### 3.33

#### **irradiation (irradiation des aliments)**

treatment with ionizing radiation (see B.26.001 of the *Food and Drug Regulations*).



**3.34****isolation distance (distance d'isolement)**

distance established to segregate an organic crop from a commercialized GE crop of the same crop type. An isolation distance is the shortest distance from the edge of an organic crop to the edge of the nearest GE crop of that crop type.

**3.35****livestock (animaux d'élevage)**

any domestic or domesticated animal including bovine, ovine, porcine, caprine, equine, poultry and bees raised for food or used in the production of food. The products of hunting or fishing of wild animals are not included in this definition.

**3.36****manure (déjections animales)**

livestock feces, urine and other excrement, including bedding, used or soiled by livestock.

**3.37****microgreens (micro-pousses)**

edible young plants that are harvested later than sprouts, generally when cotyledons are fully formed or when two or four true leaves are present.

**3.38****nanotechnology (nanotechnologie)**

manipulation of matter at atomic, molecular, or macromolecular dimensions typically between 1 and 100 nm to create materials, devices and systems with fundamentally new properties and functions. Nanoscale chemical substances, or nanomaterials, behave differently from their macroscale counterparts, exhibiting different mechanical, optical, magnetic or electronic properties.

**3.39****non-synthetic (non synthétique)**

substance derived from mineral, plant or animal matter that has not been chemically altered.

**3.40****nutrient management plan (plan de gestion des nutriments)**

nutrient budget or plan in which the timing and rate of nutrient application is based on soil nutrient status (soil test results), crop nutrient needs, amendment (manure, compost, plow-down crop or other permitted substance), nutrient content and expected nutrient release rates. The goal of a nutrient management plan is to minimize nutrient loss, protect water quality, maintain soil fertility and ensure effective use of permitted soil amendments.

**3.41****operation (exploitation)**

farm, company or organization that produces or prepares an organic product; an operation may have multiple production units (see 3.56 *production unit*).

**3.42****operator (exploitant)**

person, company or organization that produces or prepares with a view to the subsequent marketing of products referred to as organic.

**3.43****organic integrity (intégrité biologique)**

maintenance of the inherent organic qualities of a product from the receipt of ingredients through to the end consumer.

**3.44**

**organic product (produit biologique)**

any commodity or output produced by a system compliant with this standard.

**3.45**

**organic production (production biologique)**

method of agricultural production in compliance with this standard.

**3.46**

**parallel production (production parallèle)**

simultaneous production or preparation of organic and non-organic crops, including transitional crops, livestock and other organic products of the same or similar, visually indistinguishable varieties.

**3.47**

**para-probiotics (para-probiotiques)**

“non-viable microbial cells” that are inactivated or dead micro-organisms which can prevent pathogen growth.

**3.48**

**perennial crop (culture vivace)**

crop, other than a biennial crop, that can be harvested from the same planting for more than one crop year or that requires at least one year after planting before harvest.

**3.49**

**pest (organisme nuisible)**

organism causing damage to humans or to resources used by humans, such as some viruses, bacteria, fungi, weeds, parasites, arthropods and rodents.

**3.50**

**pesticide (pesticide)**

substances used, directly or indirectly, to attract, prevent, destroy, repel or mitigate pests; or to alter the growth, development or characteristics of plants. Includes any organism, substance or mixture of substances and devices such as lures or traps.

**3.51**

**planting stock (matériel de reproduction végétale)**

plant or plant tissue, other than annual seedlings, used in plant production or propagation. Examples are rhizomes, shoots, leaf or stem cuttings, roots or tubers, bulbs or cloves.

**3.52**

**prebiotics (prébiotiques)**

fibre food and potential carriers for bacteria. Examples of prebiotic substrates are inulin, lactulose, various galacto, fructo, or xylo-oligosaccharides and sugar alcohols.

**3.53**

**preparation (préparation)**

includes, with respect to an organic product, post-harvest handling, manufacturing, processing, treatment, preservation, and slaughter.

**3.54**

**probiotics (probiotiques)**

micro-organisms that provide health benefits when consumed.

**3.55**

**processing aids (auxiliaires de production)**

substances added to food during processing, for a technological effect, but are not present in the finished product or at insignificant and non-functional levels.

**3.56****production unit (unité de production)**

identifiable portion of an operation in which production or preparation of an organic product occurs.

**3.57****prohibited substances (substances interdites)**

substances prohibited by 1.4 and/or not listed in CAN/CGSB-32.311.

**3.58****records (registres)**

information in written, visual or electronic form that documents the activities undertaken by an operator engaged in the production or preparation of organic products.

**3.59****removal event (intervention subséquente)**

procedure performed prior to organic production runs, batches or loads, to prevent organic product from coming into contact with prohibited substances or commingling with non-organic products. Examples of removal events are rinsing with potable water, letting surfaces drip-dry and purging a system with organic product.

**3.60****salt (sel)**

sodium chloride, or low-sodium and sodium-free substitutes that serve the purpose of providing salt flavour, nutrition or microbial control in a product.

**3.61****sewage sludge (boues d'épuration)**

solid, liquid or semisolid residues generated by municipal or industrial sewage treatment facilities. Sewage sludge includes but is not limited to: domestic septage; scum or solids removed in primary, secondary or advanced wastewater treatment processes; or material derived from sewage sludge.

**3.62****soil (sol)**

mixture of minerals, organic matter and living organisms.

**3.63****split production—split operation (production fractionnée—exploitation fractionnée)**

operation that produces or prepares organic and non-organic agricultural products, including transitional products.

**3.64****symbiotics (symbiotiques)**

combination of prebiotics and probiotics. Many contain a combination of probiotic culture with a prebiotic substrate that favors its growth.

**3.65****synthetic substance (substance synthétique)**

manufactured substance, including petrochemicals, formulated by a chemical process or by a process that chemically alters compounds extracted from plant, micro-organisms, animal or mineral sources. This term does not apply to compounds synthesized or produced by physical processing or biological processes, which may include heat and mechanical processing. However, minerals altered through chemical reactions caused by heating or burning shall be classified as synthetic.

**3.66****traceability (traçabilité)**

ability to track product, backwards and forwards, through all stages of production and preparation.

**3.67**

**transitional period (période de conversion)**

period of time between the start of an organic management program and the attainment of organic status by a production unit or operation.

**3.68**

**transplant (plant repiqué)**

seedling that has been removed from its original place of production, transported and replanted.

**3.69**

**veterinary biologic (produit biologique vétérinaire)**

helminth, protozoa or micro-organism; or a substance or mixture of substances derived from animals, helminths, protozoa or micro-organisms; or a substance of synthetic origin that is manufactured, sold or represented for use in restoring, correcting or modifying functions in animals or for use in the diagnosis, treatment, mitigation or prevention of a disease, disorder, abnormal physical state, or the symptoms thereof, in animals. Veterinary biologics include vaccines, bacterins, bacterin-toxoids, immunoglobulin products, diagnostic kits and any veterinary biologic derived through biotechnology.

**3.70**

**veterinary drug (médicament vétérinaire)**

substance or mixture of substances represented for use or administered in the diagnosis, treatment, mitigation or prevention of disease, disorder, abnormal physical state or its symptoms in animals; restoring, correcting or modifying functions in animals.

**3.71**

**wild crop (plante sauvage)**

plants collected or harvested in their natural habitat.

**3.72**

**yeast (levure)**

single celled micro-organisms that produce enzymes, carbon dioxide (CO<sub>2</sub>), and other metabolites from carbohydrates, whose functional roles are frequently used in the processes of fermentation, baking, flavouring foods, adding nutritional value and providing health benefits.

**3.73**

**yeast autolysate extract (extraits d'autolysats de levure)**

water-soluble components of the yeast cell, generally produced by autolysis, a process in which the rupture of cell wall is induced mechanically or chemically.

## **4 Organic plan**

**4.1** The operator shall prepare an organic plan outlining the details of transition, production, preparation and management practices.

**4.2** The organic plan shall be updated annually to address changes to the plan or management system, problems encountered in executing the plan, and measures taken to overcome such problems.

**4.3** The organic plan shall include a description of the internal record-keeping system, with documents sufficient to meet traceability requirements as specified in 4.4.2 and other record-keeping requirements.

## 4.4 Record keeping and identification

**4.4.1** The operator shall maintain records and relevant supporting documentation such as visual aids (for example, maps, work-flow charts) concerning inputs and details of their use, production, preparation and transport of organic crops, livestock and products. The operator shall maintain the organic integrity of products and shall fully record and disclose all activities and transactions in sufficient detail to be easily understood and sufficient to demonstrate compliance with this standard.

**4.4.2** Records shall make it possible to trace

- a) the origin, nature and quantity of organic products that have been delivered to the production unit or operation;
- b) the nature, quantity and consignees of products that have left the production unit;
- c) any other information for the purposes of verification, such as the origin, nature and quantity of ingredients, additives and manufacturing aids delivered to the unit, and the composition of processed products;
- d) activities or processes that demonstrate compliance with this standard.

**4.4.3** An identification system shall be implemented to distinguish organic and non-organic crops, livestock (for example, general appearance, colour, variety and types) and products.

**4.4.4** The operator shall design and implement a risk management plan to prevent GE contamination which may include strategies such as physical barriers, border rows, delayed planting, testing of seeds, isolation distances and equipment and storage sanitation protocols.

**4.4.5** Records shall be maintained for at least five years beyond their creation.

## 5 Crop production

Subclause 8.4 on Transport also applies to crops.

### 5.1 Land requirements for organic crop production

**5.1.1** This standard shall be fully applied on a production unit for at least 12 months before the first harvest of organic products. Prohibited substances shall not have been used for at least 36 months before the harvest of an organic crop.

**5.1.2** When new production units are added to an existing organic operation, the operator shall provide records to show that prohibited substances have not been used for at least 36 months (see 5.1.1) and verification shall be conducted before the first harvest of product from this new production unit.

**NOTE** The Canadian *Organic Products Regulations* require operators to document that they have not used prohibited substances. The *Organic Products Regulations* also require that, in the case of an initial application for an organic certification of field crops, the application shall be filed 15 months before the day on which the product is expected to be marketed. During that period of time, compliance with this standard will be assessed by the certification body and this assessment must include at least one inspection of the production unit, during production, in the year before field crops may be eligible for certification and one inspection, during production, in the year field crops are eligible for certification.

**5.1.3** The enterprise shall aim at a complete transition of its production. During the transition period, the enterprise can maintain, in addition to the production in transition, a non-organic system of production (split operation) that shall be entirely separate and identified separately, pending its incorporation into the overall transition process.

**5.1.4** The enterprise can be converted one unit at a time, and each converted unit shall respect the requirements of this standard. The exception to this norm, parallel production, is only allowed in the following cases: perennial crops (already planted), agricultural research facilities and production of seed, vegetative propagating materials and transplants.

**5.1.5** The following special conditions shall be observed for parallel production:

- a) The operator shall clearly demonstrate that the identity of the crops so produced can be maintained during their production, harvesting, storage, processing, packaging and marketing;
- b) The operator shall maintain verifiable, accurate records of both non-organic and organic produce and product storage, transportation, processing and marketing.

**NOTE** Parallel production crops, both organic and non-organic, are inspected just prior to harvest and an audit of all parallel production crops occurs after harvest.

**5.1.6** All production units shall have distinct, defined boundaries.

**5.1.7** Production methods shall not alternate between organic and non-organic on a production unit.

## **5.2 Environmental factors**

**5.2.1** Measures shall be taken to minimize the physical movement of prohibited substances onto organic land and crops from:

- a) adjacent areas;
- b) equipment used for both organic and non-organic crops.

**5.2.2** If unintended contact with prohibited substances is possible, distinct buffer zones or other features sufficient to prevent contamination are required:

- a) buffer zones shall be at least 8 m (26 ft 3 in.) wide;
- b) permanent hedgerows or windbreaks, artificial windbreaks, permanent roads or other physical barriers may be used instead of buffer zones;
- c) crops grown in buffer zones shall not be considered organic whether or not they are used on the operation.
- d) crops at risk of contamination from commercialized GE crops shall be protected from cross-pollination. Mitigation strategies such as but not limited to physical barriers, border rows, strategic testing or delayed planting shall be implemented unless generally accepted isolation distances for the at risk crop type are present (see Note below).

**NOTE** Generally accepted isolation distances for crops at risk of contamination from commercialized GE crop types include: soybeans – 10 m, corn – 300 m, canola, alfalfa (for seed production) and apples– 3 km.

**5.2.3** Fence posts or wood treated with substances listed in Table 4.3 of CAN/CGSB-32.311 are permitted.

- a) For new installations or replacement purposes, fence posts or wood treated with prohibited substances are prohibited unless alternatives such as metal, plastic, concrete, or protective sleeves, are not commercially available.
- b) Recycling of existing fence posts within the operation is permitted.

### 5.3 Seeds and planting stock

Organic seed, bulbs, tubers, cuttings, annual seedlings, transplants and other propagules shall be used. The following exceptions or conditions apply:

- a) Non-organic, untreated seed and planting stock or seed treated with substances listed in Table 4.3 of CAN/CGSB-32.311 are permitted provided that the organic seed or planting stock variety is:
  - 1) not produced on or available from within the operation; or
  - 2) not commercially available.
- b) Non-organic perennial planting stock treated with substances prohibited by 1.4 d), 1.4 e), 1.4 f) or 1.4 g) shall be managed in accordance with this standard for at least 12 months before the first harvest of organic product. The land on which non-organic stock is planted is subject to the requirements of 5.1.1.

### 5.4 Soil fertility and crop nutrient management

**5.4.1** The main objective of the soil fertility and crop nutrient management program shall be to establish and maintain a fertile soil using practices that maintain or increase soil humus levels, that promote an optimum balance and supply of nutrients, and that stimulate biological activity within the soil.

**5.4.2** Where appropriate, the soil fertility and biological activity shall be maintained or increased, through:

- a) crop rotations that are as varied as possible and include plough-down, legumes, catch crops and deep-rooting plants;
- b) incorporation of plant and animal matter in compliance with this standard and with Table 4.2 of CAN/CGSB-32.311, including the following:
  - 1) composted animal and plant matter;
  - 2) non-composted plant matter, specifically legumes, plough-down crops or deep-rooting plants within the framework of an appropriate multiyear rotation plan; and
  - 3) unprocessed animal manure, including liquid manure and slurry, subject to the requirements of 5.5.1.

**5.4.3** Tillage and cultivation practices shall maintain or improve the physical, chemical and biological condition of soil, and minimize damage to the structure and tilth of soil, and soil erosion.

**5.4.4** Plant and livestock materials shall be managed to maintain or improve soil organic matter content, crop nutrients, and soil fertility, and in a manner that does not contribute to the contamination of crops, soil or water, by plant nutrients, pathogenic organisms, heavy metals or prohibited substances residue.

**5.4.5** The organic matter produced on the operation shall be the basis of the nutrient cycling program. It may be supplemented with other organic and non-organic nutrient sources. Non-organic sources shall be listed in Table 4.2 of CAN/CGSB-32.311. Manure is also subject to the requirements of 5.5.1.

**5.4.6** Burning to dispose of crop residue produced on the operation is prohibited. However, burning may be used for documented pest, disease or weed problems (see 5.6.1) or to stimulate seed germination.

## 5.5 Manure management

### 5.5.1 Manure sources

Animal manure produced on the operation shall be used first. When all available manure is used up, organic manure from other sources may be used. If organic manure is not commercially available, non-organic manure is permitted provided that:

- a) the non-organic source is not a fully caged system in which livestock cannot turn 360°; and
- b) livestock is not permanently kept in the dark; and
- c) the source and quantity of manure, type of livestock, and evaluation of the criteria in 5.5.1 a) and 5.5.1 b) shall be recorded.

**NOTE** Organic operations should make it a priority to use manure obtained from transitional or extensive livestock operations, not from landless livestock production units or from livestock operations that use genetically engineered (GE) ingredients and/or GE derivatives in animal feeds.

### 5.5.2 Land application of manure

**5.5.2.1** The manure application program shall address land area, rate of application, time of application, incorporation into the soil and retention of nutrient components.

**5.5.2.2** Soil amendments including liquid manure, slurries, compost tea, solid manure, raw manure, compost and other substances listed in Table 4.2 of CAN/CGSB-32.311, shall be applied to land in accordance with good nutrient management practices.

**NOTE** In Canada, some additional provincial requirements may also apply.

**5.5.2.3** Where manure is applied, the soil shall be sufficiently warm and moist to ensure active bio-oxidation.

**5.5.2.4** The seasonal timing, rate and method of application shall ensure that manure does not:

- a) contribute to the contamination of crops by pathogenic bacteria;
- b) run off, significantly, into ponds, rivers and streams;
- c) contribute, significantly, to ground and surface water contamination.

**5.5.2.5** The non-composted solid or liquid manure shall be

- a) incorporated into the soil at least 90 days before the harvest of crops that do not come into contact with soil and are intended for human consumption; or
- b) incorporated into the soil at least 120 days before the harvest of crops that have edible parts that come into direct contact with the surface of the soil or with soil particles.

**5.5.2.6** If livestock is used as part of the cropping or pest control program, a management plan shall be in place to ensure that livestock is controlled and that manure or manure related contamination does not reach the portion of the crop intended for harvest.

### 5.5.3 Manure processing

Processing of animal manure using physical (for example, dehydration), biological or chemical treatment with substances listed in Table 4.2 of CAN/CGSB-32.311 is permitted. Loss of nutritional elements due to processing shall be minimized.



## 5.6 Crop pest, disease and weed management

**5.6.1** Pest, disease and weed control practices shall focus on organic management practices that enhance crop health and reduce losses due to weeds, disease and pests. Management practices include cultural practices (for example, rotations, establishment of a balanced ecosystem, and use of resistant varieties), mechanical techniques (for example, sanitation measures, cultivation, traps, mulches and grazing) and physical techniques (for example, flaming against weeds, heat against diseases).

**5.6.2** When organic management practices alone cannot prevent or control crop pests, disease or weeds, a biological or botanical substance, or other substances listed in Table 4.3 of CAN/CGSB-32.311, may be used. Conditions for and of the use of substances shall be documented in the organic plan (see clause 4).

**5.6.3** If application equipment, such as sprayers, is used to apply prohibited substances, it shall be thoroughly cleaned prior to use in an organic crop.

## 5.7 Irrigation

The irrigation of organic crops is permitted provided that the operator documents precautions taken to prevent contamination of land and products with substances not included in CAN/CGSB-32.311.

## 5.8 Crop product preparation

Wherever organic product preparation takes place, 8.1 and 8.2 apply.

## 5.9 Facility pest management

Subclause 8.3 applies to pest management practices in and around crop facilities.

# 6 Livestock production

Livestock excludes apiculture which is covered in 7.1. Subclause 8.4 on Transport applies when organic livestock is transported.

## 6.1 General

**6.1.1** Livestock can make an important contribution to an organic agricultural system by

- a) improving and maintaining the fertility of the soil;
- b) managing the flora through grazing; and
- c) enhancing biodiversity and facilitating complementary interactions on the operation.

**6.1.2** Organic livestock products shall be from livestock raised according to this standard.

**6.1.3** Livestock production is a land-related activity.

- a) Herbivores shall have access to pasture during the grazing season and access to the open air at other times whenever weather conditions permit:
  - 1) calculated on the basis of dry matter intake, the consumption of grazed forage by ruminants that have reached sexual maturity shall represent a minimum of 30% of the total forage intake;
  - 2) consumption of grazed forage shall rise above 30% during high forage growth periods;

- 3) a minimum of 0.13 ha (0.33 ac.)/animal unit shall be devoted to grazing. [One animal unit = one cow or one bull, or two calves, each 102 to 227 kg (225 to 500 lb) or five calves, each less than 102 kg (225 lb), or four ewes and their lambs, or six does and their kids];
- b) Other livestock, including poultry, shall have access to the outdoors whenever weather conditions permit;
- c) Winter-only production of poultry is restricted to operations that are able to comply with land-related requirements for the specific livestock type, regardless of the time of year (see 6.13.9);
- d) Derogations in 6.7.2 and 6.11 may apply.

**6.1.4** Livestock stocking rates shall correspond to local agri-climatic conditions and take into consideration feed production capacity, stock health, nutrient balance and environmental impact.

**6.1.5** Livestock management shall aim to utilize natural breeding methods, minimize stress, prevent disease, progressively eliminate the use of chemical allopathic veterinary drugs, including antibiotics, and maintain animal health and welfare.

**6.1.6** As a general principle, the operator shall demonstrate their commitment to animal welfare. When an animal welfare issue is identified, the operator shall develop a corrective action plan. The operator shall document demonstrated improvements in animal welfare practices and shall make available upon request any documents or assessments mandated by industry associations.

## **6.2 Origin of livestock**

**6.2.1** Livestock breeds, strains and types shall be

- a) suitable for and able to adapt to site-specific conditions within the local environment and production system;
- b) known for their absence of disease and health problems, specific to breeds or strains;
- c) recognized for their vitality and resistance to prevalent diseases and parasites.

**6.2.2** Livestock breeders shall

- a) use natural methods of reproduction. Artificial insemination is permitted, including the use of sexed semen if it is mechanically separated;
- b) not use embryo transfer techniques or breeding techniques using genetic engineering or related technology;
- c) not use reproductive hormones to trigger and synchronize estrus.

**6.2.3** Livestock used for organic livestock products shall

- a) be born or hatched on organic production units;
- b) be the offspring of organic parents;
- c) be managed organically throughout their lifetime;

**6.2.3.1** Exceptions to 6.2.3 a), b), and c) apply to poultry:

- a) poultry products shall be from poultry that has been under continuous organic management, beginning no later than the second day of life; and
- b) neither day-old chicks nor the fertilized eggs they hatched from shall be given medication other than vaccines;

**6.2.3.2** An exception to 6.2.3 a), b) and c) applies when herds and individual animals are converted to organic production:

- a) animals used for milk production shall have been under continuous organic management for at least 12 months; and
- b) animals used for meat shall have been under continuous organic management from the beginning of the last third of the dam's gestation period.

**6.2.4** Animals purchased for breeding shall be organic. However:

- a) if suitable organic breeding stock is not commercially available, non-organic, non-gestating breeder animals and breeding males may be brought onto an organic operation and integrated into the organic system. Meat from such animals shall be non-organic;
- b) if transferred outside the organic operation, livestock obtained from non-organic sources in accordance with 6.2.4 a) shall be considered non-organic, either for breeding or slaughter;
- c) when expanding a herd and increasing the land-base, breeding stock brought on to the operation may graze third-year transitional pasture until the end of the second trimester.

**6.2.5** Livestock or livestock products removed from an organic operation and subsequently managed on a non-organic operation shall be considered non-organic.

### **6.3 Transition of livestock production units to organic production**

**6.3.1** If an entire dairy herd is under conversion to organic production, the operator shall:

- a) provide, in the first nine months of the 12-month transition period, a minimum of 80% feed, calculated in terms of dry matter intake, that is either organic or raised on land included in the organic system plan and that is managed in accordance with clause 5 of this standard;
- b) provide only organic feed during the final three months of the 12-month transition period.

**6.3.2** Transition of land intended for feed crops or pasture shall comply with 5.1.

**6.3.3** When an animal production unit, with an entire herd, or a flock of sheep, is in transition to organic production, pasture and feed produced during the final 12 months of the land transition period may be considered organic when consumed by livestock on the same production unit. This feed and forage shall not be considered organic outside the production unit.

### **6.4 Livestock feed**

**6.4.1** The operator shall provide an organic feed ration that is balanced to meet the nutritional requirements of the livestock.

**6.4.2** Livestock feed shall consist of substances that are necessary and essential for animal health, well-being and vitality, and that meet the physiological and behavioural needs of the species in question.

**6.4.3** Specific livestock rations shall take the following into account:

- a) for young mammals, the need for natural milk, including colostrum, within the first day of life;
- b) in dairy operations, calves, lambs and kids may be taken from their mothers at the age of 24 h, provided that they receive colostrum. If contagious diseases are present in the herd, removal can occur sooner provided that calves, lambs and kids receive colostrum;

- c) calves shall be given fresh, whole, organic milk or reconstituted organic milk, until the age of three months;
- d) lambs and kids shall be given fresh, whole, organic milk or reconstituted organic milk, until the age of two months or a weight of 18 kg (39.7 lb);
- e) if they are not nursing, young animals shall be fed to meet their nutritional requirements and to achieve optimal growth and health, using artificial teats to satisfy their motivation to suck;
- f) dairy calves shall have access to solid food at all times;

NOTE Refer to the *Code of Practice for the Care and Handling of Dairy Cattle* for recommendations on colostrum feeding and the quantity of milk to be fed to dairy calves.<sup>4</sup>

- g) for ruminants, at least 60% of dry matter in daily rations shall consist of: hay; fodder that is fresh or dried; or ensiled forage, for example, fermented grass, legumes, and corn plants. An increased grain ration is permitted to ensure that nutritional requirements are met during uncommonly cold periods or when forage quality is compromised due to extraordinary weather events.
- h) if ensiled forage is fed to ruminants, at least 15% of the total dry matter in daily rations shall consist of long-fibre forage, that is, greater than 10 cm (4 in.) stem length. When ensiled corn is fed, unless there is analysis to the contrary, it shall be considered 40% grain/60% forage. The proportion of grain in ensiled corn shall be included in the percentage of grains in the ration (see 6.4.3 g);
- i) in the finishing phase, poultry shall be given grain.
- j) poultry and pigs shall be given vegetable matter other than grain.
- k) poultry shall be fed daily. A “skip-a-day” feeding regime for breeding birds is prohibited.
- l) rabbits shall be given forage, such as grass and hay, and have access to material that keeps teeth healthy, such as gnawing blocks, root vegetables and tree branches. Substances in gnawing blocks shall be listed in Table 5.2 of CAN/CGSB-32.311.

**6.4.4** The following feed, feed additives and supplements are prohibited:

- a) feed and feed additives, including amino acids and feed supplements, that contain substances not listed in Table 5.2 of CAN/CGSB-32.311;
- b) feed medications or veterinary drugs, including hormones and prophylactic antibiotics, to promote growth;
- c) approved feed supplements or additives, used in amounts above those required for adequate nutrition and health maintenance for the species at its specific stage of life;
- d) feeds that are chemically extracted or defatted with prohibited substances;
- e) feed that contains mammalian or avian slaughter by-products;
- f) feed that contains synthetic preservatives;
- g) silage preservation products, unless they are listed in Table 5.2 of CAN/CGSB-32.311;
- h) synthetic appetite- or flavour-enhancers;

<sup>4</sup> In this standard, Codes of Practice or Code of Practice refers to Canada’s best practices for the care and handling of livestock (<https://www.nfacc.ca/codes-of-practice>).

- i) feed formulas that contain manure or other animal waste; and
- j) feed that contains synthetic colouring-agents.

**6.4.5** Livestock of all ages shall be given clean, fresh water on demand. The main water source shall be tested initially for potential livestock toxins, for example, heavy metals, ions and bacteria, according to livestock drinking water quality guidelines. Thereafter, the water source shall be tested annually for bacterial contamination. If colony forming unit (CFU) levels are higher than 100/100 mL, remedial action shall be taken.

**6.4.6** Force feeding of ducks and geese is prohibited.

**6.4.7** By derogation, non-organic feed is permitted under the following circumstances:

- a) if organic feed is unobtainable as the result of a catastrophic event with direct impact on the production unit (for example, fire, flood, or extraordinary weather conditions), non-organic feed may be used for a maximum of ten consecutive days, to ensure a balanced livestock ration. Non-organic feed, from land in transition to organic production and free of prohibited substances, shall be used in preference to non-organic feed;
- b) in the event of regional shortages, breeding herds may be given non-organic forage, provided that the animals are segregated, visually distinguishable (for example, have ear tags and age verification records) and record keeping is maintained. Forage from land in transition to organic production and free of prohibited substances shall be used in preference to non-organic forage. Genetically engineered forage crops are prohibited at all times. In all other respects, breeding herds whose offspring is intended for organic products shall be under organic management at all times. The breeding herd shall be re-transitioned when an organic forage supply becomes available. Subclause 6.2.3 applies to any offspring. The organic status of other livestock on the operation is not affected.

## **6.5 Transport and handling**

**6.5.1** Livestock shall be managed responsibly, with care and consideration. Stress, injury and suffering shall be minimized in all livestock handling practices, including transport and slaughter.

**6.5.2** Stocking density within transport vehicles shall conform to recommendations in the *Code of Practice for the Care and Handling of Farm Animals: Transportation*. The use of electrical stimulation or allopathic tranquilizers is prohibited.

**6.5.3** While in transit and before slaughter, animals shall have shelter against inclement weather, such as, wind, rain and excessive heat or cold.

**6.5.4** If possible, animals shall be transported directly from the operation to their final destination.

**6.5.5** The duration of transportation shall be as short as possible. If animals are in transit for more than 5 h, recommendations regarding maximum transit times and minimum feed and water requirements, and rest times, as provided in the *Code of Practice for the Care and Handling of Farm Animals: Transportation*, shall apply. If these recommendations are not followed, justification shall be provided.

**6.5.6** Fitness for transport shall be assessed before loading. Sick or unfit animals shall not be transported, for example, those that are injured, lame, emaciated, in late gestation or heavily lactating.

**6.5.7** If livestock is unfit for transport and euthanasia is necessary, it shall be performed by competent personnel with appropriate equipment. The method used shall be quick and cause the least possible pain and distress.

NOTE In Canada, see also the *Health of Animals Regulations* under the *Health of Animals Act* (Canadian Food Inspection Agency). For guidance, refer to the transportation requirements in the *Code of Practice* for each animal type.

## **6.6 Livestock health care**

**6.6.1** The operator shall establish and maintain preventative livestock health care practices, including:

- a) the choice of appropriate breeds or strains of livestock, as specified in 6.2.1;
- b) a feed ration sufficient to meet the nutritional requirements of the livestock, including vitamins, minerals, protein, fatty acids, energy sources, and fibre;
- c) housing, pasture conditions, space allowance and sanitation practices, that minimize crowding and the occurrence and spread of disease and parasites;
- d) conditions appropriate to the species that allow for exercise, freedom of movement, and minimal stress;
- e) prompt treatment for animals with detectable disease, lesions, lameness, injury and other physical ailments;
- f) vaccines, in accordance with this standard and Table 5.3 of CAN/CGSB-32.311, if it has been documented that the targeted diseases are communicable to livestock on the production unit and/or operation and cannot be combated by other means.

**6.6.2** The operator shall not administer:

- a) veterinary drugs, in the absence of illness, other than vaccines. Anaesthetics and analgesics are permitted, subject to the requirements for physical alterations in 6.6.4;
- b) synthetic substances to stimulate or retard growth or production, including hormones for growth promotion;
- c) synthetic parasiticides, except by way of derogations provided in 6.6.11;
- d) antibiotics to meat animals or to birds for meat or egg production;
- e) chemical allopathic veterinary drugs for preventative treatments, for example, pharmaceuticals, antibiotics, hormones and steroids.

**6.6.3** Hormonal treatment shall only be used for therapeutic reasons and under veterinary supervision. The meat from treated animals shall not be organic unless the treatment is listed in Table 5.3 of CAN/CGSB-32.311.

**6.6.4** Physical alterations are prohibited, unless they are essential for animal health, welfare or hygiene, for identification or for safety reasons.

a) The following physical alterations are permitted; restrictions in 6.6.4 c) apply:

- 1) castration of piglets, lambs, kids and calves;
- 2) tail docking of lambs;
- 3) branding and ear tagging; and
- 4) dehorning and debudding.

b) If they are the only remaining option, the following physical alterations are permitted; restrictions in 6.6.4 c) apply:

- 1) minimal beak trimming or treatment to remove sharp hook;
- 2) trimming of needle teeth in piglets; and

- 3) tail docking of pigs and cattle.
- c) Restrictions on physical alterations:
- 1) physical alterations shall be carried out in a manner that minimizes pain, stress and suffering;
  - 2) regardless of age or method, consideration shall be given to the use of anaesthetics, sedatives and non-steroid anti-inflammatory analgesics, such as lidocaine, xylazine, and ketoprofen;
  - 3) for castration, tail docking, dehorning and branding, operators shall consult the applicable Code of Practice and follow the requirements for age restrictions and methods and the use of pain control medications;
  - 4) beak trimming of birds, tail docking of pigs and trimming of needle teeth in piglets are permitted when they are necessary to control problem behaviour that has a negative impact on the welfare of other livestock. Operators shall document the other measures taken to control or eliminate problem behaviour;
  - 5) tail docking of cattle is permitted only when necessary for veterinary treatment of injured animals;
  - 6) castration of piglets shall take place in the first two weeks of life. Castration of cull boars is prohibited; and
  - 7) spaying of female beef cattle is prohibited.

**6.6.5** Biological, cultural, and physical treatments and practices outlined in Table 5.3 of CAN/CGSB-32.311 are permitted, if preventative practices and vaccines are inadequate to prevent sickness or injury and treatment is required.

**6.6.6** Medical treatment shall not be withheld from sick or injured livestock to preserve their organic status. If methods acceptable to organic production fail, all appropriate medications shall be used to restore livestock to health.

**6.6.7** If the presence of injured or diseased livestock presents a health risk to individual animals or birds, they shall be separated from the herd or flock, and/or euthanized, if necessary (see 6.6.13).

**6.6.8** Shipping diseased livestock to slaughter is prohibited, if the end product is intended for human consumption.

**6.6.9** Products from sick animals or those undergoing treatment with restricted substances shall not be organic or fed to organic livestock.

**6.6.10** The use of veterinary medicinal substances shall comply with the following:

- a) if no alternative treatments or management practices exist, veterinary biologics, including vaccines, parasiticides or the therapeutic use of synthetic medications may be administered, provided that such medications are permitted by this standard and Table 5.3 of CAN/CGSB-32.311 or are required by law.
- b) phytotherapeutic medicines, that is, botanical compounds such as atropine, butorphanol and other medicines from herbaceous plants, excluding antibiotics; and homeopathic or similar products, shall be used in preference to chemical, allopathic veterinary drugs or antibiotics, provided that they are effective for the species and the condition for which the treatment is intended.
- c) if the products permitted by 6.6.10 a) and b) are ineffective in combating illness or injury, prescribed veterinary drugs, not enumerated in this standard and/or in Table 5.3 of CAN/CGSB-32.311, may be administered with written authorization by a veterinarian. If meat animals are treated, some restrictions apply (see 6.6.2, 6.6.11 d) and 6.6.12).



- d) if a veterinary drug is administered and it does not have specific withdrawal requirements, a withholding period twice the label requirement or 14 days, whichever is longer, shall be observed before livestock products from treated animals may be considered organic.
- e) in emergencies, antibiotic treatment of dairy animals is permitted under the following conditions:
  - 1) the operator shall have written instructions from a veterinarian indicating the product and the treatment method to be used;
  - 2) treatment shall result in a milk withdrawal period of at least 30 days, after the last day of a course of treatment, or a withholding period that is twice the label requirement, whichever is longer;
  - 3) antibiotic use shall be documented in herd health records;
  - 4) if dairy animals receive more than two treatments of veterinary drugs annually, whether of antibiotics, parasiticides, or one of each, they shall lose their organic status and go through a 12-month transition period;
  - 5) dairy animals with chronic conditions that require repeated use of antibiotics shall be removed from the herd.

**6.6.11** Organic livestock operations shall have a comprehensive plan to minimize parasite problems. The plan shall include preventative measures, such as pasture management, fecal monitoring and emergency measures in the event of a parasite outbreak. By way of derogation, if preventative measures fail, due to climatic conditions for example, or other uncontrollable factors, the operator may use parasiticides that are not listed in Table 5.3 of CAN/CGSB-32.311, provided that:

- a) observation of the animal or fecal test results, as appropriate for the species, indicate that livestock is infected with parasites;
- b) the operator has written instructions from a veterinarian indicating the product and method to be used;
- c) withdrawal times are twice the label requirement or 14 days, whichever is longer;
- d) meat animals less than 12 months old receive only one treatment. Older meat animals shall receive a maximum of two treatments. Meat animals that require additional treatment shall lose their organic status;
- e) dairy animals that receive more than two treatments in a 12-month period, whether of parasiticides, antibiotics or one of each, shall lose their organic status and go through a 12-month transition period. Meat animals that receive more than two treatments of parasiticides shall never be organic;
- f) a dam may be treated during gestation;
- g) laying hens that receive more than one treatment in a 12-month period shall lose their organic status. Treatment of the flock, rather than individual hens, is permitted;
- h) the operator provides a written action plan, with a timeline, describing how they will amend their parasite control plan, to avoid similar emergencies.

**6.6.12** Poultry or breeding livestock treated with a parasiticide or veterinary drug not listed in Table 5.3 of CAN/CGSB-32.311 shall be considered non-organic meat animals. Exceptions pertaining to parasiticide use may apply (see 6.6.11).

**6.6.13** Injured, diseased or sick animals shall be given individual treatment designed to minimize pain and suffering, which may include euthanasia.



**6.6.14** Forced moulting of poultry is prohibited.

## **6.7 Livestock living conditions**

**6.7.1** The operator shall establish and maintain animal living conditions that accommodate the health and natural behaviour of animals, including:

- a) access to the outdoors, shade, shelter, rotational pasture, exercise areas, fresh air and daylight, suitable for the species and stage of production taking into consideration the climate and the environment;
- b) access to fresh water (see 6.4.5) and high-quality feed that meets the needs of the animal;
- c) sufficient space and freedom to lie down in full lateral recumbence, stand up, stretch limbs and turn freely, and to express normal patterns of behaviour;
- d) space allowances in proportion to local conditions, feed production capacity of the operation, livestock health, nutrient balance of livestock and soils, and environmental impact;
- e) production techniques that foster the long-term health of livestock, especially when high levels of production or growth rates are required of animals;
- f) good air quality. Humidity, dust particles and ammonia levels shall not impair the well-being of animals. Ammonia levels shall not exceed 25 ppm. If levels exceed 25 ppm, remedial action shall be taken;
- g) appropriate resting and bedded areas that meet the needs of the animal. Indoor areas shall be large enough, solidly built, comfortable, clean and dry. Resting areas shall be covered with a thick layer of dry bedding that absorbs excrement. If organic bedding is commercially unavailable, non-genetically engineered bedding material that is free of prohibited substances for at least 60 days prior to harvest may be used;
- h) housing with non-slip floors. Solid flooring is preferable. Where non-slip slatted floors exist, the floor shall not be entirely of slatted or grid construction. The floor design shall ensure that the feet of the smallest animal cannot get caught in a void. Areas between voids shall be at least as wide as the feet of the animals;
- i) animals that give birth indoors shall be provided with sufficient space and a clean, dry, well-bedded space with stable footing. Birthing facilities must allow for separation from other animals and all the mother's needs shall be accommodated, including milking and nursing, until the mother is recovered from the birthing process. Animals shall not be tied or tethered when giving birth;
- j) management of outdoor runs and pasture so that soil degradation, long-term damage to vegetation and the contamination of water are avoided.

**6.7.2** Access to the outdoors and freedom of movement may be restricted for the following reasons, provided that confinement is temporary:

- a) inclement weather;
- b) conditions in which livestock health or safety is jeopardized, given the stage of production; and
- c) soil, water or plant quality would be compromised.

The operator shall document the reasons for and duration of confinement.

**6.7.3** The continuous tethering of livestock is prohibited, with an exemption for dairy cattle under conditions specified in 6.12.2.

**6.7.4** Housing, pens, runs, equipment and utensils shall be cleaned and disinfected to prevent cross infection and build-up of disease-carrying organisms. Appropriate cleaners and disinfectants shall be used, giving preference to substances listed in Tables 5.3, 7.3 and 7.4 of CAN/CGSB-32.311. In the event of a reportable disease, any effective disinfectant may be used to clean housing, pens and runs. Such uses shall be documented. For equipment that comes into contact with food products, the requirements in 8.2 apply, and substances listed in Tables 7.3 and 7.4 of CAN/CGSB-32.311 are permitted.

**6.7.5** All livestock in a production unit shall be managed organically. If they are clearly identified and managed organically, individual, non-organic animals may be present in the production unit. Non-organic livestock production units may be present on an operation, if they are clearly identified and kept separate from organic livestock production units.

**6.7.6** Organic animals may graze with non-organic animals on common land, that is, crown range or community pasture, provided that:

- a) documentation confirms that the land has not been treated with prohibited substances for at least 36 months;
- b) documentation confirms that healthcare and feed products available to organic livestock while on common land are in accordance with this standard;
- c) identification permits clear distinction between organically and non-organically raised animals.

## **6.8 Manure management**

**6.8.1** Manure management practices used to maintain areas in which livestock is housed, penned or pastured shall be implemented in a manner that minimizes soil and water degradation.

**6.8.2** Manure storage and handling facilities, including composting facilities, shall be designed, constructed and operated to prevent contamination of ground and surface water. See also 5.5.2.

## **6.9 Livestock product preparation**

Wherever organic livestock product preparation takes place (for example, facilities used for milking), 8.1 and 8.2 apply.

## **6.10 Pest management**

Subclause 8.3 applies to pest management practices in and around livestock facilities.

## **6.11 Additional requirements for cattle, sheep and goats**

**6.11.1** Herbivores shall have access to pasture during the grazing season. At other times, they shall have access to the open air or an outdoor exercise area, weather permitting. Exceptions to the pasture requirement can be made for:

- a) breeding males;
- b) cattle that are confined to outdoor lots during the final finishing phase. Lots shall provide at least 23 m<sup>2</sup>/animal (246 ft<sup>2</sup>) for 363 kg (800 lb) finishers and increase to 46.5 m<sup>2</sup> (500 ft<sup>2</sup>)/animal for 545 kg (1200 lb) finishers;
- c) young animals, when it can be documented that their health and welfare are jeopardized.

**6.11.2** Minimum indoor and outdoor space requirements for cattle are shown in Table 1 below.

**Table 1 Minimum indoor and outdoor space requirements for cattle**

<b>Cattle</b>	<b>Indoor space</b>	<b>Outdoor runs and pens</b>
<b>Adult beef cows</b>	6 m <sup>2</sup> (65 ft <sup>2</sup> )/head	9 m <sup>2</sup> (97 ft <sup>2</sup> )/head
<b>Dairy cows – tie stalls</b>	Stall size appropriate for size of cow	6.5 m <sup>2</sup> (70 ft <sup>2</sup> )/head in spring and fall when not on pasture
<b>Dairy cows – bedded pack</b>	11 m <sup>2</sup> (118 ft <sup>2</sup> )/head	No minimum area required
<b>Dairy cows – individual maternity pens<sup>a</sup></b> NOTE 1 maternity pen per 35 cows is recommended.	15 m <sup>2</sup> (161 ft <sup>2</sup> )/head	—
<b>Dairy cow – group maternity pens<sup>b</sup></b>	11 m <sup>2</sup> (118 ft <sup>2</sup> )/head	—
<b>Calves and young cattle</b>	2.5 m <sup>2</sup> (27 ft <sup>2</sup> )/head for young calves; increasing to 5 m <sup>2</sup> (54 ft <sup>2</sup> )/head for growing steers and heifers (12 months old)	5 m <sup>2</sup> (54 ft <sup>2</sup> )/head to 9 m <sup>2</sup> (97 ft <sup>2</sup> )/head, depending on the size of animals
<p><sup>a</sup> With justification, space requirements may be reduced for small breeds of cattle.</p> <p><sup>b</sup> With justification, when new constructions or major renovations are underway, the addition of maternity pens can be integrated into the building plan (see 6.12.1.1 b).</p>		

### 6.11.3 Sheep and goat housing

Minimum indoor and outdoor space requirements for sheep and goats are shown in Table 2.

**Table 2 Minimum indoor and outdoor space requirements for sheep and goats**

<b>Indoor space</b>	<b>Outdoor runs and pens</b>
1.5 m <sup>2</sup> (16 ft <sup>2</sup> )/head plus 0.35 m <sup>2</sup> (3.8 ft <sup>2</sup> )/ head for each additional lamb/kid	2.5 m <sup>2</sup> (27 ft <sup>2</sup> )/head plus 0.5 m <sup>2</sup> (5.4 ft <sup>2</sup> )/head for each additional lamb/kid

## 6.12 Additional requirements for dairy cattle housing

### 6.12.1 Dairy cattle housing

**6.12.1.1** Tie stalls, in existing dairy barns, may be used for lactating dairy cows, and for a period of one month for the training of heifers raised in loose housing. Tie stalls are prohibited in new construction and major renovations.

- a) If tie stalls are used during the winter season, dairy cows shall have an exercise period every day whenever possible, or at least twice a week.
- b) If construction of new infrastructure is required in order to comply with 6.12.1.1, operators are granted an exemption that permits the use of existing infrastructure for five years following the date of publication of this standard, provided that a plan for the new construction or renovation is in place one year after the publication and:

- 1) tethered cows shall have an exercise period every day, whenever possible, but at least twice a week, OR
- 2) there shall be no tethering of heifers or dry cows.

**6.12.1.2** In a free-stall system, the ratio of cows to stalls shall not exceed 1:1.

**6.12.1.3** Electric trainers are allowed on existing tie-stall operations and prohibited in new constructions or major barn renovations. All use of electric trainers shall be discontinued within five years from the date of publication.

- a) When electric trainers are used, the applicable requirements and recommendations of the *Code of Practice for the care and handling of dairy cattle* shall be followed. In addition, the following restrictions apply:
  - 1) Electric cow trainers shall only be continually activated for the first week that cows are spending nights in the barn, and thereafter shall only be switched on for a maximum of two days per week to reinforce the initial training;
  - 2) Electric trainers shall be located above a contact safety bar to alert the cow that she is getting close to the trainer.
- b) The tails of cows in stalls may be tied to prevent the tail from lying in the gutter, provided that the tying allows for natural behaviour, free movement of the tail and quick release when necessary.

**6.12.1.4** If milking parlours are in use:

- a) operators shall minimize animal waiting time between the time they are moved to the holding area and the time they return to the barn or pasture;
- b) portable milking units shall be available for sick or weak animals that are unable to make it to the milking parlour;
- c) electric crowd gates are prohibited;
- d) non-slip flooring shall be used in the holding area, parlour and alleys.

**6.12.1.5** Calves may be housed in individual pens and hutches, up to three months of age, provided that the following conditions are met:

- a) they are not tethered and have enough room to turn around, lie down, stretch out when lying down, get up, rest and groom themselves;
- b) individual pens are designed and located so that each calf can see, smell and hear other calves;
- c) Individual pens have an area of at least 2.5 m<sup>2</sup> (27 ft<sup>2</sup>) and a minimum width of 1.5 m (4.9 ft);
- d) outdoor hutches shall have access to an enclosed yard or run.

**6.12.1.6** Calves shall be group-housed after weaning.

**6.12.1.7** Dairy replacement calves over nine months of age shall have access to pasture, as appropriate for the season.

## **6.13 Additional requirements for poultry**

**6.13.1** The operator shall establish and maintain poultry living conditions that accommodate the health and natural behaviour of poultry as follows:

- a) The keeping of poultry in row, battery, enriched or colony cages, is prohibited;
- b) Layer flocks shall be limited to 10 000 birds. More than one flock may be in the same building if flocks are separated and have separate runs;
- c) Poultry shall be reared in open-range conditions and have free access to pasture, open-air runs, and other exercise areas, subject to weather and ground conditions. Outdoor areas shall:
  - 1) be free of prohibited substances for 36 months prior to their use;
  - 2) be covered with vegetation, seeded if necessary, and periodically left empty to allow vegetation to re-grow and to prevent disease build-up. To facilitate rodent control, a vegetation-free perimeter around poultry houses is permitted;
  - 3) provide protection from predators and be managed in a way that encourages use by the birds;
  - 4) show signs of use as appropriate for the season.
- d) In an emergency situation, when outdoor access results in an imminent threat to the health and welfare of poultry, access may be restricted. Outdoor access shall resume when the imminent threat ends. Producers shall document periods of confinement.
- e) Operators shall have an organic plan that describes outdoor access and how they will protect birds from disease and predators.
- f) Layers may be confined during onset of lay, that is, until peak production is reached. The laying flock shall have outdoor access for a minimum one-third of its laying life.
- g) Rearing facilities closely matched with the conditions that exist in the layer barn are recommended. Pullets, however, may be kept indoors until they are fully immunized.
- h) Barn-raised meat chickens shall have outdoor access on a daily basis by 25 days of age. Meat chickens raised outdoors in shelters without indoor access shall have access to pasture on a daily basis by four weeks of age, unless weather conditions endanger the health or safety of the birds. Turkeys shall have outdoors access by eight weeks of age.

**6.13.2** Ducks and geese shall have access to a water area created for their use, whenever weather conditions permit. Facility design shall address the need to prevent commingling of wild waterfowl and domestic poultry.

**6.13.3** Layers shall have access to an adequate number of nests, as recommended by best management practices.

**6.13.4** Perch area of at least 18 cm (7 in.)/hen shall be provided for layers. Perch area may include raised perches, nest rails and raised floors.

**6.13.5** Poultry barns shall have sufficient exits (popholes) to ensure that all birds have ready access to the outdoors.

**6.13.5.1** Exits shall:

- a) allow passage for more than one bird at a time, and be evenly distributed along the line of access to the outdoor range;
- b) shall correspond to the requirements shown in Table 3 for the number and size of exits:

**Table 3 Poultry barns minimum exit numbers and size**

Poultry	Combined width of popholes	Minimum width of each pophole	Minimum height	Minimum number
<b>Layers</b>	2 m (6.6 ft)/1000 hens	50 cm (20 in.)	35 cm (14 in.)	2
<b>Broilers</b>	1 m (3.3 ft)/1000 birds OR all birds within 15 m (49 ft) of an exit	50 cm (20 in.)	35 cm (14 in.)	2
<b>Turkeys</b>	2 m (6.6 ft)/1000 birds	150 cm (59 in.)	75 cm (30 in.)	2

**6.13.5.2** When existing organic poultry barns do not meet the requirements of 6.13.5.1 b), either the distance from an exit from anywhere in the barn shall be no more than 15 m (49 ft), or the operator shall provide evidence that birds utilize outdoor range. Evidence shall demonstrate that 25-50 % of birds are on range when there are no age or weather constraints.

**6.13.6** Litter shall be provided and kept dry. Houses with slatted floors shall have a minimum of 30% solid floor area with sufficient litter for dust bathing, scratching and foraging.

**6.13.7** Poultry shall have access to at least the number of waterers and feeders required by the relevant Code of Practice.

**6.13.8** Poultry housed indoors shall be provided with natural light either with evenly distributed windows or light permeable fabric. The total window area shall be no less than 1% of the total ground-floor area, unless it can be demonstrated that natural light levels are sufficient to read a document such as a newspaper anywhere in the barn. If day length is artificially prolonged, the total duration of light shall not exceed 16 h, and shall be terminated by gradual reduction of light intensity followed by 8 h of continuous darkness. The following exceptions are permitted and shall be documented:

- a) periods of increased lighting are permitted due to stage of production, for example, arrival of chicks and turkey poults;
- b) decreased lighting intensity is permitted due to animal welfare concerns, for example, outbreaks of cannibalism.

**6.13.9** The maximum indoor and outdoor densities are shown in Table 4.

**Table 4 Maximum indoor and outdoor densities for poultry**

Poultry	Indoors	Outdoor runs
<b>Layers</b>	6 birds/m <sup>2</sup> (10.76 ft <sup>2</sup> )	4 birds/m <sup>2</sup> (10.76 ft <sup>2</sup> )
<b>Pullets 0-8 weeks<sup>a</sup></b>	24 birds/m <sup>2</sup> (10.76 ft <sup>2</sup> )	16 birds/m <sup>2</sup> (10.76 ft <sup>2</sup> )
<b>Pullets 9-18 weeks<sup>a</sup></b>	15 birds/m <sup>2</sup> (10.76 ft <sup>2</sup> )	10 birds/m <sup>2</sup> (10.76 ft <sup>2</sup> )
<b>Broilers</b>	21 kg/m <sup>2</sup> (4.3 lb/ft <sup>2</sup> )	21 kg/m <sup>2</sup> (4.3 lb/ft <sup>2</sup> )
<b>Turkeys/large birds</b>	26 kg/m <sup>2</sup> (5.3 lb/ft <sup>2</sup> )	17 kg/m <sup>2</sup> (3.5 lb/ft <sup>2</sup> )

<sup>a</sup> Outdoor runs are not required when flocks are undergoing an immunization program.

**6.13.10** Multi-level aviary systems for layers shall have no more than three levels or tiers above ground level. Total floor space, for calculation of solid-floor area and bird density requirements, shall include all usable floor levels (see 6.13.6 and 6.13.9). If winter gardens are used to provide required scratching areas, they shall be accessible year-round.

**6.13.11** For pasture-based operations with mobile units, stocking density shall be no more than 2000 layers/ha (800 layers/ac.), 2500 broilers/ha (1000 broilers/ac.) or 1300 large birds (turkeys/geese)/ha (540 large birds/ac.), based on the total amount of land used for rotational poultry pasture. When birds are in moveable field shelters, the shelters shall be moved daily, whenever possible, and at least once every four days, taking into consideration the impact on the birds and on the land. Density within the moveable shelters shall correspond to the indoor densities described in 6.13.9.

**6.13.12** Buildings shall be emptied, cleaned and disinfected, between flocks, and runs shall be left empty to allow the vegetation to grow back.

**6.13.13** If major renovation of barns on existing operations is required in order to comply with 6.13.1 b), 6.13.5 and 6.13.8, operators are granted an extended period of three years from the date of publication of this standard to come into compliance, provided that a plan for the new construction or renovation is in place within 12 months after the publication of this standard.

#### **6.14 Additional requirements for rabbits**

**6.14.1** If required for comfort and security, rabbits may be temporarily confined, for example, overnight, in cages or hutches. Continuous confinement is prohibited.

**6.14.2** The use of mobile pasture pens is permitted, provided that pens do not restrict natural behaviour and they are moved at least once every three days.

**6.14.3** Rabbits shall have space to run, hop and dig, and to sit upright on their back legs with ears erect. The minimum indoor and outdoor space requirements are shown in Table 5.

**Table 5 Minimum indoor and outdoor space requirements for rabbits**

<b>Rabbits</b>	<b>Indoor space</b>	<b>Outdoor – runs and concrete exercise areas</b>	<b>Outdoor – pasture</b>	<b>Mobile pens</b>
<b>From weaning to slaughter</b>	0.3 m <sup>2</sup> (3.23 ft <sup>2</sup> )/ head	2 m <sup>2</sup> (22 ft <sup>2</sup> )/ head	5 m <sup>2</sup> (54 ft <sup>2</sup> )/ head	0.4 m <sup>2</sup> (4.3 ft <sup>2</sup> )/ head
<b>Pregnant does</b>	0.5 m <sup>2</sup> (5.4 ft <sup>2</sup> )/ head	2 m <sup>2</sup> (22 ft <sup>2</sup> )/ head	5 m <sup>2</sup> (54 ft <sup>2</sup> )/ head	0.5 m <sup>2</sup> (5.4 ft <sup>2</sup> )/ head
<b>Does and litters</b>	0.7 m <sup>2</sup> (7.5 ft <sup>2</sup> )	2 m <sup>2</sup> (22 ft <sup>2</sup> )	—	0.4 m <sup>2</sup> (4.3 ft <sup>2</sup> )/ head in shelter 2.4 m <sup>2</sup> (26 ft <sup>2</sup> ) for grazing area
<b>Bucks</b>	0.3 m <sup>2</sup> (3.23 ft <sup>2</sup> )/ head	2 m <sup>2</sup> (22 ft <sup>2</sup> )/ head	5 m <sup>2</sup> (54 ft <sup>2</sup> )/ head	0.4 m <sup>2</sup> (4.3 ft <sup>2</sup> )/ head

**6.14.4** Rabbits shall not be subjected to continuous lighting or kept in permanent darkness. During the day, rabbits shall be able to clearly see each other and their surroundings.

**6.14.5** Does about to give birth shall be given secluded individual burrows or nest boxes for kindling (birthing).

**6.14.6** The doe and litter shall have free access to outdoor range and foraging areas once the kits reach 21 days of age.

**6.14.7** Weaning before the kits are 30 days of age is prohibited. However, if the welfare of the doe or kits is compromised, earlier weaning is permitted.

## **6.15 Additional requirements for pigs and farm-raised wild boar**

**6.15.1** The number of animals on a production unit shall reflect the size of the available land-base, which comprises land owned, leased and available for spreading their manure, and based on a balance between animal units, feed production and manure management. Farrow to finish operators shall not exceed 2.5 sows/ha (1 sow/ac.).

**6.15.2** Pigs shall have access to outdoor exercise areas. Outdoor areas may include woodlands or other natural environments. Access to pasture is recommended but not mandatory. Pasture management guidelines apply to all outdoor areas (see 6.7.1 j).

**6.15.3** Sows and gilts shall be kept in groups, with the following exceptions:

- a) individual pens are permitted for the protection of females during estrus, or for other health reasons, for a period of up to five days;
- b) sows may be individually housed in a pen [7.5 m<sup>2</sup> (81 ft<sup>2</sup>)/sow with litter] for up to five days prior to farrowing and during the suckling period;
- c) if needed for piglet protection during the suckling period, sow restraint is permitted for a maximum of three days. Sows may be restrained for a shorter period to protect the operator during piglet processing or pen cleaning;
- d) the use of farrowing crates as a means of restraint is prohibited.

**6.15.4** Piglets shall not be weaned before four weeks of age. However, if the welfare of the sow and piglets is compromised, earlier weaning is permitted.

**6.15.5** Piglets shall not be kept on flat decks or in cages.

**6.15.6** If there is visual and tactile contact with other pigs, boars may be housed in individual enclosures.

**6.15.7** Indoor and outdoor exercise areas shall permit rooting.

**6.15.8** The use of nose rings is prohibited.

**6.15.9** The minimum indoor and outdoor space requirements are shown in Table 6.



Table 6 Minimum indoor and outdoor space requirements for pigs and boars

Pigs and boars	Indoor space	Outdoor runs and pens
Sow and piglets (up to 40 days old).	7.5 m <sup>2</sup> (81 ft <sup>2</sup> ) for each sow and litter	Not required
Growing pigs a) up to 30 kg (66 lb) b) 30–50 kg (66–110 lb) c) 50–85 kg (110–187 lb) d) >85 kg (187 lb)	0.6 m <sup>2</sup> (6.5 ft <sup>2</sup> )/ head 0.8 m <sup>2</sup> (8.6 ft <sup>2</sup> )/ head 1.1 m <sup>2</sup> (12 ft <sup>2</sup> )/ head 1.3 m <sup>2</sup> (14 ft <sup>2</sup> )/ head	0.4 m <sup>2</sup> (4.3 ft <sup>2</sup> )/ head 0.6 m <sup>2</sup> (6.5 ft <sup>2</sup> )/ head 0.8 m <sup>2</sup> (8.6 ft <sup>2</sup> )/ head 1.0 m <sup>2</sup> (10.76 ft <sup>2</sup> )/ head
Sows in group pens	3 m <sup>2</sup> (32.3 ft <sup>2</sup> )/ head	3 m <sup>2</sup> (32.3 ft <sup>2</sup> )/ head
Boars in individual pens	9 m <sup>2</sup> (97 ft <sup>2</sup> )/ head	9 m <sup>2</sup> (97 ft <sup>2</sup> )/ head

## 7 Specific production requirements

### 7.1 Apiculture

**7.1.1** Bees may be introduced to an operation and managed for production benefits, such as pollination of organic crops. If managed as a livestock species for the production of organic products (for example, honey, pollen, propolis, royal jelly, beeswax and bee venom), bees shall be managed in accordance with this standard.

**7.1.2** The operator shall prepare a detailed organic plan (see 4.1, 4.2 and 4.3) that describes the source of bees, production methods, bee diet, disease and pest control, breeding and other related issues of colony management. Where applicable, the organic plan shall also describe crop management practices.

**7.1.3** Records that document all apiary management activities, including removal of supers and extraction of honey (see 4.4), shall be maintained.

**7.1.4** The treatment and management of bee colonies shall be informed by the principles of organic production (see Introduction, section II).

**7.1.5** Organic plants and undomesticated, non-agricultural vegetation shall be the primary source of nectar, honeydew and pollen. Crops treated with prohibited substances and genetically engineered crops shall be avoided.

**7.1.6** Bee health shall be based on appropriate measures such as selection of stock with disease-resistant traits, availability of suitable forage, and good apiary management practices.

**7.1.7** When bees are placed in wild areas, impact on the indigenous insect population shall be considered.

#### 7.1.8 Transition

**7.1.8.1** Colonies shall be under continuous organic management for at least 12 months before products may be considered organic.

**7.1.8.2** During transition, all non-organic wax shall be replaced with organic wax. If prohibited substances were not used in the colony for at least 12 months prior to the start of continuous organic management, replacement of wax is not mandatory. However, all products produced prior to the start of continuous organic management shall be considered non-organic.

**7.1.8.3** Colonies and hives shall not be rotated between organic and non-organic management systems. Bees treated with antibiotics are subject to the requirements of 7.1.15.7.

#### **7.1.9 Introduced bees**

If commercially available, introduced bees, that is, replacement bees for established colonies, shall be organic. Replacement colonies shall be produced within the operation or come from another established organic apiary.

#### **7.1.10 Location of hives**

Where sources or zones of prohibited substances are present, that is, genetically engineered crops or environmental contamination, apiaries shall be protected with a buffer zone of 3 km (1.875 mi.). The following exceptions apply:

- a) fertilizers are permitted in the buffer zone, with the exception of sewage sludge; and
- b) if natural features that would restrict the likelihood of bee travel (such as forests, hills or waterways) and abundant organic forage are present, buffer zones may be reduced.

#### **7.1.11 Forage and feeding**

**7.1.11.1** Organic honey and pollen shall be the primary food source for adult bees. Adequate food supplies shall be maintained in the colony, including sufficient food reserves for the colony to survive dormancy periods.

- a) In the event of a feed shortage due to climatic or other exceptional circumstances, temporary feeding of colonies is permitted. However, feeding shall only occur between the last honey harvest and 15 days before the start of the next nectar or honeydew flow-period.
- b) Organic honey or sugar shall be used. When the health of the colony cannot be maintained with honey or sugar that is organic, non-organic, refined sugar may be used.

**7.1.11.2** Feed shall not be provided less than 30 days before the harvest of honey.

#### **7.1.12 Colony management**

**7.1.12.1** Hives shall be clearly and individually identified, and shall be monitored regularly, that is, at one- to two-week intervals, depending upon the colony, weather conditions and time of year.

**7.1.12.2** Wing clipping of queen bees is prohibited.

**7.1.12.3** Bees shall be removed from hives with bee escape-boards, shaking, brushing and forced-air blowers.

**7.1.12.4** Use of synthetic materials in bee smokers is prohibited (see 1.4).

**7.1.12.5** Annual destruction of bee colonies, following nectar flows, is prohibited.

#### **7.1.13 Hive construction**

**7.1.13.1** Hives shall be constructed of and maintained with natural materials, such as wood and metal. Pressure-treated lumber or particleboard, wood preservatives and lumber treated with prohibited substances are not permitted.

**7.1.13.2** Exterior surfaces of the hive shall be painted with non-lead-based paints.

**7.1.13.3** If dipped in organic beeswax, plastic foundation is permitted.

#### **7.1.14 Health care**

**7.1.14.1** Preventative health care practices shall be established and maintained, including the selection of bee stocks resistant to prevalent diseases and pests; the selection of colony locations considering site-specific conditions; the availability of sufficient pollen and honey; the renewal of beeswax; the regular cleaning and disinfection of equipment; and the destruction of contaminated hives and materials.

**7.1.14.2** The operator shall promote strong, healthy colonies. Management practices may include: merging weaker, albeit healthy, colonies; renewing queens, if necessary; maintaining adequate hive density; inspecting colonies systematically; and relocating diseased colonies to isolated areas.

#### **7.1.15 Disease and pest management**

**7.1.15.1** The operator shall be a knowledgeable beekeeper who is familiar with the life cycle and behaviour of bees, related disease-causing organisms, parasitic mites and other pests. In the presence of such pests, every effort shall be made to restore the health of a colony.

**7.1.15.2** Every effort shall be made to select and breed queen bees for diseases and parasite resistance.

**7.1.15.3** Comb foundation shall be obtained from beeswax within the operation or, if commercially available, from other organic sources.

**7.1.15.4** Pests and diseases shall be controlled with management methods or modified equipment.

**7.1.15.5** Botanical compounds may be introduced into the hive provided that such remedies are listed in Table 5.3 of CAN/CGSB-32.311, and are not used within 30 days of nectar flow or when honey supers are on the hive.

**7.1.15.6** Therapeutic applications of pest, parasite and disease control substances listed in Table 5.3 of CAN/CGSB-32.311 are permitted.

**7.1.15.7** Synthetic allopathic drugs (for example, antibiotics) are prohibited. However, where the imminent health of the colony is threatened, substances listed in Table 5.3 of CAN/CGSB-32.311 are permitted. Before treatment, hives shall be removed from the foraging area and taken out of organic production to prevent the spread of antibiotics within the apiary. Treated hives shall be placed in isolation and undergo a 12-month transition period. Wax shall be replaced with organic wax and all veterinary treatments shall be clearly documented.

**7.1.15.8** Destroying the male brood is only permitted to contain infestation with varroa mites.

#### **7.1.16 Extraction, processing and storage**

**7.1.16.1** Extraction of honey from a comb with live brood is prohibited.

**7.1.16.2** The quality and organic integrity of honey and other products of apiculture (see 7.1.1) shall be preserved and protected as specified in 8.1.

**7.1.16.3** Surfaces in direct contact with honey shall be constructed of food-grade materials or coated with beeswax.

**7.1.16.4** Heating of honey for extraction shall not exceed 35°C (95°F) and the decrystallization temperature shall not exceed 47°C (116.6°F). If organic honey is heated above those temperatures, then it can only be used as an ingredient in a multi-ingredient product.

**7.1.16.5** Gravitational settling shall be used to remove debris from extracted honey. Sieves are permitted for removal of residual debris.

**7.1.16.6** Honey shall be packaged in airtight containers.

**7.1.16.7** Facility cleaning, sanitation and pest management are subject to the requirements in 8.2 and 8.3.

## **7.2 Maple products**

**7.2.1** The standards for maple production also apply to syrup production in other tree types, such as birch.

**7.2.2** Organic maple products shall be from production units managed in accordance with this standard.

**7.2.3** In the production of maple syrup or products made from maple syrup, care shall be taken to ensure that the characteristic maple flavour predominates. This standard applies to all stages of production and preparation — the maintenance and development of the sugar bush, collecting and storing sap, converting sap to syrup, making products out of syrup, washing and sterilizing equipment, and storing finished products.

**7.2.4** The production of maple syrup shall be characterized by good management practices of the sugar bush and its ecosystem. Development and maintenance shall focus, over the long term, on preservation of the sugar bush ecosystem and improvement of tree vigour.

**7.2.5** Tapping practices shall minimize risk to the health and longevity of the trees.

**7.2.6** Equipment and techniques used to collect and store sap shall lead to a prepared product of the highest possible quality. Equipment shall be in good condition and shall be used according to the manufacturer's instructions.

**7.2.7** During conversion of sap to syrup, the sap can take on the odour of anything it comes into contact with. Therefore, care shall be taken to avoid denaturing the product during preparation. The use of technology that is likely to alter the intrinsic qualities of the product is prohibited.

### **7.2.8 Transition**

This standard shall be fully applied on a production unit for at least 12 months before the harvest of sap may be considered organic. Prohibited substances, such as fertilizers or synthetic pesticides used in forest management, shall not have been used for at least 36 months preceding the first harvest. Parallel production is prohibited.

**NOTE** The Canadian *Organic Products Regulations* require operators to document that they have not used prohibited substances. The Regulations also require that, in the case of an initial application for an organic certification of maple products, the application must be filed 15 months before the day on which the product is expected to be marketed. During that period of time, compliance with this standard will be assessed by the certification body and this assessment must include at least one inspection of the production unit, during production, in the year before maple products may be eligible for certification and one inspection, during production, in the year maple products are eligible for certification.

### **7.2.9 Sugar bush development and maintenance**

#### **7.2.9.1 Plant diversity**

The operator shall encourage species diversity in the sugar bush, in particular, companion species to the sugar maple. Companion species should represent a minimum of 15% of the volume of wood within the sugar bush. If companion species represent less than 15%, their growth shall be encouraged. Systematic clearing of undergrowth and brush is prohibited, even if growth is abundant. However, vegetation may be removed to clear paths and to facilitate movement.

### 7.2.9.2 Thinning

When it is necessary or when required by the forest administrator, thinning of the sugar bush shall be performed according to current good management practices, both public and private, and shall be evenly distributed throughout the sugar bush.

### 7.2.9.3 Tree protection

If livestock (for example, beef or dairy cattle, pigs or domestic deer) could harm sugar trees, access to the bush is prohibited in order to preserve plant diversity and the growth of young trees. Pipeline networks shall be installed so as not to wound or harm the growth of trees.

### 7.2.9.4 Fertilization

Fertility recommendations and applications shall be based on observed, diagnosed and documented deficiencies. Soil amendments permitted for maple production include wood ash, agricultural lime and non-synthetic fertilizers listed in Table 4.2 of CAN/CGSB-32.311.

### 7.2.9.5 Pest control

Knowledge and understanding of sugar bush and preparation facility pests, their habits, and solutions that maintain the bush ecosystem, are the preferred basis for pest control. Within the sugar bush, substances listed in Table 4.3 of CAN/CGSB-32.311, are permitted for disease and insect control. Within preparation facilities, mechanical and sticky traps are permitted for rodents and other destructive pests, as are natural repellents listed in Table 8.2 of CAN/CGSB-32.311. If an infestation occurs, pests may be hunted. Poisons of any kind are prohibited.

## 7.2.10 Tapping

### 7.2.10.1 Tree diameter and number of taps

Table 7 indicates the maximum number of taps a healthy maple can support, based on its chest height diameter (CHD); CHD is the diameter measured at a height of 1.3 m (4.3 ft) above the soil surface. A tree shall not have more than three tap holes.

**Table 7 — Maximum number of taps per healthy maple tree**

<b>Diameter measured at a height of 1.3 m (4.3 ft) above the soil surface</b>	<b>Maximum number of taps</b>
Less than 20 cm (8 in.)	0
20 to 40 cm (8 to 16 in.)	1
40 to 60 cm (16 to 23.6 in.)	2
60 cm (23.6 in.) or greater	3

### 7.2.10.2 Depth and diameter of tap holes

Depth of tap holes shall be no more than 4 cm (1.6 in.), not counting the bark, or 6 cm (2.4 in.), if the measurement is made from the surface of the bark. Diameters shall not be greater than 11 mm (0.4375 in.). If a tree is diseased, infested with pests, decaying or tap holes are not healing properly, stricter standards shall be implemented: the number of taps per tree shall be reduced to 2 where 7.2.10.1 allows 3, and 1 where 2 are allowed. When the chest height diameter is less than 25 cm (~9 7/8 in.), tapping is prohibited. If a majority of trees are affected, regular tapping standards apply. However, spouts with a smaller diameter shall be used on trees, in the affected area, shall not be tapped.

### **7.2.10.3 Disinfection of tap holes and tapping equipment**

The use of germicide, including paraformaldehyde tablets or denatured alcohol (a mixture of ethanol and ethyl acetate), in tap holes and on tapping equipment is prohibited. Food-grade ethyl alcohol may be sprinkled onto spouts and drill bits during tapping.

### **7.2.10.4 Over-tapping, renewing the tap and removal of spouts**

The practice of retapping a previously tapped tree during the same season or double tapping is prohibited. Renewing the same hole is allowed if the diameter is not changed. To allow trees to heal, spouts shall be removed no later than 60 days after the final, seasonal sap flow. Maple trees shall only be tapped during the sugar bush operation period (maple syrup season).

## **7.2.11 Collection and storage of maple syrup**

### **7.2.11.1 Spouts**

Spouts shall be made of food-grade materials.

### **7.2.11.2 Vacuum collection system**

All parts of the collection system that may come in contact with sap shall be made of materials suitable for use in the manufacture of food products. Pumps shall be well-maintained and used oil shall be collected and disposed of so as to not contaminate the environment.

### **7.2.11.3 Storage**

All equipment that may come into contact with sap or its concentrate and filtrates, such as storage tanks, connections and transfer systems, shall be made of materials suitable for use in the manufacture of food products. This also applies to any surface coatings, such as paints. For new installations or replacement purposes, stainless steel storage tanks with tin-lead soldered joints are prohibited.

### **7.2.11.4 Collecting with buckets**

Pails or buckets may be made of aluminum or plastic. Galvanized steel is prohibited. Buckets shall be covered with a lid. The standards that apply to storage tanks also apply to reservoirs used to transport collected sap.

## **7.2.12 Conversion of sap to syrup**

### **7.2.12.1 Sap filtration**

Sap shall be filtered before processing. The filtration shall not compromise the sap's inherent qualities.

### **7.2.12.2 Sap sterilization**

Sterilization of sap with ultraviolet radiation or by adding a sterilizer prior to conversion is prohibited.

### **7.2.12.3 Osmosis extraction and membranes**

Sap may be concentrated via reverse osmosis. Only reverse osmosis and nano-filtration (ultra-osmosis) membranes are allowed. In the off-season, osmosis membranes shall be stored, in filtrate, in a hermetically sealed container and kept in a frost-free location. Sodium metabisulfite (SMBS) may be added to the filtrate to prevent mould growth. If SMBS is used, the membrane shall be rinsed before next use with a volume of water equal to the hourly capacity of the membrane [for example, 2728 L (600 gal.) of water for a 2728 L/h (600 gal./h) membrane]. Off-site storage of the membrane (for example, by the membrane supplier) shall be documented.

#### 7.2.12.4 Evaporator

Evaporator pans shall be made of stainless steel. They shall be tungsten-inert gas (TIG) welded or soldered with tin-silver solder. Pans made of galvanized steel, copper, aluminum or tin-plated steel are prohibited. Permitted fuels include wood and heating oil. Used oils may be used as a primary or supplementary fuel. Air and environmental quality shall be controlled in the evaporator room. Air injection systems are prohibited.

NOTE In Canada, additional provincial requirements may apply to the use of used oils.

#### 7.2.12.5 Defoamers

Pennsylvania maple wood (*Acer pennsylvanicum*, also known as striped maple or moosewood) and organic vegetable oils, except those with allergenic potential, are the only permitted antifoaming agents.

#### 7.2.12.6 Syrup filtration and other treatments

Organic maple syrup shall not be refined by artificial means, bleached or lightened in colour. Simple filtration via the following methods is permitted: through cloth or paper, a filter press or food-grade diatomaceous earth, or use of silica powder or clay dust with a filter press to remove suspended solids.

#### 7.2.13 Cleaning of equipment for use in syrup production

##### 7.2.13.1 Maple sap collection systems, tubing and tanks

Cleaning shall take place before or after each production season. Permitted sanitation substances include:

- a) in-season: for all equipment except tubing, sodium hypochlorite followed by a potable water or filtrate rinse;
- b) off-season: for all equipment, sodium hypochlorite or fermented sap followed by a potable water, filtrate or sap rinse, isopropyl alcohol (for tubing only). Other substances are prohibited, including those with a phosphoric acid base.

##### 7.2.13.2 Osmosis extraction and membranes

Reverse osmosis units and membranes shall first be cleaned using filtrate, according to the time and temperature recommended by the manufacturer.

- a) Cleaning during the production season:
  - 1) If a Pure Water Permeability (PWP) test indicates that controlled efficiency is less than 85% of the controlled efficiency recorded at the beginning of the season, a caustic soda-based soap (NaOH) recommended by the manufacturer for membrane cleaning is permitted.
  - 2) If PWP test results stay below 75% of the efficiency recorded at the beginning of the season after the use of a NaOH-based soap, citric acid is permitted.
  - 3) Cleaning or a cleaning sequence with substances permitted in 1) and 2), shall be followed by a rinse with clean filtrate or potable water. The rinse volume shall be greater than or equal to 40 times the dead (residual) volume of the unit (total volume of the unit and its components after it is drained).
  - 4) Daily efficiency readings and calculations shall be recorded. Membrane flush water shall be disposed of in a manner that does not harm the environment.
- b) Cleaning after the production season: Off-season treatment of membranes with citric acid is permitted. Following the citric acid treatment, the use of acetic acid, peracetic acid, and hydrogen peroxide is permitted.



### **7.2.13.3 Evaporators**

Evaporators may be cleaned with potable water or filtrate at any time. Vinegar or fermented sap may be used at the end of the season.

### **7.2.13.4 Prohibited substances**

Substances other than those specified in 7.2.13.1, 7.2.13.2 and 7.2.13.3 are prohibited, including those with phosphoric acid content.

### **7.2.14 Food additives and processing aids**

Transformation of syrup into maple products (for example, maple butter, sugar and taffy) shall comply with this standard. Boiling with microwaves is prohibited. No other substances shall be added to syrup or maple products during production or preparation, whether to improve the taste, texture or appearance. Cones may be used if they constitute less than 5% of the weight of the final product.

### **7.2.15 Transport, storage and conservation**

Maple syrup not intended for immediate consumption shall be stored in food-grade containers that do not alter the chemical composition or quality of the syrup. Permitted containers include barrels made of stainless steel, fibreglass, food-grade plastic or metal with an interior food-grade coating. Reusing single-use barrels is prohibited. Barrels shall carry a unique identification number that is used in all related records. The barrel fill-date shall be recorded.

## **7.3 Mushroom production**

All relevant subclauses in this standard apply to mushroom production where this subclause has no specific requirements, including 5.1.2, 5.1.6, and 5.1.7. For outdoor production, 5.2.2 also applies.

### **7.3.1 Production sites and structures**

For organic mushrooms or mushroom products, the operator shall manage production units in a manner that ensures substrates and mushrooms do not come into contact with prohibited substances. Substrates shall be produced in accordance with this standard and applicable entries in Table 4.2 of CAN/CGSB-32.311 such as *Composting feedstocks* and *Compost produced on the production unit*:

- a) For indoor facilities, organic mushrooms shall not come into contact with prohibited substances that would compromise the integrity of the crop.
- b) For mushrooms grown in soil, prohibited substances shall not have been used for at least 36 months before the harvest of an organic crop.
- c) For new installations or replacement purposes, lumber treated with prohibited substances shall not be used in structures, containers or other surfaces that come into contact with growth substrate or mushrooms.

### **7.3.2 Substrates and growth media**

#### **7.3.2.1 Wood substrates**

Logs, sawdust or other wood-based materials used as substrates shall come from wood, trees or logs that have not been treated with prohibited substances.



### 7.3.2.2 Manure

Subclause 5.5.1 applies to manure used in growth substrates (including any non-organic agricultural substances in the manure). Manure shall be composted according to the requirements for soil amendments outlined in Table 4.2 of CAN/CGSB-32.311.

### 7.3.2.3 Other agricultural substances

If they are not composted, agricultural substances such as straw, hay or grains used as growth substrate shall be from organic sources. If organic sources are not commercially available, non-organic sources may be used, provided that they are composted according to the requirements for soil amendments outlined in Table 4.2 of CAN/CGSB-32.311.

### 7.3.3 Spawn

Organic spawn (seed) shall be used. Spawn grown or treated with substances listed in Table 4.3 of CAN/CGSB-32.311 may be used if organic spawn is not:

- a) available from within the production unit;
- b) commercially available.

### 7.3.4 Crop pest control and sanitation

Preventative disease control measures shall include the following:

- a) removal of diseased materials. Diseased mushroom strains shall be burned, moved at least 50 m (164 ft) from a production site (if, for example, the diseased logs are kept for research), or disposed of as recommended by good management practices;
- b) sanitation with substances listed in Table 4.3 of CAN/CGSB-32.311;
- c) cultivation sites that are free of debris from understory and diseased trees;
- d) cleaning and maintenance of equipment with sanitizers and disinfectants listed in Table 4.3 of CAN/CGSB-32.311.

### 7.3.5 Mushroom product preparation

Wherever organic product preparation takes place, 8.1 and 8.2 apply.

### 7.3.6 Facility pest management

Subclause 8.3 applies to pest management practices in and around mushroom facilities.

## 7.4 Sprouts, shoots and micro-greens production

Subclause 7.4 applies to crops that are generally harvested within 30 days of imbibition, either with roots attached (sprouts) or cut from the roots (shoots and micro-greens).

### 7.4.1 Sprouts, shoots and micro-greens produced in water

7.4.1.1 Organic seed shall be used.

7.4.1.2 Water sources (for example, potable water, distilled or processed by osmosis) shall meet or exceed drinking water guidelines for quality, including microbial and chemical contaminant levels.

**7.4.1.3** A water quality monitoring program shall be in place and water shall be analyzed at least twice a year (once every six months).

**7.4.1.4** Fertilizers are prohibited at all stages of growing and harvesting.

**7.4.1.5** Substances used for cleaning or sanitation of seed or harvested product shall be limited to substances listed in Table 4.3 of CAN/CGSB-32.311.

#### **7.4.2 Shoots and micro-greens produced in soil**

**7.4.2.1** Subclauses 7.4.1.1, 7.4.1.2, 7.4.1.3 and 7.4.1.5 also apply to shoots and micro-greens produced in soil.

**7.4.2.2** Subclause 7.5 applies to shoots and micro-greens produced in soil, whether they are grown in a growth chamber, greenhouse or other sheltered structure, or outdoors.

#### **7.4.3 Shoots and micro-greens product preparation**

Wherever organic product preparation takes place, 8.1 and 8.2 apply.

#### **7.4.4 Facility pest management**

Subclause 8.3 applies to pest management practices in and around facilities.

### **7.5 Greenhouse crops**

**7.5.1** In a permanent, in-ground soil system, prohibited substances shall not have been used for at least 36 months before the harvest of an organic crop.

**7.5.2** In a container system, soil shall be free of prohibited substances.

**NOTE** The Canadian *Organic Products Regulations* require operators to document that they have not used prohibited substances. The Regulations also require that, in the case of an initial application for organic certification of crops grown in greenhouses with a permanent, in-ground soil system, the application for certification must be filed 15 months before the day on which the product is expected to be marketed. During that period of time, compliance with this standard will be assessed by the certification body and this assessment must include at least one inspection of the production unit, during production, in the year before crops may be eligible for certification and one inspection, during production, in the year crops are eligible for certification. This requirement does not apply to greenhouses built on land that is part of an existing organic operation.

**7.5.3** Hydroponic and aeroponic productions are prohibited.

**7.5.4** Soil used in a container system, with the exception of transplants, shall provide nutrients to plants continuously. The soil (growth media) shall contain a mineral fraction (sand, silt or clay) and an organic fraction; it shall support life and ecosystem diversity.

**7.5.5** The following conditions apply to containerized, staked crops (for example, tomatoes, sweet peppers, cucumbers, eggplant):

- a) at the start of production, the total volume of soil shall consist of at least 10% compost;
- b) compost shall be included in the fertility program;
- c) containers shall be at least 30 cm (12 in.) high; and
- d) the soil volume shall be at least 70 L/m<sup>2</sup> (15.4 gal./10.8 ft<sup>2</sup>), based on the total growing area.

**7.5.6** Supplemental heat, with proper exhaust of burnt gasses, and supplemental lighting, are permitted. Supplemental nutrition with substances listed in Table 4.2 of CAN/CGSB-32.311, is permitted.

**7.5.7** Plants and soil, including potting soil, shall not come into contact with prohibited substances, including wood treated with prohibited substances.

**7.5.8** For crop production, the operator shall:

- a) use reusable and recyclable pots and flats whenever possible;
- b) use substances listed in Tables 4.2 and 4.3 of CAN/CGSB-32.311;
- c) use appropriate equipment cleaners, disinfectants and sanitizers listed in Tables 7.3 and 7.4 of CAN/CGSB-32.311.

**7.5.9** Full-spectrum lighting is permitted.

**7.5.10** The following procedures, processes or substances are permitted to:

- a) enrich carbon dioxide levels:
  - 1) flaming;
  - 2) fermentation;
  - 3) composting; and
  - 4) compressed gas (CO<sub>2</sub>);
- b) clean and disinfect plant containers, pots and flats:
  - 1) substances listed in Tables 7.3 or 7.4 of CAN/CGSB-32.311; and
  - 2) steam-heat sterilization;
- c) stimulate growth or development:
  - 1) substances listed in Tables 4.2 or 4.3 of CAN/CGSB-32.311; and
  - 2) control of daily temperature and light levels;
- d) prevent damping-off:
  - 1) low-temperature baking;
  - 2) hot-water treatment; and
  - 3) steam treatment.

**7.5.11** The following procedures or substances are permitted for the prevention and control of disease, insects or other pests:

- a) substances listed in Table 4.3 of CAN/CGSB-32.311;
- b) pruning;

- c) rouging;
- d) vacuuming;
- e) pest exclusion from greenhouses with air filters, screens or other physical devices; and
- f) biological control methods.

**7.5.12** Soil regeneration and recycling procedures shall be practiced. The following alternatives to crop rotation are permitted: grafting of plants onto disease-resistant rootstock, freezing the soil in winter, regeneration by incorporating biodegradable plant mulch (for example, straw or hay), and partial or complete replacement of greenhouse soil or container soil, provided it is re-used outside the greenhouse for another crop.

#### **7.5.13 Greenhouse crop product preparation**

Wherever organic product preparation takes place, 8.1 and 8.2 apply.

#### **7.5.14 Facility pest management**

Subclause 8.3 applies to pest management practices in and around crop facilities.

### **7.6 Wild crops**

**7.6.1** An organic wild plant product shall be harvested from a clearly defined area or production unit. Documented evidence that prohibited substances have not been used for at least 36 months before the harvest of an organic crop shall be available.

**7.6.2** The operator shall prepare an organic plan (see 4.1, 4.2 and 4.3) that includes:

- a) a detailed description of production areas and harvest methods;
- b) management practices that preserve wild species and avoid disturbance of the environment; and
- c) a record keeping system that meets the requirements of 4.4.

**7.6.3** Wild products shall be considered organic on the condition that they are harvested in relatively undisturbed or stable natural settings. A wild plant shall be harvested or picked in a manner that promotes growth and production, and does not damage the environment.

**7.6.4** The production zone for wild crops shall be isolated from contact with prohibited substances by a clearly defined buffer (see 5.2.2). Harvest sites shall be located more than one kilometre (0.62 mi) from potential sources of environmental contamination, such as golf courses, dumps, sanitary landfill sites and industrial complexes.

#### **7.6.5 Wild crop product preparation**

Wherever organic product preparation takes place, 8.1 and 8.2 apply.

#### **7.6.6 Facility pest management**

Subclause 8.3 applies to pest management practices in and around crop facilities.

### **7.7 Organic insects**

All the relevant elements of clauses 1-6 in this standard shall apply.

## 8 Maintaining organic integrity during cleaning, preparation and transportation

Clause 8 applies to all operations that handle, store and transport organic products for production and processing. During these activities, a central objective is to maintain the inherent organic qualities of the product through strict adherence to the procedures and principles of this standard. Operators are responsible for maintaining organic integrity at all points of the market supply chain, from production through point of sale to the final consumer.

### 8.1 Maintaining integrity

**8.1.1** Preparation materials, such as counters, containers and conveyors, in contact with food shall be clean and of food-grade quality.

**8.1.2** Incidental additives shall not compromise organic integrity:

- a) hand sanitizer substances, if used in direct contact with organic products, shall be listed in Table 7.3 of CAN/CGSB-32.311.
- b) culinary steam, that is, steam used in direct contact with organic products or packaging, shall only contain:
  - 1) substances listed in Tables 6.3-6.5 of CAN/CGSB-32.311; and/or
  - 2) food-grade cleaners, disinfectants and sanitizers authorized for organic product contact in Table 7.3 of CAN/CGSB-32.311.
- c) food-contact lubricants shall be listed in Tables 6.3-6.5 of CAN/CGSB-32.311.
- d) use of cleaners, disinfectants and sanitizers shall comply with the requirements in 8.2 of this standard.

**8.1.3** Mechanical, physical or biological processes (such as fermentation and smoking) are permitted.

**8.1.4** To prevent commingling, organic products shall be segregated or otherwise protected from non-organic products at all times, for example, during processing, storage, at bulk and unbound stages.

**8.1.5** If a production unit prepares both organic and non-organic products:

- a) organic and non-organic products shall not be mixed at any stage of preparation;
- b) every measure shall be taken to ensure that the organic and non-organic identity of finished product is maintained;
- c) operators shall document removal events used to prevent cross-contamination of organic and non-organic production runs;
- d) preparation of organic products shall be carried out continuously until the run is complete;
- e) organic runs shall be separated by place or time from similar preparation of non-organic products;
- f) organic runs shall be planned in advance to prevent commingling; and
- g) additional measures are required to prevent accidental commingling of bulk at-risk organic seed or grain with non-organic grain which may contain trace GE contamination:
  - 1) Storage bins containing organic crops shall be visibly identified as organic using well-maintained, weather-resistant signage.

- 2) When at-risk organic crops are being moved between bulk storage bins (for example, grain drying, lot mixing), temporary signage shall be attached to the wagon or truck to visibly identify the load in transit as organic.
- 3) When organic crops are held in bulk bins for drying or roasting, temporary signage shall be attached to the bin to visibly identify the contents as organic.

**8.1.6 Organic product packaging shall**

- a) maintain organic product quality and integrity; and
- b) be minimal in a manner that is consistent with 8.1.6 a). Packaging materials that minimize harm to the environment throughout their life cycle are preferred; and
- c) comply with prohibitions in 1.4 a), b), and k).

**8.2 Cleaning, disinfecting and sanitizing**

**8.2.1** Food-grade cleaners, disinfectants and/or sanitizers listed in Table 7.3 of CAN/CGSB-32.311 may be used as annotated:

- a) on organic product contact surfaces, which include equipment, storage and transport units; and/or
- b) in direct contact with organic products.

**8.2.2** If substances in Table 7.3 are ineffective, cleaners, disinfectants and/or sanitizers listed in Table 7.4 of CAN/CGSB-32.311 may be used on organic product contact surfaces, provided that documentation demonstrates:

- a) they are used as annotated; and
- b) removal event(s) have eliminated the substance(s) from organic product contact surfaces prior to organic production.

**8.2.3** If substances in Table 7.4 are ineffective, other cleaners, disinfectants and/or sanitizers may be used on organic product contact surfaces, provided that documentation demonstrates:

- a) the efficacy of the alternative substance(s); and
- b) removal event(s) have eliminated the alternative substance(s) from organic product contact surfaces prior to organic production; and
- c) that effluent discharge was neutralized to minimize negative impact on the environment.

**8.2.4** Specific cleaning, sanitation and disinfection requirements in clause 7 of this standard supersede those specified in 8.2.

**8.3 Facility pest management and post-harvest management**

**8.3.1** Good production and manufacturing practices shall be adopted to prevent pests. Pest management practices shall involve the following, in descending order:

- a) the removal of pest habitat and food;

- b) the prevention of access and environmental management (for example, light, temperature and atmosphere), to prevent pest intrusion and reproduction;
- c) mechanical and physical methods, such as traps;
- d) lures and repellents, as listed in Table 8.2 of CAN/CGSB-32.311.

**8.3.2** If the practices enumerated in 8.3.1 are ineffective, the operator may use pest control substances listed in Tables 8.2 and 8.3 of CAN/CGSB-32.311. The operator shall record the target pests, substances used, start and end dates, and the location(s) of pest control devices.

**8.3.3** If the practices specified in 8.3.2 are ineffective, substances not listed in Table 8.2 of CAN/CGSB-32.311 may be used whenever organic product preparation takes place, including off-site storage facilities, provided that there is no risk to organic product status or integrity. Operators shall ensure that organic products and/or the packaging materials are not present when these substances are used indoors. Operators shall clearly document:

- a) why permitted substances were not suitable or ineffective for pest management;
- b) how contact of organic products with unlisted substances was avoided;
- c) all activities involved in the use, storage and disposal of unlisted substances.

**8.3.4** If pest and disease control substances that are not listed in Table 8.2 of CAN/CGSB-32.311 are used under any mandatory government program, operators shall monitor and document their use.

**8.3.5** Substances in Table 8.3 of CAN/CGSB-32.311 may be used for post-harvest storage.

**NOTE** In the event of emergency pest or disease treatment, Canadian operators are required to notify their certification body immediately of any change that may affect organic product certification.

## **8.4 Transportation**

**8.4.1** Every measure shall be taken to ensure that the integrity of organic inputs, ingredients and products is not compromised in transit. Physical segregation or other protection methods shall be used to avoid commingling or substitution with non-organic inputs, ingredients and products.

**8.4.2** The following information shall accompany organic product:

- a) the name and address of the person or organization responsible for the production, preparation or distribution of the product;
- b) the name of the product;
- c) the organic status of the product; and
- d) information that ensures traceability, for example, the lot number.

**8.4.3** Organic products shall not be exposed to pesticides or pest control substances that are not listed in Table 8.2 of CAN/CGSB-32.311 during any stage of transit or at border crossings.

**NOTE** Owners are responsible for the organic integrity of organic product while it is in transit. This includes the use of common carriers and custom hauling. Transport companies share responsibility for organic integrity while loading, transporting, or off-loading certified organic product.

## 9 Organic product composition

Clause 9 applies to all operations involved in organic product preparation and resale, including retailers who prepare the product.

### 9.1 Product composition

**9.1.1** Organic product formulations shall consist primarily of organic whole or processed agricultural ingredients and organic processing aids. Other permitted ingredients and processing aids, as described in 9.2, shall be kept to a minimum.

**9.1.2** Evaluation and calculation of organic percentages shall account for all constituent ingredients or ingredient sub-parts, distinguishing between organic and non-organic components of each ingredient contained in the product.

**9.1.3** The percentage of all organic ingredients in an organic product shall be calculated as follows:

- a) Solid products (except livestock feed) — Divide the net mass, excluding water and salt, of all organic ingredients in the formulation or finished product, whichever is more relevant, by the net mass, excluding water and salt, of all ingredients.
- b) Liquid products — If the product and its ingredients are liquid, divide the fluid volume of all organic ingredients, excluding water and salt, by the fluid volume of all ingredients, excluding water and salt. If the principal display panel uses phrases like “reconstituted from concentrates” to describe the product, single-strength concentrations of the ingredients or the finished product shall be used to calculate organic percentages.
- c) Solid products and liquid products — Divide the combined net mass of solid organic ingredients and the net mass of liquid organic ingredients, excluding water and salt, by the total mass, excluding water and salt, of all ingredients in the finished product.
- d) Livestock feed shall contain 100% organic agricultural ingredients and necessary feed additives or supplements listed in Table 5.2 of CAN/CGSB-32.311. Divide the total net mass, excluding water, salt and calcium compounds, of combined organic ingredients in the formulation or the finished product, whichever is more relevant, by the total mass, excluding water, and salt and calcium compounds, of all ingredients.

**9.1.4** The percentage of all organic ingredients in an organic product shall be rounded down to the nearest whole number.

### 9.2 Categorization of organic products

Based on the percentage of their organic ingredients, organic products fall into two categories:

#### 9.2.1 95% organic content (or more)

Such products may not contain an ingredient in both organic and non-organic form.

Such products may contain up to 5% of the following:

- a) “ingredients classified as food additives”, and “ingredients not classified as food additives,” as listed in Tables 6.3 and 6.4 of CAN/CGSB-32.311, respectively, subject to requirements specified in substance listing annotations and restrictions specified in 6.2 of CAN/CGSB-32.311. Listed ingredients of agricultural origin shall meet the requirements in 1.4 a), 1.4 c), 1.4 h) and 6.2 of CAN/CGSB-32.311;
- b) non-organic agricultural processing aids that meet the requirements in 1.4 a), 1.4 b), 1.4 c), and 1.4 h), and any annotations listed in Table 6.5 of CAN/CGSB-32.311;



- c) non-agricultural processing aids as listed in Table 6.5 of CAN/CGSB-32.311, subject to the requirements specified in substance listing annotations;
- d) non-organic agricultural ingredients that meet the requirements in 1.4 a), 1.4 c) and 1.4 h). These ingredients are also subject to organic commercial availability requirements.

### 9.2.2 70-95% organic content

Such products may not contain an ingredient in both its organic and non-organic form.

Such products may contain up to 30% of the following :

- a) non-organic agricultural ingredient subject to the requirements in 1.4 a), 1.4 c), and 1.4 h);
- b) “ingredients classified as food additives”, and “ingredients not classified as food additives,” as listed in Tables 6.3 and 6.4 of CAN/CGSB-32.311, respectively, subject to the requirements specified in substance listing annotations and restrictions specified in 6.2 of CAN/CGSB-32.311. Listed ingredients of agricultural origin shall meet the requirements in 1.4 a), 1.4 c), 1.4 h) and 6.2 of CAN/CGSB-32.311;
- c) non-organic agricultural processing aids that meet the requirements in 1.4 a), 1.4 b), 1.4 c), and 1.4 h), and any annotations listed in Table 6.5 of CAN/CGSB-32.311;
- d) non-agricultural processing aids listed in Table 6.5 of CAN/CGSB-32.311 subject to the requirements specified in substance listing annotations.

NOTE See Annex A for a summary of clause 9.

## 10 Procedures, criteria and conditions to amend CAN/CGSB-32.311 *Organic production systems – Permitted substances lists*

Clause 10 applies to all proposed amendments to the Permitted Substances Lists (PSL). Only generic substances are listed in the PSL. Brand name substances, which may be a combination of generic substances, are not eligible for inclusion on the PSL. This clause does not apply to packaging materials, equipment surfaces, or other similar substances or materials.

### 10.1 Substance review procedures

**10.1.1** Criteria provided in this clause shall be the determinants for amending CAN/CGSB-32.311.

**10.1.2** The substance review process shall be open, transparent and fully participatory according to the Canadian General Standards Board (CGSB) procedures.

**10.1.3** Consideration shall be given to the consequences a proposed amendment may have on equivalency and harmonization of this standard with standards and regulations of other jurisdictions.

### 10.2 Permitted substances criteria

**10.2.1** Substances included in the Permitted Substances Lists shall:

- a) comply with the general principles of organic production specified in section II of the Introduction of this standard, and
- b) comply with the prohibitions set out in 1.4.

**10.2.2** Substance reviews shall:

- a) consider the necessity, origin and mode of production, and the social and ecological impact of the production and application of the substance;
- b) include a detailed description of the substance and a substantive rationale along with documentation in support of the proposed amendment; and
- c) include an evaluation of all available alternatives, including substances and acceptable practices outlined in this standard, and in other production systems.

**10.2.3** If applicable, the substance annotation shall include:

- a) restrictions concerning its origin and mode of production;
- b) restrictions concerning its composition and usage; and
- c) a commercial availability clause which allows for the use of a synthetic equivalent when the non-synthetic form of the substance is not available in sufficient quality or quantity, at the time of publication.

**10.2.4** Exceptions to 10.2:

- a) if a substance review confirms that a non-synthetic form of the substance is not available, a synthetic version may be approved as an exception.
- b) if alternatives to synthetic substances are anticipated, the synthetic version may be permitted as a temporary exception. The temporary exception shall be noted in the annotation.
- c) temporary exceptions shall be re-evaluated at each full review of the standards.

**10.3 Specific substance review criteria**

The criteria used for guiding the review of a substance are described in Tables 8, 9, 10 and 11.

**Table 8 Substance review criteria for permitted substances in crop production**

	<b>Soil amendments and crop nutrition (Table 4.2 of CAN/CGSB-32.311)</b>	<b>Crop production aids and materials (Table 4.3 of CAN/CGSB-32.311)</b>
<b>A. Necessity</b>	Shall be necessary to improve or maintain soil fertility, to fulfil specific requirements of crops, and/or for specific soil conditioning and rotational purposes that cannot be satisfied by the requirements and practices of this standard.	Shall be necessary to manage plant diseases, insects, weeds and other pests. Used when no other adequate biological, physical or plant breeding alternatives or effective management practices are available.
<b>B. Origin and mode of production</b>	1. Shall be of plant, animal, microbial or mineral origin. Substances may be produced through physical (for example, mechanical or thermal), enzymatic or microbial (for example, composting, fermentation or digestion) methods of transformation.  2. Shall be derived from crops and livestock produced in accordance with this standard, or from naturally occurring minerals.  3. Shall be non-synthetic. If non-synthetic forms of these substances do not exist, synthetic substances may be considered for inclusion.	

	<b>Soil amendments and crop nutrition (Table 4.2 of CAN/CGSB-32.311)</b>	<b>Crop production aids and materials (Table 4.3 of CAN/CGSB-32.311)</b>
<b>C. Impact</b>	<p>Substance reviews shall consider:</p> <ol style="list-style-type: none"> <li>1. The impact of a substance's manufacture and disposal after use on the environment including impacts on ecology, surface and ground water, and soil and air quality, including substance persistence, degradation and concentration effects.</li> <li>2. The impact of a substance's use or potential misuse on soil quality (including biological diversity and activity, structure, salinity, sodicity, erodability and tilth), surface and ground water quality, ecosystems (in particular, non-target organisms) including wildlife and wildlife habitat, and animal and human health.</li> </ol>	

**Table 9 – Substance review criteria for permitted substances in livestock production**

	<b>Livestock feed (Table 5.2 of CAN/CGSB-32.311)</b>	<b>Livestock health care (Table 5.3 of CAN/CGSB-32.311)</b>
<b>A. Necessity</b>	<ol style="list-style-type: none"> <li>1. Shall be necessary to correct documented essential nutrient deficiencies in the forage or feed ration, when other biological, cultural or physical treatments permitted by this standard are not available; and/or</li> <li>2. Shall be necessary to ensure and preserve product quality, when other biological, cultural or physical treatments permitted by this standard are not available.</li> </ol>	Shall be necessary to prevent or treat livestock health problems when other treatments permitted by this standard are not available.
<b>B. Origin and mode of production</b>	Shall be organic or from non-synthetic sources occurring in nature, such as marine products. Mineral substances are permitted only if they are of natural origin.	Shall be from organic sources or of non-synthetic origin, whenever possible.
<b>C. Impact</b>	<p>Substance reviews shall consider:</p> <ol style="list-style-type: none"> <li>1. The impact of a substance's manufacture and disposal after use on the environment including impacts on ecology, surface and ground water, and soil and air quality including substance persistence, degradation and concentration effects.</li> <li>2. The impact of a substance's use or potential misuse on soil quality (including biological diversity and activity, structure, salinity, sodicity, erodability and tilth), surface and ground water quality, ecosystems (in particular non-target organisms) including wildlife and wildlife habitat, and animal and human health.</li> </ol>	

**Table 10 – Substance review criteria for permitted substances in processing of organic food**

	<b>Food ingredients and processing aids (Tables 6.3-6.5 of CAN/CGSB-32.311)</b>
<b>A. Necessity</b>	<ol style="list-style-type: none"> <li>1. Shall be necessary to correct documented, essential nutrient deficiencies of the product, that is, vitamins and minerals; or when required by regulations; and/or</li> <li>2. Shall be essential for ensuring the safety of the product; or</li> <li>3. Shall be used only when it is not feasible or practical to produce or store such products without the use of these substances; or</li> <li>4. Shall be necessary to achieve a technological effect during processing (for example, filtration) or an organoleptic effect in the final product (for example, colouring and flavouring).</li> </ol>
<b>B. Origin and mode of production</b>	<ol style="list-style-type: none"> <li>1. Shall be found in nature. Substances may be produced using physical (for example, extraction, precipitation), enzymatic or microbial (for example, fermentation) processes, as well as through chemical extractions that do not alter the substance's chemical structure.</li> <li>2. Preferably from organic sources.</li> <li>3. If non-synthetic forms of these substances do not exist, synthetic substances may be considered.</li> </ol>
<b>C. Impact</b>	<p>Substance reviews shall consider the impact of use and potential misuse on:</p> <ol style="list-style-type: none"> <li>1. Human health through both food and non-food exposure, including acute and chronic toxicity, allergenicity and metabolites;</li> <li>2. product quality, including nutrition, flavour, taste, appearance and storage, if applicable;</li> <li>3. consumer perception of the nature, substance and quality of a food product.</li> </ol>

**Table 11 – Substance review criteria for permitted substances in cleaning and sanitation**

	<b>Cleaning and sanitation substances (Tables 7.3 and 7.4 of CAN/CGSB-32.311)</b>	<b>Facility management substances (Tables 8.2 and 8.3 of CAN/CGSB-32.311)</b>
<b>A. Necessity</b>	Substances used for cleaning and sanitizing organic products and organic product contact surfaces shall be necessary and appropriate for the intended use.	Substances used for pest control or to cause a post-harvest physiological effect shall be necessary and appropriate for the intended use.
<b>B. Origin and mode of production</b>	<ol style="list-style-type: none"> <li>1. Shall be non-synthetic whenever possible.</li> <li>2. If non-synthetic forms of these substances do not exist, synthetic substances may be considered.</li> </ol>	
<b>C. Impact</b>	<p>Substance reviews shall consider:</p> <ol style="list-style-type: none"> <li>1. The impact of a substance's manufacture and disposal after use on the environment including impacts on ecology, surface and ground water, and soil and air quality including substance persistence, degradation and concentration effects.</li> <li>2. The impact of a substance's use or potential misuse on soil quality (including biological diversity and activity, structure, salinity, sodicity, erodability and tilth), surface and ground water quality, ecosystems (in particular non-target organisms) including wildlife and wildlife habitat, and animal and human health.</li> </ol>	

## Annex A (informative)

### Categorization of organic products

**Table A.1 – Categorization of organic products based on their percentage of organic ingredients**

Summary	Categories		
	95% <sup>a</sup> (or more)	70-95% <sup>b</sup> (or more)	<70% <sup>c</sup>
May not contain an ingredient in both its organic and non-organic form.	✓	✓	
May contain up to 5% non-organic ingredients if the organic form is not commercially available.	✓		
May contain up to 30% non-organic ingredients.		✓	
May contain less than 70% organic ingredients.			✓
Non-organic ingredients both “classified as food additives”, and “not classified as food additives,” shall be listed in Tables 6.3 and 6.4 of CAN/CGSB-32.311, meet the specified annotations and comply with 6.2 of CAN/CGSB-32.311.	✓	✓	
Whether listed or not in Tables 6.3 and 6.4 of CAN/CGSB-32.311, agricultural, non-organic ingredients shall meet 1.4 a), c) and h), and 6.2 of CAN/CGSB-32.311.	✓	✓	
Non-listed agricultural, non-organic ingredients are subject to commercially availability requirements.	✓		
Non-organic processing aids of agricultural origin are permitted, subject to the requirements of 1.4 a), b), c), and h); and any annotations listed in Table 6.5 of CAN/CGSB-32.311.	✓	✓	
Non-agricultural processing aids are permitted if they are listed in Table 6.5 (processing aids) of CAN/CGSB-32.311.	✓	✓	
<p><sup>a</sup> Products compliant with 9.2.1 may be identified as organic.</p> <p><sup>b</sup> Products compliant with 9.2.2 may only declare the percentage of organic ingredients.</p> <p><sup>c</sup> Products with less than 70% organic content may identify which ingredients are organic in their ingredient list. For full labelling requirements refer to current regulations.</p>			

## **Annex B** *(informative)*

### **Historical organic principles**

The principles listed below were the original principles published in 2006. Though they have been updated in the introduction of this standard, they have been retained in this annex to provide context for existing organic plans.

Organic production is based on principles that support healthy practices. These principles aim to increase the quality and the durability of the environment through specific management and production methods. They also focus on ensuring the humane treatment of animals.

The general principles of organic production include the following:

1. Protect the environment, minimize soil degradation and erosion, decrease pollution, optimize biological productivity and promote a sound state of health.
2. Maintain long-term soil fertility by optimizing conditions for biological activity within the soil.
3. Maintain biological diversity within the system.
4. Recycle materials and resources to the greatest extent possible within the enterprise.
5. Provide attentive care that promotes the health and meets the behavioural needs of livestock.
6. Prepare organic products, emphasizing careful processing, and handling methods in order to maintain the organic integrity and vital qualities of the products at all stages of production.
7. Rely on renewable resources in locally organized agriculture systems.

## Bibliography

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- [2] Canadian Food Inspection Agency (CFIA), Organic Products Regulations, 2009 (SOR/2009-176). Available from CFIA at <http://inspection.gc.ca> or from Justice Laws Website at <http://laws-lois.justice.gc.ca>.
- [3] Certified Organic Associations of British Columbia (COABC), *British Columbia Certified Organic Production Operation Policies and Management Standards*, December 2009. Available from <http://www.certifiedorganic.bc.ca>.
- [4] Codex Alimentarius Commission, CAC/GL 20-1995 — *Principles for Food Import and Export Certification and Inspection*. Available from <http://www.codexalimentarius.org>.
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- [6] Conseil des appellations réservées et des termes valorisants (CARTV), *Québec Organic Designation Specification Manual*, January 2015. Available from <http://www.cartv.gouv.qc.ca>.
- [7] Health Canada (HC), *Pest Control Products Act* (2002, c. 28). Available from <http://www.justice.gc.ca>.
- [8] International Federation of Organic Agriculture Movements (IFOAM), *IFOAM Norms for Organic Production and Processing*, August 2014. Available from <http://www.ifoam.bio>.
- [9] U.S. Department of Agriculture, Agricultural Marketing Service, National Organic Program. Available from <http://www.ams.usda.gov/AMSV1.0/nop>.

## Schurkamp, Lynnea - AMS

---

**From:** Alexandra "Gamai" Gregory <ggregory@ccof.org>  
**Sent:** Thursday, December 10, 2015 4:24 PM  
**To:** Yang, RobertH - AMS  
**Cc:** Lewin Jake-FASConatct; Amy Lamendella  
**Subject:** Clarification: Hydroponic in US/Canada Equivalence  
**Attachments:** CAN CGSB-32.310-2015E.PDF

Hello Robert,

With the recent Canadian Organic Regime (COR) standards change, we are not sure how to best honor the Canadian equivalence critical variance of prohibiting hydroponic products for export to Canada.

The COR standard has become more prescriptive as to what is classified as non-hydroponic container grown (see excerpt below), and we are not sure if we should now use these conditions to classify hydroponic product. We currently use the Canadian definition of hydroponic ("cultivation of plants in aqueous nutrient solutions without the aid of soil") and our own criteria for non-hydroponic container grown crops.

### Excerpt from CAN/CGSB-32.310-2015

*7.5.5 The following conditions apply to containerized, staked crops (for example, tomatoes, sweet peppers, cucumbers, eggplant):*

- a) at the start of production, the total volume of soil shall consist of at least 10% compost;*
- b) compost shall be included in the fertility program;*
- c) containers shall be at least 30 cm (12 in.) high; and*
- d) the soil volume shall be at least 70 L/m<sup>2</sup> (15.4 gal./10.8 ft<sup>2</sup>), based on the total growing area*

Thank you in advance for your response,

**Alexandra "Gamai" Gregory**  
Senior International & Programs Specialist  
CCOF Certification Services, LLC  
2155 Delaware Ave., Suite 150  
Santa Cruz, CA 95060  
(831) 423-2263, ext. 6234  
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[ggregory@ccof.org](mailto:ggregory@ccof.org)  
[www.ccof.org](http://www.ccof.org)

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## **Decision to approve the use of Oasis® Horticultures® in organic hydroponic production.**

A Bee Organic has determined that Oasis® Horticultures® qualifies for organic production because it is an inert plastic growing container, similar to allowable plastic net pot containers.

The following definition was consulted when reviewing Oasis® Horticultures®:

- NOSB letter to NOP on April 29, 2010:

**Hydroponics-** The production of normally terrestrial, vascular plants in nutrient rich solutions or in an inert, porous, solid matrix bathed in nutrient rich solutions.

The following sections of 7 CFR Part 205 were consulted when reviewing Oasis® Horticultures®:

**§205.2** Terms defined- See attached sheet “Distinction between substances and materials in §205.2”

Substances and materials are not defined by NOP. So we looked up definitions of substance and material and chose the one(s) that seemed most relevant to the terms.

The common definition for substance (as a noun) is: “A type of solid, liquid or gas that has particular qualities.” *Examples: a chemical/radioactive, etc. substance, banned or illegal substances, a sticky substance*

Common definitions of material are: “Things that are needed in order to do a particular activity.” *Examples: household cleaning materials, training materials* and “A substance that things can be made from” *Examples: building materials, raw materials.*

**We realized that neither word was applicable to Oasis® Horticultures®. The word “object”, defined as “a thing that you can see and touch and that is not alive” was applicable. While potting soil and coconut fiber seem to fit into the NOP distinction of “materials”, Oasis® Horticultures® do not.**

**§205.105** Allowed and prohibited substances, methods, and ingredients in organic production and handling. To be sold or labeled as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s)),” the product must be produced and handled without the use of:

- (a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603;
- (b) Nonsynthetic substances prohibited in §205.602 or §205.604;
- (c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605;
- (d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606;
- (e) Excluded methods, except for vaccines: Provided, That, the vaccines are approved in accordance with §205.600(a);
- (f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and
- (g) Sewage sludge.

**§205.600** Evaluation criteria for allowed and prohibited substances, methods, and ingredients. The following criteria will be utilized in the evaluation of substances or ingredients for the organic production and handling sections of the National List:

- (a) Synthetic and nonsynthetic substances considered for inclusion on or deletion from the National List of allowed and prohibited substances will be evaluated using the criteria specified in the Act (7 U.S.C. 6517 and 6518).

**Both sections of the rule are looking at substances, methods, and ingredients. Oasis® Horticultures® are none of these. For due diligence we went back to the Act mentioned in 205.600 (OFPA) and found the following information on how the NOSB should evaluate substances:**

**§2119.17 U.S.C. 6517 (m) EVALUATION.** In evaluating substances considered for inclusion in the proposed National List or proposed amendment to the National List, the Board shall consider

- (1) the potential of such substances for detrimental chemical interactions with other materials used in organic farming systems;
- (2) the toxicity and mode of action of the substance and of its breakdown products or any contaminants, and their persistence and areas of concentration in the environment.
- (3) the probability of environmental contamination during manufacture, use, misuse or disposal of such substance;
- (4) the effect of the substance on human health;
- (5) the effects of the substance on biological and chemical interactions in the agroecosystem, including the physiological effects of the substance on soil organisms (including the salt index and solubility of the soil), crop and livestock.
- (6) the alternatives to using the substance in terms of practices or other available materials; and
- (7) its compatibility with a system of sustainable agriculture.

**The manufacturer of Oasis® Horticultures® provided a letter stating that there are no active ingredients in Oasis® Horticultures®. The letter stated that the cubes are similar to florist foam, are completely inert and do not leach any substance or material into water. See attached letter “Oasis® Horticultures® composition”**

**We considered all of the evaluation criteria and the information provided and found**

- 1- No potential detrimental chemical actions**
- 2- No toxicity or breakdown into contaminants**
- 3- No probability of environmental contamination**
- 4- No effect on human health**
- 5- No effect on the agrosystem**
- 6- Oasis® Horticultures® are less likely to be contaminated than coconut coir blocks which are the only alternative and not suitable for some hydroponic and aquaponic systems.**
- 7- Like any container, Oasis® Horticultures® are outside of the grower’s sustainability loop. However, the cubes are low density and contain no abrasive fibers.**

**Conclusion:**

**Oasis® Horticultures® do not fall under any definition of a “substance”. They are not added or applied to plants. They are not taken up by the plant root system, nor do they become a part of the plant. They are a structural support system, a permeable container.**

**Oasis® Horticultures® are NOT composed of rockwool. Oasis® Horticultures® do not pose a risk to human health or the environment any more (and perhaps less) than plastic pots, float systems, irrigation pipes, hoses, and numerous other objects used in production of organic agricultural products.**

**A Bee Organic approves Oasis® Horticultures® for use as a container/support system in organic hydroponic and aquaponic systems.**

**A Bee Organic has not yet reviewed Oasis® Rootcubes® or Oasis® Rootcubes Plus® as none of our certified producers use these products.**

## Distinction between substances and materials in §205.2

A Bee Organic has noted all use of “substance” or “material” in terms defined in §205.2. These words are highlighted in bold red or green to differentiate. We discovered that the word “substance” was generally used to define a synthetic or processed matter while the word “material” was used to define nonsynthetic matter. However, confusing the issue, nonsynthetic substance is one of the terms. (The entire definition is not given in this list, just areas where the words “substance” and/or “material” appear.)

*Agricultural inputs.* All **substances** or **materials** used in the production or handling of organic agricultural products.

*Ingredient.* Any **substance**...

*Feed.* Edible **materials**...

*Feed additive.* A **substance**...

*Fertilizer.* A single or blended **substance** containing one or more recognized plant nutrient(s) which is used primarily for its plant nutrient content and which is designed for use or claimed to have value in promoting plant growth.

*Forage.* Vegetative **material**

*Inert ingredient.* Any **substance** (or **group of substances** with similar chemical structures...

*Mulch.* Any nonsynthetic **material**...

*National List.* A list of allowed and prohibited **substances**...

*Nonagricultural substance.* A **substance** that is not a product of agriculture, such as a mineral or a bacterial culture, that is used as an ingredient in an agricultural product. For the purposes of this part, a nonagricultural ingredient also includes any **substance**, such as gums, citric acid, or pectin, that is extracted from, isolated from, or a fraction of an agricultural product so that the identity of the agricultural product is unrecognizable in the extract, isolate, or fraction.

*Nonsynthetic (natural).* A **substance** that is derived from mineral, plant, or animal matter and does not undergo a synthetic process as defined in section 6502(21) of the Act (7 U.S.C. 6502(21)). For the purposes of this part, nonsynthetic is used as a synonym for natural as the term is used in the Act.

*Pesticide.* Any **substance** which alone, in chemical combination, or in any formulation with one or more **substances** is defined as a pesticide in section 2(u) of the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. 136(u) et seq).

*Processing aid.* (1) **Substance** that is added to a food during the processing of such food but is removed in some manner from the food before it is packaged in its finished form;

(2) a **substance** that is added to a food during processing, is converted into constituents normally present in the food, and does not significantly increase the amount of the constituents naturally found in the food; and

(3) a **substance** that is added to a food for its technical or functional effect in the processing but is present in the finished food at insignificant levels and does not have any technical or functional effect in that food.

*Prohibited substance.* A **substance** the use of which in any aspect of organic production or handling is prohibited or not provided for in the Act or the regulations of this part.

*Residue testing.* An official or validated analytical procedure that detects, identifies, and measures the presence of chemical **substances**, their metabolites, or degradation products in or on raw or processed agricultural products.

*Synthetic.* A **substance** that is formulated or manufactured by a chemical process or by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral sources, except that such term shall not apply to **substances** created by naturally occurring biological processes.

## Schurkamp, Lynnea - AMS

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**From:** Brines, Lisa - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BRINES, LISA76BD0B16-352D-42DE-BC50-FCF457F88103>  
**Sent:** Wednesday, August 20, 2014 4:00 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: CCOF / A Bee Organics - Hydroponics Product  
**Attachments:** Oasis Grower Solutions growth media.pdf

FYI. CCOF notice of discrepancy with A Bee Organics (hydroponics products)

---

**From:** Brines, Lisa - AMS  
**Sent:** Wednesday, May 21, 2014 1:01 PM  
**To:** devon@ccof.org  
**Cc:** jake@ccof.org; Rakola, Betsy - AMS; Mann, Renee - AMS  
**Subject:** RE: Notification per PM 11-4 Oasis Grower Solutions Growth Media

Dear Mr. Patillo:

Thank you for contacting the USDA National Organic Program. We have received your notification below regarding a possible discrepancy regarding the status of the products Horticultures and Rootcultures for crop production under the USDA organic regulations.

The information you provided is under review. We will contact you by email if additional information is needed to determine whether the regulations have been properly applied in evaluating this product.

If you have any further questions, please do not hesitate to let me know.

Sincerely,

Lisa M. Brines, Ph.D.  
National List Manager  
Standards Division, National Organic Program  
USDA Agricultural Marketing Service  
Direct: 202-821-9683  
[lisa.brines@ams.usda.gov](mailto:lisa.brines@ams.usda.gov)

*Register for the USDA Organic Insider, the National Organic Program's email notification service, by visiting <http://bit.ly/NOPOrganicInsiderRegistration>.*

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**From:** AMS - Guidance, NOP  
**Sent:** Tuesday, May 20, 2014 8:07 PM  
**To:** Brines, Lisa - AMS  
**Subject:** FW: Notification per PM 11-4 Oasis Grower Solutions Growth Media

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**From:** Devon Pattillo  
**Sent:** Wednesday, May 21, 2014 12:07:11 AM (UTC) Coordinated Universal Time

**To:** AMS - Guidance, NOP  
**Cc:** Jake Lewin; Rakola, Betsy - AMS  
**Subject:** Notification per PM 11-4 Oasis Grower Solutions Growth Media

Per [NOP Policy Memo 11-4](#), CCOF is providing NOP with this notification.

CCOF differs from A Bee Organic in our evaluation of the product “Horticubes” and “Rootcubes” by Oasis Grower Solutions. See <http://www.oasiseasyhydro.com/oasis-easy-hydro-horticubes-product.asp>. These are growing media products used in hydroponic systems.

CCOF is evaluating hydroponic growing media based on 1) determination of synthetic vs. non-synthetic status, and 2) the potential for uptake and/or translocation of synthetic materials via root-media interaction.

As we understand it, this is a phenolic foam product based on phenol-formaldehyde chemistry with added surfactants, colorants, and catalysts (see attached). Therefore, we find these material to be synthetic and not allowed per the National List. This is based on information provided by the manufacturer about the manufacturing process (attached).

Furthermore, we expect plant roots to permeate the growing media and therefore expect significant root-media interaction (compared to a Styrofoam block used to float plants, for instance). Our evaluation of the of the potential for root-media interactions is supported by evidence presented in the attached document (page 3) disclosing that analysis of plants grown on these products indicate presence of surfactants and sulfonic acids. These are synthetic products involved in the manufacture of the products.

CCOF has not allowed our certified hydroponic operations to use these specific products and have communicated the same position on a number of similar products. We also understand our review practices to be aligned with OMRI’s policies and those of other accredited certifiers.

We have communicated in the past with Ron Elgas at A Bee Organic on this issue and he has notified us that they differ from CCOF in our conclusion on this material.

Please let me know if you need anything else from CCOF. We look forward to hearing from you soon.

Regards,

**Devon Pattillo**

Livestock Certification Supervisor & Materials Coordinator  
CCOF

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Visit CCOF on [Facebook](#) and [Twitter](#)

## Schurkamp, Lynnea - AMS

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**From:** Dave Lockman <dave.lockman@pro-cert.org>  
**Sent:** Wednesday, March 09, 2016 1:16 PM  
**To:** McElroy, Bridget - AMS  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**Attachments:** image001.jpg

Dear Bridget,

We do not currently certify hydroponic, aeroponic or aquaponics operations.

If you have any questions please do not hesitate to contact me.

Sincerely,

**Pro-Cert Organic Systems Ltd.**

Dave Lockman, MBA, P.Ag.

Certification Manager, Eastern Region

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**From:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **On Behalf Of** AMS - AIAinbox  
**Sent:** March-01-16 10:12 AM  
**To:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>  
**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); Koble, Clinton - FSA, Reno, NV <[clinton.koble@nv.usda.gov](mailto:clinton.koble@nv.usda.gov)>; [emel.erkan@bio-inspecta.com](mailto:emel.erkan@bio-inspecta.com); [central@biolatina.com](mailto:central@biolatina.com); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); [amalia.rueda@bioagricert.org](mailto:amalia.rueda@bioagricert.org); [admin@bio-inspecta.ch](mailto:admin@bio-inspecta.ch); [central@biolatina.com](mailto:central@biolatina.com); [Pat.Kennelly@cdph.ca.gov](mailto:Pat.Kennelly@cdph.ca.gov); [info@bioagricert.org](mailto:info@bioagricert.org); [julia.winter@bio-inspecta.ch](mailto:julia.winter@bio-inspecta.ch); [accreditation@ccof.org](mailto:accreditation@ccof.org); [Bolicert@megalink.com](mailto:Bolicert@megalink.com); [riccardo.cozzo@bioagricert.org](mailto:riccardo.cozzo@bioagricert.org); [calidad@certimexsc.com](mailto:calidad@certimexsc.com); [rporto@caae.es](mailto:rporto@caae.es); [Bolicert@bolicert.org](mailto:Bolicert@bolicert.org); [tom.nizet@certisys.eu](mailto:tom.nizet@certisys.eu); [ccof@ccof.org](mailto:ccof@ccof.org); [rporto@caae.es](mailto:rporto@caae.es); [saltmn@clemson.edu](mailto:saltmn@clemson.edu); [ccpb@ccpb.it](mailto:ccpb@ccpb.it); [Danny.Lee@cdfa.ca.gov](mailto:Danny.Lee@cdfa.ca.gov); [mitchell.yergert@state.co.us](mailto:mitchell.yergert@state.co.us); [certimex@certimexsc.com](mailto:certimex@certimexsc.com); Lewin Jake-FASConatct <[jake@ccof.org](mailto:jake@ccof.org)>; [jvdschootbrugge@controlunion.com](mailto:jvdschootbrugge@controlunion.com); [ceres@ceres-cert.com](mailto:ceres@ceres-cert.com); [rsetti@ccpb.it](mailto:rsetti@ccpb.it); [vincent.morel@ecocert.com](mailto:vincent.morel@ecocert.com); [info@certisys.eu](mailto:info@certisys.eu); [direccionejecutiva@certimexsc.com](mailto:direccionejecutiva@certimexsc.com); [agroecologiauna@gmail.com](mailto:agroecologiauna@gmail.com); [organic@clemson.edu](mailto:organic@clemson.edu); [benzing@ceres-cert.com](mailto:benzing@ceres-cert.com); [mefraga@foodsafety.com.ar](mailto:mefraga@foodsafety.com.ar); [amy.stafford@state.co.us](mailto:amy.stafford@state.co.us);

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**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both



systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Mann, Renee - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MANN, RENEE6BA41DDD-4FFB-41B9-9712-F7EF2E4B19ED>  
**Sent:** Tuesday, March 01, 2016 10:35 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

FYI

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
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**From:** Baron , Anne - AMS  
**Sent:** Tuesday, March 01, 2016 10:29 AM  
**To:** Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>; Crail, Lars - AMS <Lars.Crail@ams.usda.gov>; Gebault King, ReneeA - AMS <ReneeA.GebaultKing@ams.usda.gov>; Lopez, JasonJ - AMS <JasonJ.Lopez@ams.usda.gov>; Lusby, MaryLou - AMS <MaryLou.Lusby@ams.usda.gov>; Mann, Renee - AMS <Renee.Mann@ams.usda.gov>; Yang, RobertH - AMS <RobertH.Yang@ams.usda.gov>; Zuck, Penelope - AMS <Penelope.Zuck@ams.usda.gov>; Adams, Edith - AMS <Edith.Adams@ams.usda.gov>; Caceres, Miguel - AMS <Miguel.Caceres@ams.usda.gov>; Friesenhahn, Martin - AMS <Martin.Friesenhahn@ams.usda.gov>; Gilbert, Corey - AMS <Corey.Gilbert@ams.usda.gov>; Heckart, Patricia - AMS <Patricia.Heckart@ams.usda.gov>; Hildreth, David - AMS <David.Hildreth@ams.usda.gov>; Horne, Willy - AMS <Willy.Horne@ams.usda.gov>; Kohles, Alan - AMS <Alan.Kohles@ams.usda.gov>; Lopez, Mike - AMS <Mike.Lopez@ams.usda.gov>; Matejovsky, Kathryn - AMS <Kathryn.Matejovsky@ams.usda.gov>; Ross, Steve - AMS <Steve.Ross@ams.usda.gov>; Schoop, Jamie - AMS <Jamie.Schoop@ams.usda.gov>; Skinner, Rick - AMS <Rick.Skinner@ams.usda.gov>; Wilson, Darrell - AMS <Darrell.Wilson@ams.usda.gov>; Gebel, Kelley - AMS <Kelley.Gebel@ams.usda.gov>; McEvoy, Miles - AMS <Miles.McEvoy@ams.usda.gov>; Tucker, Jennifer - AMS <Jennifer.Tucker@ams.usda.gov>; Nelson, Kristen - AMS <Kristen.Nelson@ams.usda.gov>; Lewis, Paul I - AMS <Paull.Lewis@ams.usda.gov>; Holmes, Vella - AMS <Vella.Holmes@ams.usda.gov>; Michael, Matthew - AMS <Matthew.Michael@ams.usda.gov>; andy@oeffa.org  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear AIA staff, NOP Management Team and QAD auditors,

Please find below the message sent to the certifiers.  
Let us know if you have any questions.

Regards,  
Alvik Joseph

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**From:** Baron , Anne - AMS **On Behalf Of** AMS - AIAinbox  
**Sent:** Tuesday, March 01, 2016 10:12 AM  
**To:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>  
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'Mary.Holliman@texasagriculture.gov' <[Mary.Holliman@texasagriculture.gov](mailto:Mary.Holliman@texasagriculture.gov)>; 'dennis.chambers@yolocounty.org' <[dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)>; '(b) (6) @gmail.com' <(b) (6) @gmail.com>; 'rlarsen@utah.gov' <[rlarsen@utah.gov](mailto:rlarsen@utah.gov)>; 'Nicole@nofavt.org' <[Nicole@nofavt.org](mailto:Nicole@nofavt.org)>; 'bbook@agr.wa.gov' <[bbook@agr.wa.gov](mailto:bbook@agr.wa.gov)>;

'dennis.chambers@yolocounty.org' <[dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)>

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply.

Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division



## Schurkamp, Lynnea - AMS

---

**From:** Baron , Anne - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BARON, ANNE -9E6767D8-A2C1-4F25-B867-3CDCFF9C6FF6AA9>  
**Sent:** Tuesday, March 01, 2016 10:29 AM  
**To:** Courtney, Cheri - AMS; Crail, Lars - AMS; Gebault King, ReneeA - AMS; Lopez, JasonJ - AMS; Lusby, MaryLou - AMS; Mann, Renee - AMS; Yang, RobertH - AMS; Zuck, Penelope - AMS; Adams, Edith - AMS; Caceres, Miguel - AMS; Friesenhahn, Martin - AMS; Gilbert, Corey - AMS; Heckart, Patricia - AMS; Hildreth, David - AMS; Horne, Willy - AMS; Kohles, Alan - AMS; Lopez, Mike - AMS; Matejovsky, Kathryn - AMS; Ross, Steve - AMS; Schoop, Jamie - AMS; Skinner, Rick - AMS; Wilson, Darrell - AMS; Gebel, Kelley - AMS; McEvoy, Miles - AMS; Tucker, Jennifer - AMS; Nelson, Kristen - AMS; Lewis, Paul I - AMS; Holmes, Vella - AMS; Michael, Matthew - AMS; andy@oeffa.org  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear AIA staff, NOP Management Team and QAD auditors,

Please find below the message sent to the certifiers.  
Let us know if you have any questions.

Regards,  
Alvik Joseph

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**From:** Baron , Anne - AMS **On Behalf Of** AMS - AIAinbox  
**Sent:** Tuesday, March 01, 2016 10:12 AM  
**To:** AMS - AIAinbox <AIAinbox@ams.usda.gov>  
**Cc:** 'admin@abeeorganic.com' <admin@abeeorganic.com>; 'sarah@abeeorganic.com' <sarah@abeeorganic.com>; 'ro@abeeorganic.com' <ro@abeeorganic.com>; 'info@ascorganic.com' <info@ascorganic.com>; 'Kat@ascorganic.com' <Kat@ascorganic.com>; 'mfigueiras@argencert.com.ar' <mfigueiras@argencert.com.ar>; 'americert@gmail.com' <americert@gmail.com>; 'americert@gmail.com' <americert@gmail.com>; 'organic@ausmeat.com.au' <organic@ausmeat.com.au>; 'info@argencert.com.ar' <info@argencert.com.ar>; 'lmontenegro@argencert.com.ar' <lmontenegro@argencert.com.ar>; 'jorge.larranaga@aco.net.au' <jorge.larranaga@aco.net.au>; 'organic@ausqual.com.au' <organic@ausqual.com.au>; 'elise@ausqual.com.au' <elise@ausqual.com.au>; 'dcox@baystateorganic.org' <dcox@baystateorganic.org>; 'michael.baker@aco.net.au' <michael.baker@aco.net.au>; 'michael.baker@aco.net.au' <michael.baker@aco.net.au>; 'roxana.priego@biolatina.com.pe' <roxana.priego@biolatina.com.pe>; 'baystateorganic@earthlink.net' <baystateorganic@earthlink.net>; Koble, Clinton - FSA, Reno, NV <clinton.koble@nv.usda.gov>; 'emel.erkon@bio-inspecta.com' <emel.erkon@bio-inspecta.com>; 'central@biolatina.com' <central@biolatina.com>; 'baystateorganic@earthlink.net' <baystateorganic@earthlink.net>; 'amalia.rueda@bioagricert.org' <amalia.rueda@bioagricert.org>; 'admin@bio-inspecta.ch' <admin@bio-inspecta.ch>; 'central@biolatina.com' <central@biolatina.com>; 'Pat.Kennelly@cdph.ca.gov' <Pat.Kennelly@cdph.ca.gov>; 'info@bioagricert.org' <info@bioagricert.org>; 'julia.winter@bio-inspecta.ch' <julia.winter@bio-inspecta.ch>; 'accreditation@ccof.org' <accreditation@ccof.org>; 'Bolicert@megalink.com' <Bolicert@megalink.com>; 'riccardo.cozzo@bioagricert.org' <riccardo.cozzo@bioagricert.org>; 'calidad@certimexsc.com' <calidad@certimexsc.com>; 'rporto@caae.es' <rporto@caae.es>; 'Bolicert@bolicert.org' <Bolicert@bolicert.org>; 'tom.nizet@certisys.eu' <tom.nizet@certisys.eu>; 'ccof@ccof.org' <ccof@ccof.org>; 'rporto@caae.es' <rporto@caae.es>; saltmn@clemson.edu; 'ccpb@ccpb.it' <ccpb@ccpb.it>; 'Danny.Lee@cdfa.ca.gov' <Danny.Lee@cdfa.ca.gov>; 'mitchell.yergert@state.co.us' <mitchell.yergert@state.co.us>; 'certimex@certimexsc.com' <certimex@certimexsc.com>; Lewin Jake-FASConatct <jake@ccof.org>; 'jvdschootbrugge@controlunion.com' <jvdschootbrugge@controlunion.com>; 'ceres@ceres-cert.com' <ceres@ceres-cert.com>; 'rsetti@ccpb.it'

<rsetti@ccpb.it>; 'vincent.morel@ecocert.com' <vincent.morel@ecocert.com>; 'info@certisys.eu' <info@certisys.eu>; 'direccionejecutiva@certimexsc.com' <direccionejecutiva@certimexsc.com>; 'agroecologiauna@gmail.com' <agroecologiauna@gmail.com>; 'organic@clemson.edu' <organic@clemson.edu>; 'benzing@ceres-cert.com' <benzing@ceres-cert.com>; 'mefraga@foodsafety.com.ar' <mefraga@foodsafety.com.ar>; 'amy.stafford@state.co.us' <amy.stafford@state.co.us>; 'Nathalie.Boes@certisys.eu' <Nathalie.Boes@certisys.eu>; 'joy.mccracken@georgiacrop.com' <joy.mccracken@georgiacrop.com>; 'organic@controlunion.com' <organic@controlunion.com>; 'organic@clemson.edu' <organic@clemson.edu>; 'cvanhook77@earthlink.net' <cvanhook77@earthlink.net>; 'info.ecocertico@ecocert.com' <info.ecocertico@ecocert.com>; 'amy.stafford@state.co.us' <amy.stafford@state.co.us>; 'goabecky@centurylink.net' <goabecky@centurylink.net>; 'aude.bonnet@ecocert.com' <aude.bonnet@ecocert.com>; 'dszalai@controlunion.com' <dszalai@controlunion.com>; 'camila@ibd.com.br' <camila@ibd.com.br>; 'ep@ecoglobe.am' <ep@ecoglobe.am>; 'Jeffry.EVARD@ecocert.com' <Jeffry.EVARD@ecocert.com>; 'Jason.Laney@agri.idaho.gov' <Jason.Laney@agri.idaho.gov>; 'pdescamps@ecologica.com' <pdescamps@ecologica.com>; 'aude.bonnet@ecocert.com' <aude.bonnet@ecocert.com>; 'Beatrice.Breuer@imo.ch' <Beatrice.Breuer@imo.ch>; 'info@etko.org' <info@etko.org>; 'nd@ecoglobe.am' <nd@ecoglobe.am>; 'Mary.nieland@iowaagriculture.gov' <Mary.nieland@iowaagriculture.gov>; 'foodsafety@foodsafety.com.ar' <foodsafety@foodsafety.com.ar>; 'pdescamps@ecologica.com' <pdescamps@ecologica.com>; 'p.perrone@icea.info' <p.perrone@icea.info>; 'terry.hollifield@georgiacrop.com' <terry.hollifield@georgiacrop.com>; 'ma@etko.org' <ma@etko.org>; 'Kristen.Branscum@ky.gov' <Kristen.Branscum@ky.gov>; 'info@globalculture.us' <info@globalculture.us>; 'calidad@foodsafety.com.ar' <calidad@foodsafety.com.ar>; 'herr@bcs-oeko.de' <herr@bcs-oeko.de>; 'goaorg@centurylink.net' <goaorg@centurylink.net>; 'terry.hollifield@georgiacrop.com' <terry.hollifield@georgiacrop.com>; 'a.moutapam@lacon-institut.org' <a.moutapam@lacon-institut.org>; 'lbd@lbd.com.br' <lbd@lbd.com.br>; 'globalculture@earthlink.net' <globalculture@earthlink.net>; 'monica@letis.org' <monica@letis.org>; 'Johanna.Phillips@agri.idaho.gov' <Johanna.Phillips@agri.idaho.gov>; 'goaorg@centurylink.net' <goaorg@centurylink.net>; 'scarsen@co.marin.ca.us' <scarsen@co.marin.ca.us>; 'imo@imo.ch' <imo@imo.ch>; 'gwendal@ibd.com.br' <gwendal@ibd.com.br>; 'juanantonio.mendoza@mayacert.com' <juanantonio.mendoza@mayacert.com>; 'info@ics-intl.com' <info@ics-intl.com>; 'Johanna.Phillips@agri.idaho.gov' <Johanna.Phillips@agri.idaho.gov>; 'spwalker@mosaorganic.org' <spwalker@mosaorganic.org>; 'maury.wills@iowaagriculture.gov' <maury.wills@iowaagriculture.gov>; 'soh@imo.ch' <soh@imo.ch>; 'wipl001@umn.edu' <wipl001@umn.edu>; 'nop@icea.info' <nop@icea.info>; 'dawn@ics-intl.com' <dawn@ics-intl.com>; 'knewkirk@mofga.org' <knewkirk@mofga.org>; 'adam.watson@ky.gov' <adam.watson@ky.gov>; 'maury.wills@iowaagriculture.gov' <maury.wills@iowaagriculture.gov>; 'etyanich@mt.gov' <etyanich@mt.gov>; 'info@bcs-oeko.de' <info@bcs-oeko.de>; 'nop@icea.info' <nop@icea.info>; 'CarltonN@co.monterey.ca.us' <CarltonN@co.monterey.ca.us>; 'lacon@lacon-institut.org' <lacon@lacon-institut.org>; 'adam.watson@ky.gov' <adam.watson@ky.gov>; 'kirriley.becker@nasaa.com.au' <kirriley.becker@nasaa.com.au>; 'letis@letis.org' <letis@letis.org>; 'fischer@bcs-oeko.de' <fischer@bcs-oeko.de>; 'cfanta@naturesinternational.com' <cfanta@naturesinternational.com>; 'jstiles@marincounty.org' <jstiles@marincounty.org>; 'j.kopp@lacon-institut.org' <j.kopp@lacon-institut.org>; 'jabbott@agri.nv.gov' <jabbott@agri.nv.gov>; 'FGIS OA, Maryland' <Deanna.Baldwin@maryland.gov>; 'internacional@letis.org' <internacional@letis.org>; 'Victoria.Smith@agr.nh.gov' <Victoria.Smith@agr.nh.gov>; 'info@mayacert.com' <info@mayacert.com>; 'jstiles@marincounty.org' <jstiles@marincounty.org>; 'Daniel.wunderlich@ag.state.nj.us' <Daniel.wunderlich@ag.state.nj.us>; 'mosa@mosaorganic.org' <mosa@mosaorganic.org>; 'FGIS OA, Maryland' <Deanna.Baldwin@maryland.gov>; 'SGerk@nmda.nmsu.edu' <SGerk@nmda.nmsu.edu>; 'mncia@mncia.org' <mncia@mncia.org>; 'noe.rivera@mayacert.com' <noe.rivera@mayacert.com>; 'lisaengelbert@nofany.org' <lisaengelbert@nofany.org>; 'certification@mofga.org' <certification@mofga.org>; 'cskolaski@mosaorganic.org' <cskolaski@mosaorganic.org>; 'Bryan.Buchwald@ag.ok.gov' <Bryan.Buchwald@ag.ok.gov>; 'agrorganic@mt.gov' <agrorganic@mt.gov>; 'michelle.menken@mncia.org' <michelle.menken@mncia.org>; 'leng@oda.state.or.us' <leng@oda.state.or.us>; 'agcomm@co.monterey.ca.us' <agcomm@co.monterey.ca.us>; 'yurlina@mofga.org' <yurlina@mofga.org>; 'abrewster@ocia.org' <abrewster@ocia.org>; 'sachin.ayachit@nasaa.com.au' <sachin.ayachit@nasaa.com.au>; 'gwebster@mt.gov' <gwebster@mt.gov>; 'gestiondecabilidad@oia.com.ar' <gestiondecabilidad@oia.com.ar>; 'nfccertification@gmail.com' <nfccertification@gmail.com>; 'Huntinggb@co.monterey.ca.us' <Huntinggb@co.monterey.ca.us>; 'hi.yoshida@omicnet.com' <hi.yoshida@omicnet.com>; 'nics@naturesinternational.com'

<nics@naturesinternational.com>; 'sachin.ayachit@nasaa.com.au' <sachin.ayachit@nasaa.com.au>;  
'kyla@paorganic.org' <kyla@paorganic.org>; 'Jennifer.Gornnert@agr.nh.gov' <Jennifer.Gornnert@agr.nh.gov>;  
'nfc certification@gmail.com' <nfc certification@gmail.com>; 'brian.mansfield@primuslabs.com'  
<brian.mansfield@primuslabs.com>; 'erich.bremer@ag.state.nj.us' <erich.bremer@ag.state.nj.us>;  
'dave@naturesinternational.com' <dave@naturesinternational.com>; 'byron.hamm@pro-cert.org' <byron.hamm@pro-  
cert.org>; 'organic@nmda.nmsu.edu' <organic@nmda.nmsu.edu>; 'ajepson@agri.nv.gov' <ajepson@agri.nv.gov>;  
'thughes@nsf.org' <thughes@nsf.org>; 'certifiedorganic@nofany.org' <certifiedorganic@nofany.org>;  
'Jennifer.Gornnert@agr.nh.gov' <Jennifer.Gornnert@agr.nh.gov>; 'ram@qcsinfo.org' <ram@qcsinfo.org>;  
'organic@oeffa.org' <organic@oeffa.org>; 'erich.bremer@ag.state.nj.us' <erich.bremer@ag.state.nj.us>;  
'dkirsanovaphillips@scscertified.com' <dkirsanovaphillips@scscertified.com>; 'jeff.stearns@ag.ok.gov'  
<jeff.stearns@ag.ok.gov>; 'bbakker@nmda.nmsu.edu' <bbakker@nmda.nmsu.edu>; 'rhougaard@utah.gov'  
<rhougaard@utah.gov>; 'info@onecert.com' <info@onecert.com>; 'lori@nofany.org' <lori@nofany.org>;  
'Laura@nofavt.org' <Laura@nofavt.org>; 'cid-organic@oda.state.or.us' <cid-organic@oda.state.or.us>; 'andy@oeffa.org'  
<andy@oeffa.org>; 'srice@agr.wa.gov' <srice@agr.wa.gov>; 'organic@tilth.org' <organic@tilth.org>;  
'jeff.stearns@ag.ok.gov' <jeff.stearns@ag.ok.gov>; john.young@yolocounty.org; 'info@occert.com' <info@occert.com>;  
'sam@onecert.com' <sam@onecert.com>; 'xiao@ofdc.org.cn' <xiao@ofdc.org.cn>; 'kallen@oda.state.or.us'  
<kallen@oda.state.or.us>; 'oia@oia.com.ar' <oia@oia.com.ar>; 'connie@tilth.org' <connie@tilth.org>;  
'ocd@omicnet.com' <ocd@omicnet.com>; 'susan@occert.com' <susan@occert.com>; 'pco@paorganic.org'  
<pco@paorganic.org>; 'celder@ocia.org' <celder@ocia.org>; 'PrimusOrganic@primuslabs.com'  
<PrimusOrganic@primuslabs.com>; 'xiao@ofdc.org.cn' <xiao@ofdc.org.cn>; 'info@pro-cert.org' <info@pro-cert.org>;  
'pedroalanda@oia.com.ar' <pedroalanda@oia.com.ar>; 'qai@qai-inc.com' <qai@qai-inc.com>; 'ocd@omicnet.com'  
<ocd@omicnet.com>; 'qcs@qcsinfo.org' <qcs@qcsinfo.org>; leslie@paorganic.org; matt.green@dem.ri.gov;  
'deborah.mansfield@primuslabs.com' <deborah.mansfield@primuslabs.com>; 'organic@scsglobalservice.com'  
<organic@scsglobalservice.com>; 'Dave.Lockman@pro-cert.org' <Dave.Lockman@pro-cert.org>; 'Sally@Demeter-  
USA.org' <Sally@Demeter-USA.org>; 'irendon@nsf.org' <irendon@nsf.org>; 'Organic@TexasAgriculture.gov'  
<Organic@TexasAgriculture.gov>; 'robin@qcsinfo.org' <robin@qcsinfo.org>; 'Toaf007@gmail.com'  
<Toaf007@gmail.com>; matt.green@dem.ri.gov; 'rlarsen@utah.gov' <rlarsen@utah.gov>;  
'bnauman@scsglobalservices.com' <bnauman@scsglobalservices.com>; 'Info@nofavt.org' <Info@nofavt.org>;  
'Sally@Demeter-USA.org' <Sally@Demeter-USA.org>; 'organic@agr.wa.gov' <organic@agr.wa.gov>;  
'Mary.Holliman@texasagriculture.gov' <Mary.Holliman@texasagriculture.gov>; 'dennis.chambers@yolocounty.org'  
<dennis.chambers@yolocounty.org>; (b) (6) @gmail.com' (b) (6) @gmail.com>; 'rlarsen@utah.gov'  
<rlarsen@utah.gov>; 'Nicole@nofavt.org' <Nicole@nofavt.org>; 'bbook@agr.wa.gov' <bbook@agr.wa.gov>;  
'dennis.chambers@yolocounty.org' <dennis.chambers@yolocounty.org>

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

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In what state or country (if international) are the certified operations located (list)?

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Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

## Schurkamp, Lynnea - AMS

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**From:** Brines, Lisa - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BRINES, LISA76BD0B16-352D-42DE-BC50-FCF457F88103>  
**Sent:** Monday, September 08, 2014 5:45 PM  
**To:** Bradley, Mark - AMS  
**Cc:** Schurkamp, Lynnea - AMS  
**Subject:** FW: Request for information: Horticubes and Rootcubes  
**Attachments:** image001.jpg; Decision to approve the use of Oasis® Horticubes®.docx; Distinction between substances and materials in 205.2.docx; Oasis Safety Letter.docx

Hi Mark,

Below is some additional information related to a hydroponics product that the Materials Team has taken up that involves CCOF and A Bee Organics.

For a hydroponic TR and/or task force, the subject of growing media and how growing media should be reviewed is likely to be an important issue. I have had previous correspondence with a few growing media manufacturers (although not with Oasis, the Horticubes manufacturer) and encouraged them to submit petitions. To date, we have not received a petition for any hydroponic growing media.

We may end up (b) (5)

Lynnea – I'll set up a time later this week to discuss.

Lisa

---

**From:** Gebault King, ReneeA - AMS  
**Sent:** Monday, September 08, 2014 12:55 PM  
**To:** Schurkamp, Lynnea - AMS; Brines, Lisa - AMS  
**Subject:** FW: Request for information: Horticubes and Rootcubes

FYI

---

**From:** Sarah Costin [<mailto:sarah@abeeorganic.com>]  
**Sent:** Thursday, September 04, 2014 4:54 PM  
**To:** Gebault King, ReneeA - AMS  
**Cc:** Ro Elgas  
**Subject:** Request for information: Horticubes and Rootcubes

Good afternoon Renée,

Attached is the summary of the decision making process regarding approval of Oasis® Horticubes® in organic hydroponic production. We have not reviewed Rootcubes or Rootcubes Plus.

Also attached are the Oasis® Safety Letter and the "Distinction between substances and materials in §205.2" document that we use when looking at materials.

I will be out of the office until 9/29/14 but will be answering e-mails should you need further information. Ro will be in the office and is well informed on this, so you could also call or e-mail her.

Best regards,  
Sarah  
Sarah Costin  
Co-Creator/Owner



A Bee Organic  
40707 Daily Road  
De Luz, CA 92028  
[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

## Schurkamp, Lynnea - AMS

---

**From:** Courtney, Cheri - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=COURTNEY, CHERID311097C-9075-4E08-8FF4-F74949B0F969>  
**Sent:** Wednesday, June 18, 2014 10:34 AM  
**To:** JonesKing, Stacy - AMS  
**Cc:** Mann, Renee - AMS  
**Subject:** FW: Rockwool Use n organic hyrdoponic production  
**Attachments:** Rockwool.docx

Hi Stacy,  
Can we please have STD's input on this issue.  
Thank you,  
*Cheri*

---

**From:** Mann, Renee - AMS  
**Sent:** Tuesday, June 17, 2014 4:54 PM  
**To:** Courtney, Cheri - AMS  
**Subject:** FW: Rockwool Use n organic hyrdoponic production

Hello Cheri –  
This is a certifier question I would like to forward to Standards.

QCS suggested that rockwool is synthetic and is clearly prohibited. They also insist this is a question regarding a material. They have good arguments, but ultimately, this is also a complicated policy issue. I don't know (b) (5)



I asked Ram to tell me which certifier disagrees with QCS's decision and to provide evidence. In the meantime, I would like to request that Standards review this issue, to at least get it on their radar.

Thanks,  
Renee

Ms. Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[NOP website](#)  
Sign up for our newsletter, the [USDA Organic Insider](#)

---

**From:** Ramkrishnan P.B. [<mailto:ram@gcsinfo.org>]  
**Sent:** Tuesday, June 17, 2014 3:17 PM  
**To:** Mann, Renee - AMS  
**Cc:** denise aguero  
**Subject:** Rockwool Use n organic hyrdoponic production

Renee,

QCS is seeking guidance of rockwool in hydroponics. QCS refused to allow rockwool to be a media for crop growth in hydroponic and come in contact with organic crop. Rockwool is a synthetic. The client switched to another certifier who allows rockwool for organic hydroponic production. We were advised by NOP that when certifiers disagree to bring it to NOP attention.

A guidance on whether rockwool is allowed or not will be helpful. Question attached.

Thanks,  
Ramkrishnan

## Schurkamp, Lynnea - AMS


---

**From:** Mann, Renee - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MANN, RENEE6BA41DDD-4FFB-41B9-9712-F7EF2E4B19ED>  
**Sent:** Tuesday, June 17, 2014 4:54 PM  
**To:** Courtney, Cheri - AMS  
**Subject:** FW: Rockwool Use n organic hyrdoponic production  
**Attachments:** Rockwool.docx

Hello Cheri –

This is a certifier question I would like to forward to Standards.

QCS suggested that rockwool is synthetic and is clearly prohibited. They also insist this is a question regarding a material. They have good arguments, but ultimately, this is also a complicated policy issue. I don't know (b) (5)



I asked Ram to tell me which certifier disagrees with QCS's decision and to provide evidence. In the meantime, I would like to request that Standards review this issue, to at least get it on their radar.

Thanks,  
Renee

Ms. Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[NOP website](#)  
Sign up for our newsletter, the [USDA Organic Insider](#)

---

**From:** Ramkrishnan P.B. [mailto:ram@qcsinfo.org]  
**Sent:** Tuesday, June 17, 2014 3:17 PM  
**To:** Mann, Renee - AMS  
**Cc:** denise aguero  
**Subject:** Rockwool Use n organic hyrdoponic production

Renee,

QCS is seeking guidance of rockwool in hydroponics. QCS refused to allow rockwool to be a media for crop growth in hydroponic and come in contact with organic crop. Rockwool is a synthetic. The client switched to another certifier who allows rockwool for organic hydroponic production. We were advised by NOP that when certifiers disagree to bring it to NOP attention.

A guidance on whether rockwool is allowed or not will be helpful. Question attached.

Thanks,  
Ramkrishnan

## Schurkamp, Lynnea - AMS

---

**From:** Mann, Renee - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MANN, RENEE6BA41DDD-4FFB-41B9-9712-F7EF2E4B19ED>  
**Sent:** Wednesday, June 18, 2014 5:41 PM  
**To:** Brines, Lisa - AMS  
**Cc:** Courtney, Cheri - AMS; JonesKing, Stacy - AMS  
**Subject:** FW: Rockwool Use n organic hyrdoponic production  
**Attachments:** Rockwool Use n organic hyrdoponic production .msg

Hello Lisa,

I would like to forward this issue to the Materials Team to consider, because it is two certifiers disagreeing about the use of rockwool. QCS disallowed rockwool in hydroponic iproduction and Ecocert allowed the material in hydroponic production. Attached is QCS's original question and below is QCS's explanation that Ecocert-IMO allows the material. Ultimately, I still think (b) (5)

<http://grodan101.com/knowledge-center/rockwool-growing-substrate-hydroponic-systems>.

Thank you,  
Renee

Ms. Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
**(202) 205-9643 - New phone number**  
[NOP website](#)  
Sign up for our newsletter, the [USDA Organic Insider](#)

---

**From:** Ramkrishnan P.B. [mailto:ram@qcsinfo.org]  
**Sent:** Wednesday, June 18, 2014 3:46 PM  
**To:** Mann, Renee - AMS  
**Cc:** 'denise aguero'  
**Subject:** RE: Rockwool Use n organic hyrdoponic production

Renee

ECOCERT-IMO. Client informed QCS they are switching because ECOCERT is allowing rockwool. QCS confirmed it via phone call between QCS and ECOCERT-IMO on June 16, 2014.

Our big picture here is to get a guidance from NOP whether rockwool would be allowed in Hydroponic/Aquaponics. This will create consistency and clients do not have to switch certifiers depending on who allows what.

A guidance would be much appreciated.

Thanks,  
Ramkrishnan

---

**From:** Mann, Renee - AMS [mailto:Renee.Mann@ams.usda.gov]  
**Sent:** Tuesday, June 17, 2014 4:51 PM

**To:** Ramkrishnan P.B.  
**Cc:** denise aguero  
**Subject:** RE: Rockwool Use n organic hyrdoponic production

Hello Ram:

Thank you for your inquiry. In order to process such a request, I need to know what other certifier you are in disagreement with and what evidence you have that they allow rockwool.

Thank you,  
Renee

Ms. Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[NOP website](#)  
Sign up for our newsletter, the [USDA Organic Insider](#)

---

**From:** Ramkrishnan P.B. [<mailto:ram@qcsinfo.org>]  
**Sent:** Tuesday, June 17, 2014 3:17 PM  
**To:** Mann, Renee - AMS  
**Cc:** denise aguero  
**Subject:** Rockwool Use n organic hyrdoponic production

Renee,

QCS is seeking guidance of rockwool in hydroponics. QCS refused to allow rockwool to be a media for crop growth in hydroponic and come in contact with organic crop. Rockwool is a synthetic. The client switched to another certifier who allows rockwool for organic hydroponic production. We were advised by NOP that when certifiers disagree to bring it to NOP attention.

A guidance on whether rockwool is allowed or not will be helpful. Question attached.

Thanks,  
Ramkrishnan

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## Schurkamp, Lynnea - AMS

---

**From:** Lopez, JasonJ - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=LOPEZ, JASONJ5418CFE5-681F-4992-82F0-2EC48A970563417>  
**Sent:** Wednesday, September 09, 2015 7:41 AM  
**To:** Gebault King, ReneeA - AMS  
**Subject:** FW: Technical Consultation  
**Attachments:** image001.png

Here is the email.

### *Jason Lopez*

Accreditation Manager  
USDA National Organic Program  
1400 Independence Ave, SW  
Room 2649- South, Stop 0268  
Washington, DC 20250-0268  
Office: (202)260-9445  
[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

---

**From:** Certificaciones [mailto:certificacion@certimexsc.com]  
**Sent:** Tuesday, September 08, 2015 2:36 PM  
**To:** Lopez, JasonJ - AMS  
**Subject:** RV: Technical Consultation

Jason estimated , again sending a technical consultation .

---

**De:** Certificaciones [mailto:certificacion@certimexsc.com]  
**Enviado el:** martes, 8 de septiembre de 2015 01:29 p. m.  
**Para:** 'Howley, JannaB - AMS' <[JannaB.Howley@ams.usda.gov](mailto:JannaB.Howley@ams.usda.gov)>  
**Asunto:** RE: Technical Consultation

Janna estimated , again sending a technical consultation .

1. What is “At Issue,” or your “Question”: Please state briefly, with no more than a few sentences, the issue or the question you wish answered. The producer of specialty produce (b) (4) small tomato / grape / round / red and yellow type , these tomatoes are produced in different parts of the republic ; San Isidro Mazatepec , Zapotlán , Colima and Nayarit Tuxcacuesco , the total area of (b) (4) ha The production system is now standard . ; greenhouses , drip irrigation and drip gray slab and pickaxe with coconut fiber substrate .
2. Relevant Standard(s): Please cite the relevant NOP standard(s), if applicable. Only it mentioned as well :

## Apéndice I

1. Los productos agrícolas producidos mediante el uso de nitrato de sodio no se deben vender ni comercializar como orgánicos en Canadá.
2. Los productos agrícolas producidos mediante métodos de producción hidropónica o aeropónica no se deben vender ni comercializar como orgánicos en Canadá.
3. Los productos agrícolas derivados de animales (con la excepción de los rumiantes) se deben producir de acuerdo con las densidades de población de ganado estipuladas en CAN/CGSB32.310-2006 (enmendada en octubre de 2008).

3. Background: Please provide us the context surrounding the issue and/or why this question is relevant. As much as possible, keep this section brief and on topic.

Our USA market is 95 % and 5 % between Canada and Mexico .

4. Proposed Solution(s): This is your opportunity to provide us valuable input and insight. Since you have a greater understanding of the specific circumstances, you may be better equipped to foresee and suggest a solution. Your solution should be supported by the information in the other sections.

Because to be produced under organic management in hydroponics .

5. Attachment(s): Relevant documents and/or links, if applicable. Attachments

6. Urgency: If you are facing a deadline or under a time constraint, please indicate this to me. If I have this information, I will be better able to prioritize your question(s). 11.09. 2015

Best regards

Ing. Rocío Pacheco García

Area de Revisión

Usuario Skype: rocio.cmx.cmx

CERTIMEX, Certificadora Mexicana de Productos y Procesos Ecológicos, S. C.

Calle 16 de Septiembre No. 204, Ejido Guadalupe Victoria,

Oaxaca de Juárez, Oax., México. C. P. 68026

Tel. / Fax. ++ 951 5202687 / ++ 951 52 00617/ ++951 1336113

Email. Gral. [certimex@certimexsc.com](mailto:certimex@certimexsc.com)

Pag. Web: [www.certimexsc.com](http://www.certimexsc.com)

Horarios de Atención:

Lunes a Viernes

9: 00 a.m. a 14:00 p.m.

15:00 p.m. a 17:00 p.m.

Acreditada

1. ISO-IEC 17065 (EN 45011) por el organismo Alemán de Acreditación DAkkS para certificar productos orgánicos para el mercado Nacional y Europa.
2. Departamento de Agricultura de los Estados Unidos (USDA-NOP) para certificar productos Orgánicos para el Mercado de Estados Unidos y Canadá.
3. MAFF-JAS (Ministerio de Agricultura, Silvicultura y Pesca) para certificar productos orgánicos para el mercado Japonés.
4. SAGARPA-SENASICA (Lineamientos para la Operación Orgánica de las Actividades Agropecuarias) para certificar productos orgánicos para el Mercado Nacional.
5. FUNDEPPO (SPP - Símbolo de Pequeños Productores) para el Mercado de Comercio Justo.

---

**From:** Certificaciones [<mailto:certificacion@certimexsc.com>]

**Sent:** Tuesday, August 04, 2015 10:17 AM

**To:** Howley, JannaB - AMS

**Subject:** Consultar a NOP

## Schurkamp, Lynnea - AMS

---

**From:** Baron , Anne - AMS on behalf of AMS - AIAinbox  
**Sent:** Tuesday, March 01, 2016 10:12 AM  
**To:** AMS - AIAinbox  
**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

---

**From:** Sarah Costin <sarah@abeeorganic.com>  
**Sent:** Friday, November 21, 2014 7:26 PM  
**To:** Courtney, Cheri - AMS; McEvoy, Miles - AMS  
**Cc:** Ro Elgas  
**Subject:** Letter regarding OASIS decision  
**Attachments:** image001.jpg; ABO-Letter regarding OASIS decision.pdf

Good afternoon Cheri,

I'm sending this letter to you because your signature is on the official notification regarding the decision on OASIS Horticultures and Rootcubes. I am copying Miles McEvoy because he is mentioned in the letter.

The OASIS decision is already adversely affecting our clients with vendors no longer purchasing products due to the perception that they are no longer certified organic.

A Bee Organic will send an official proposal to the AIA Inbox on or before December 3, 2014. Just to be clear, this letter is NOT that proposal.

Thank you for taking time to read the attached letter.

Sarah  
Sarah Costin  
Co-Creator/Owner



A Bee Organic  
40707 Daily Road  
De Luz, CA 92028  
[760-731-0155](tel:760-731-0155)

Link to the NOP regulations <http://bit.ly/NOPStandard-e>

A-7.1

## Specialized media for hydroponics seed germination

A low density, high-drainage foam, OASIS® *Horticulture*® growing medium is specifically engineered for hydroponics seed germination of vegetables and herbs. Growers will appreciate the simplicity this medium brings to the challenges of hydroponics production.

The excellent performance of *Horticulture* medium is based upon its unique cell structure which closely resembles the cellular structure of plants. This growing media is designed to drain off excess water from the base of the seed, allowing an optimal balance of oxygen and water, even when the foam is completely saturated.

*Horticulture* growing medium is sterile upon receipt and provides a clean start, pathogen-free, environment which reduces disease and insect problems for plant germination. All *Horticulture* media is manufactured in a "sheet" style that fits easily on a bench or into industry standard "1020" trays. Each sheet is pre-scored for easy removal of a single cube, block of cubes, or strip of cubes.

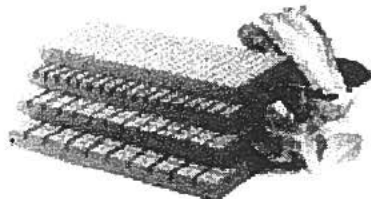


OASIS®  
**HORTICUBE®**  
Growing Medium

## Features and Benefits

From sowing to transplanting, *Horticulture* growing medium makes hydroponics an easy process. Growers benefit from:

- Simple to use – just add water and sow seeds
- High-drainage product characteristic is ideal for crops requiring high water usage
- Specially-engineered balance of water and air promotes vigorous root development
- Consistent product quality cell to cell
- Product cells do not compact after continual watering, maintaining the original air porosity
- Pre-dibbled holes make it easy to set the seed into place in the media
- Sterile sheets reduce disease problems



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APR 27 2012

BY: \_\_\_\_\_

 **OASIS**  
GROWER PRODUCTS

A-7.3

## PHENOLIC FOAM FOOD SAFETY STUDY

### EXECUTIVE SUMMARY

Phenolic foam plant growing or growth supporting medium is a synthetic substrate for soilless propagation of vegetative cuttings, raising of seedlings and growth of plants. The Oasis Grower Foam is a porous solid matrix based on phenol-formaldehyde chemistry. The foaming process starts with a liquid phenol-formaldehyde resin, to which a number of proprietary surfactants, colorants, inert ingredients and acid blend catalysts are added to manufacture a solid wettable foam product. Blowing agents are used to further "expand" the foam to produce a physical support structure for growing plants. Depending on the intended usage, the ingredients are added at different proportions to give desired characteristics.

One of the intended uses of the phenolic foam is for starting, supporting and/or growing certain food crops for human consumption such as lettuce, herbs, vegetables, rice, etc. The testing described in this report was commissioned by the Smithers-Oasis Company to evaluate the safety of the phenolic foam products as delivered to the customers (raw foam). This study had three major objectives: 1) determine if common pathogenic bacteria associated with foodborne illness may be present on the raw foam; 2) determine if the phenolic foam products have mutagenic properties that could be transferred to food plants grown on the products; and 3) determine if the foam products contain soluble organic compounds of potential concern related to the manufacturing process that could be translocated into plants grown on the foam.

The results of the tests performed as a part of this safety study are summarized below.

#### **Objective 1: Determine if Common Pathogenic Bacteria are Present in the Raw Foam**

Since the intended use of the phenolic foam products is to germinate/grow certain crops for human consumption, tests were conducted to determine if common bacteria indicative of fecal contamination and known to cause foodborne illnesses (i.e., *Escherichia coli*, *Salmonella* sp. and *Listeria monocytogenes*) may be present in the phenolic foam plant growing or growth supporting products-as manufactured and before being packaged and supplied to the customer.

*Tests conducted on the products indicated that these genera of bacteria were NOT present on the raw foam products immediately after manufacture.*

#### **Objective 2: Determine Potential Mutagenicity of the Products**

Standard protocol Ames Assays were performed on extracts from the phenolic foam plant growing or growth supporting products, and lettuce and rice plants grown on the products to screen for the presence of mutagens.

*The results of the Ames tests were negative, indicating that there are no mutagenic constituents in the phenolic foam products or in plants grown on those products. Since many (but not all)*

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APR 27 2012

BY: .....



A-7.4

*carcinogens are also mutagens, the Ames Assay results provide supporting evidence against the presence of carcinogenic compounds.*

**Objective 3: Determine if Soluble Chemicals of Potential Concern are Present**

The third objective was to determine if potentially toxic soluble chemicals of public health concern might be present in the phenolic foam plant growing or growth supporting products as supplied to the customer. Two screening methods were used to determine if chemicals related to the manufacture of the foam were likely to be present in the final products. Gas Chromatography – Mass Spectroscopy (GC-MS) was used to look for volatile organic compounds; and High Performance Liquid Chromatography (HPLC) was used to look for other compounds that are not readily detected by GC-MS methods. The HPLC method can also reveal the presence of some types of compounds produced by plants growing on the phenolic foam growing medium.

*GC-MS analysis of extracts from three different phenolic foam plant growing or growth supporting products and from lettuce and rice plants grown on those products did not detect the presence of volatile organic compounds of potential concern.*

*HPLC analysis of the phenolic foam plant growing or growth supporting products and from lettuce and rice plants grown on those products indicated the presence of low levels of surfactants and sulfonic acids used in making the products, and natural sugars and related compounds formed by the lettuce and rice plants.*

**Conclusion**

Based on the testing described in this report, it is concluded that when used as intended, the phenolic foam plant growing or growth supporting products do not pose a risk to the people who handle the foam or to people who eat food crops grown on the products.



**SMITHERS-OASIS COMPANY  
CORPORATE RESEARCH & DEVELOPMENT**

Date: 5/8/2014

Subject: OASIS® HORTICUBES®

Dear Dean,

OASIS® Growing Medium is an inert plastic foam container designed for the support of plant seedlings for germination and growing applications. The material is stable and considered as inert. The material is highly porous (99% porosity) with an extremely low bulk density (0.016 g/cc). Water flows readily into and out of this open celled foam.

With respect to certified organic growing practices, we have been requested to address the following:

1. That after a full growing cycle (from seedling to harvest), a plant tissue analysis be conducted to demonstrate that there are no traces of the material present in the crop tissue.
2. That the foam is inert – not adding or removing anything to the plant or environment
3. That the disposal of the foam matrix not pose an environmental concern

Please find attached the “Phenolic Foam Food Safety Study Report” in response to the above requests. The study demonstrates that the foam is an inert plastic and that, furthermore, no materials in the foam plastic translocate into plant tissue.

Best Regards,

Vijay Rapaka, PhD

Manager - Grower Research  
E-Mail: [vrapaka@smithersoasis.com](mailto:vrapaka@smithersoasis.com)

## Schurkamp, Lynnea - AMS

---

**From:** McElroy, Bridget - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MCELROY, BRID2CEA01B0-F300-4D5B-A8C2-106C55F5CCE466C>  
**Sent:** Thursday, March 03, 2016 4:22 PM  
**To:** Moutapam, Annette (Prüfinstitut LACON GmbH)  
**Subject:** RE: [CAUTION: Suspicious Link]WG: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Annette.

---

**From:** Moutapam, Annette (Prüfinstitut LACON GmbH) [mailto:a.moutapam@lacon-institut.org]  
**Sent:** Tuesday, March 01, 2016 11:12 AM  
**To:** McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
**Subject:** [CAUTION: Suspicious Link]WG: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

### [CAUTION: Suspicious Link]

The following message contains links to web content using **potentially** malicious URLs/links. Links structured like these are used in targeted phishing and malware attacks against USDA recipients.

Prior to trusting any links, please weigh the preceding warning by considering whether you are expecting the message below, along with a careful inspection of all links you may be considering following for spoofed or unexpected domains.

With all trusted links, and when practical, type URLs into a browser instead of clicking.

Questions: Contact Client Technology Services (CTS) via email at ([Spam.Abuse@wdc.usda.gov](mailto:Spam.Abuse@wdc.usda.gov))

Dear Bridget

Further to your message below please find the following answers on behalf of LACON GmbH, Germany:

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **No**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **None**

In what state or country (if international) are the certified operations located (list)? **None**

What crops do these certified operations produce (list)? **None**

Best regards,  
Annette Moutapam

Mit freundlichen Grüßen

Annette Moutapam  
Team International

Telefon +49 (0) 781 96679-242  
Telefax +49 (0) 781 96679-300  
Mobil +(b) (6)  
[a.moutapam@lacon-institut.org](mailto:a.moutapam@lacon-institut.org)  
[www.lacon-institut.com](http://www.lacon-institut.com)

Prüfinstitut LACON GmbH, Zentrale Offenburg, Moltkestr. 4, 77654 Offenburg  
HRB 471342 Amtsgericht Freiburg  
Geschäftsführung: Dr. H.-Joachim Kopp, Jürgen Schwarz

#### Audits und Zertifizierungen:

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**Von:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **Im Auftrag von** AMS - AIAinbox

**Gesendet:** Dienstag, 1. März 2016 16:12

**An:** AMS - AIAinbox

**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); 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**Betreff:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

#### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

#### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MCELROY, BRID2CEA01B0-F300-4D5B-A8C2-106C55F5CCE466C>  
**Sent:** Friday, April 01, 2016 10:51 AM  
**To:** michelle.menken@mncia.org  
**Subject:** RE: aquaponic/hydroponic  
**Attachments:** image001.png; image002.png

Thank you Michelle!

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**From:** Michelle Menken [mailto:michelle.menken@mncia.org]  
**Sent:** Wednesday, March 23, 2016 4:19 PM  
**To:** McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
**Subject:** aquaponic/hydroponic

Hello Bridget,

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **Yes**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **We have two certified operations- one aquaponics and one hydroponic.**

In what state or country (if international) are the certified operations located (list)? **Both are in Minnesota.**

What crops do these certified operations produce (list)? **Here are the crop lists off the two certificates:**

#### **100% Organic Production**

**Products:** Aquaponic production of Arugula; Basil; Chard; Cilantro; Kale; Lettuce; Mint; Pak choi; Parsley; Rosemary; Spinach; Tatsoi; Thyme; and Watercress

#### **100% Organic Production**

**Processes:** Growing in hydroponic system and packaging  
**Products:** Arugula; Basil; Bay leaves; Chervil; Chives; Cilantro; Dill; Lavender; Lemongrass; Marjoram; Mint; Oregano; Parsley; Sage; Savory; Sorrel; Tarragon; Thyme; Thyme (lemon); and Watercress

Yours truly,

Michelle Menken  
Organic Program

Minnesota Crop Improvement Association/MCIA

1-855-213-4461

612-625-3123 (direct)

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MCELROY, BRID2CEA01B0-F300-4D5B-A8C2-106C55F5CCE466C>  
**Sent:** Thursday, March 03, 2016 4:24 PM  
**To:** Gwendal Bellocq - IBD Certificações  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production System\_01032016  
**Attachments:** image001.gif; image007.jpg; image008.png; image002.jpg; image003.jpg

Thank you, Gwendal.

### Bridget McElroy

Policy Analyst  
USDA National Organic Program  
1400 Independence Ave. SW  
Room 2646-S. (Stop 0268)  
Washington, D.C. 20205

(202) 260-9288

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**From:** Gwendal Bellocq - IBD Certificações [mailto:gwendal@ibd.com.br]  
**Sent:** Tuesday, March 01, 2016 11:59 AM  
**To:** McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production System\_01032016

Dear Bridget McElroy,

As requested please see IBD's answer below:

- Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **NO.**
- If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **NONE**
- In what state or country (if international) are the certified operations located (list)? **NO ONE**
- What crops do these certified operations produce (list)? **NONE**

I remain at your service for any further question you may have.

Best regards.

Gwendal Bellocq



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**De:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **Em nome de** AMS - AIAinbox

**Enviada em:** terça-feira, 1 de março de 2016 12:12

**Para:** AMS - AIAinbox

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**Assunto:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)

- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MCELROY, BRID2CEA01B0-F300-4D5B-A8C2-106C55F5CCE466C>  
**Sent:** Tuesday, April 05, 2016 1:29 PM  
**To:** Emily Garcia  
**Cc:** PrimusOrganic; AuditQA  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**Attachments:** image001.jpg; image002.jpg

Hello Emily,

Thank you again for sharing your information regarding certification of hydroponic production. As we go through the results, we are realizing that it would be helpful to have slightly more detailed information from certifiers in an effort to differentiate between production that is more clearly hydroponic and production which falls more under "container" production. We know that the systems out there are quite diverse and the continuum from in ground, to container, to hydroponic production can make it challenging to know where to draw the line. For this survey, it would simply be helpful to know how many of the operations that you are certifying are:

1. Systems like NFT, raft, ebb and flow (hydroponic)
2. Systems like pots, upright bags, Dutch bucket ("container")
3. And systems that fall under #1 but use fish waste for fertility (aquaponics)

Among the 28 operations that you are certifying, would you consider them all to be hydroponic and aquaponic, or are some closer to container production?

Regards,

**Bridget McElroy**

Policy Analyst  
USDA National Organic Program  
1400 Independence Ave. SW  
Room 2646-S. (Stop 0268)  
Washington, D.C. 20205

(202) 260-9288

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**From:** Emily Garcia [mailto:Emily.Garcia@primusauditingops.com]  
**Sent:** Friday, March 11, 2016 1:48 PM  
**To:** McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
**Cc:** PrimusOrganic <PrimusOrganic@primuslabs.com>; AuditQA <auditqa@primusauditingops.com>  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget,

Please see Primus Labs responses in **Red**:

1. Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **Yes, we certify hydroponic operations**
2. If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **28**
3. In what state or country (if international) are the certified operations located (list)?  
**California**  
**Mexico**
4. What crops do these certified operations produce (list)?  
**Raspberries**  
**Blueberries**  
**Butter lettuce**

Let me know if you have any questions.

Best,



**Emily Garcia**  
QA Specialist  
[Emily.Garcia@primusauditingops.com](mailto:Emily.Garcia@primusauditingops.com)  
Office 805.631.5248 | Direct Line 805.623.5542  
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**From:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **On Behalf Of** AMS - AIAinbox  
**Sent:** Tuesday, March 01, 2016 7:12 AM  
**To:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>  
**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); Koble, Clinton - FSA, Reno, NV <[clinton.koble@nv.usda.gov](mailto:clinton.koble@nv.usda.gov)>; [emel.erkon@bio-inspecta.com](mailto:emel.erkon@bio-inspecta.com); [central@biolatina.com](mailto:central@biolatina.com); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); [amalia.rueda@bioagricert.org](mailto:amalia.rueda@bioagricert.org); [admin@bio-inspecta.ch](mailto:admin@bio-inspecta.ch); [central@biolatina.com](mailto:central@biolatina.com); [Pat.Kennelly@cdph.ca.gov](mailto:Pat.Kennelly@cdph.ca.gov); [info@bioagricert.org](mailto:info@bioagricert.org); [julia.winter@bio-inspecta.ch](mailto:julia.winter@bio-inspecta.ch); [accreditation@ccof.org](mailto:accreditation@ccof.org); [Bolicert@megalink.com](mailto:Bolicert@megalink.com); [riccardo.cozzo@bioagricert.org](mailto:riccardo.cozzo@bioagricert.org); [calidad@certimexsc.com](mailto:calidad@certimexsc.com); [rporto@caae.es](mailto:rporto@caae.es); [Bolicert@bolicert.org](mailto:Bolicert@bolicert.org); [tom.nizet@certisys.eu](mailto:tom.nizet@certisys.eu); [ccof@ccof.org](mailto:ccof@ccof.org); [rporto@caae.es](mailto:rporto@caae.es); [saltmn@clemson.edu](mailto:saltmn@clemson.edu); [ccpb@ccpb.it](mailto:ccpb@ccpb.it); [Danny.Lee@cdfa.ca.gov](mailto:Danny.Lee@cdfa.ca.gov); [mitchell.yergert@state.co.us](mailto:mitchell.yergert@state.co.us); [certimex@certimexsc.com](mailto:certimex@certimexsc.com); Lewin Jake-FASConatct <[jake@ccof.org](mailto:jake@ccof.org)>; [jvdschootbrugge@controlunion.com](mailto:jvdschootbrugge@controlunion.com); [ceres@ceres-cert.com](mailto:ceres@ceres-cert.com); [rsetti@ccpb.it](mailto:rsetti@ccpb.it); [vincent.morel@ecocert.com](mailto:vincent.morel@ecocert.com); [info@certisys.eu](mailto:info@certisys.eu); [direccionejecutiva@certimexsc.com](mailto:direccionejecutiva@certimexsc.com); [agroecologiauna@gmail.com](mailto:agroecologiauna@gmail.com); [organic@clemson.edu](mailto:organic@clemson.edu); [benzing@ceres-cert.com](mailto:benzing@ceres-cert.com); [mefraga@foodsafety.com.ar](mailto:mefraga@foodsafety.com.ar); [amy.stafford@state.co.us](mailto:amy.stafford@state.co.us); [Nathalie.Boes@certisys.eu](mailto:Nathalie.Boes@certisys.eu); [joy.mccracken@georgiacrop.com](mailto:joy.mccracken@georgiacrop.com); [organic@controlunion.com](mailto:organic@controlunion.com); [organic@clemson.edu](mailto:organic@clemson.edu);



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**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media

for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MCELROY, BRID2CEA01B0-F300-4D5B-A8C2-106C55F5CCE466C>  
**Sent:** Thursday, March 17, 2016 4:04 PM  
**To:** Nune Darbinjan  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Dr. Darbinyan!

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**From:** Nune Darbinjan [mailto:(b) (6)@yahoo.com]  
**Sent:** Wednesday, March 09, 2016 1:44 AM  
**To:** AMS - AIAinbox <AIAinbox@ams.usda.gov>; Nune Darbinjan (b) (6)@yahoo.com>; McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
**Subject:** Re: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear NOP,

I would like to inform you that ECOGLOBE (EGLO) does not certify any hydroponic, aquaponic, aeroponic.

We are especially interested in any instruction and new approaches to this technologies by the NOP.

*Best regards, Ms. Nune Darbinyan*

*Liebe Grüße, Frau Nune Darbinyan*

**Dr. Nune Darbinyan**  
**General Director**  
**ECOGLOBE**

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**Sent:** Tuesday, March 1, 2016 6:11 PM

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Sam Welsch <sam@onecert.com>  
**Sent:** Friday, March 04, 2016 7:13 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** Re: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thanks. I hope you get prompt response from all ACAs.

Sam Welsch, President  
OneCert, Inc.  
2219 C Street  
Lincoln, NE 68502  
402-420-6080  
[www.onecert.com](http://www.onecert.com)

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On Thu, Mar 3, 2016 at 2:16 PM, McElroy, Bridget - AMS <[Bridget.McElroy@ams.usda.gov](mailto:Bridget.McElroy@ams.usda.gov)> wrote:

Thanks, Sam. It shouldn't take too long. Maybe a week just to give a little time for late submissions.

Bridget

**From:** Sam Welsch [mailto:[sam@onecert.com](mailto:sam@onecert.com)]  
**Sent:** Thursday, March 03, 2016 6:54 AM  
**To:** McElroy, Bridget - AMS <[Bridget.McElroy@ams.usda.gov](mailto:Bridget.McElroy@ams.usda.gov)>  
**Cc:** OneCert Info <[info@onecert.com](mailto:info@onecert.com)>  
**Subject:** Fwd: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Bridget,

As you are already aware, OneCert does not certify hydroponic, aeroponic or aquaponic operations.

How soon after March 11 do you expect to have a summary of this information available to the hydroponics task force?

Thanks,

Sam Welsch, President  
OneCert, Inc.  
2219 C Street  
Lincoln, NE 68502  
402-420-6080

[www.onecert.com](http://www.onecert.com)

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----- Forwarded message -----

From: **AMS - AIAinbox** <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>

Date: Tue, Mar 1, 2016 at 9:11 AM

Subject: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

To: AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>

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This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media.



This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,

Cheri Courtney

Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Rendon, Iris <irendon@gftc.ca>  
**Sent:** Monday, March 21, 2016 9:49 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you for confirming receipt.  
Best regards,

### Iris Rendon

Quality Specialist  
NSF International - Canada  
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**From:** McElroy, Bridget - AMS [mailto:[Bridget.McElroy@ams.usda.gov](mailto:Bridget.McElroy@ams.usda.gov)]  
**Sent:** March-17-16 4:20 PM  
**To:** Rendon, Iris  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hi Iris,

I am going through a whole lot of emails in the order that they came in, so I didn't see your second one until now. I will use this updated information.

Thank you again for your help.

Bridget

---

**From:** Rendon, Iris [mailto:[irendon@gftc.ca](mailto:irendon@gftc.ca)]  
**Sent:** Thursday, March 10, 2016 4:12 PM  
**To:** McElroy, Bridget - AMS <[Bridget.McElroy@ams.usda.gov](mailto:Bridget.McElroy@ams.usda.gov)>  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello,  
I had submitted a response to this inquiry earlier, however, some corrections have been made by the technical team. Please accept this response and disregard the previous email on this subject.  
Thank you and best regards.

## Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **Yes**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **Eight, however, please see attachment with comments. You may arrive at a different conclusion.**

In what state or country (if international) are the certified operations located (list)? **See attached.**

What crops do these certified operations produce (list)? **See attached.**

## **Iris Rendon**

Quality Specialist

NSF International - Canada

☎ (+1) 519-821-1246 ext. 5059

✉ [irendon@nsf.org](mailto:irendon@nsf.org)

🌐 [www.nsf.org](http://www.nsf.org)

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---

**From:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **On Behalf Of** AMS - AIAinbox

**Sent:** March-01-16 10:12 AM

**To:** AMS - AIAinbox

**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); Koble, Clinton - FSA, Reno, NV; [emel.erkhan@bio-inspecta.com](mailto:emel.erkhan@bio-inspecta.com); [central@biolatina.com](mailto:central@biolatina.com); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); [amalia.rueda@bioagricert.org](mailto:amalia.rueda@bioagricert.org); [admin@bio-inspecta.ch](mailto:admin@bio-inspecta.ch); [central@biolatina.com](mailto:central@biolatina.com); [Pat.Kennelly@cdph.ca.gov](mailto:Pat.Kennelly@cdph.ca.gov); [info@bioagricert.org](mailto:info@bioagricert.org); [julia.winter@bio-inspecta.ch](mailto:julia.winter@bio-inspecta.ch); [accreditation@ccof.org](mailto:accreditation@ccof.org); [Bolicert@megalink.com](mailto:Bolicert@megalink.com); [riccardo.cozzo@bioagricert.org](mailto:riccardo.cozzo@bioagricert.org); [calidad@certimexsc.com](mailto:calidad@certimexsc.com); [rporto@caae.es](mailto:rporto@caae.es); [Bolicert@bolicert.org](mailto:Bolicert@bolicert.org); [tom.nizet@certisys.eu](mailto:tom.nizet@certisys.eu); [ccof@ccof.org](mailto:ccof@ccof.org); [rporto@caae.es](mailto:rporto@caae.es); [saltmn@clemson.edu](mailto:saltmn@clemson.edu); [ccpb@ccpb.it](mailto:ccpb@ccpb.it); [Danny.Lee@cdfa.ca.gov](mailto:Danny.Lee@cdfa.ca.gov); [mitchell.yergert@state.co.us](mailto:mitchell.yergert@state.co.us); [certimex@certimexsc.com](mailto:certimex@certimexsc.com); Lewin Jake-FASConatct; [jvdschootbrugge@controlunion.com](mailto:jvdschootbrugge@controlunion.com); [ceres@ceres-cert.com](mailto:ceres@ceres-cert.com); [rsetti@ccpb.it](mailto:rsetti@ccpb.it); [vincent.morel@ecocert.com](mailto:vincent.morel@ecocert.com); [info@certisys.eu](mailto:info@certisys.eu); [direccionejecutiva@certimexsc.com](mailto:direccionejecutiva@certimexsc.com); [agroecologiauna@gmail.com](mailto:agroecologiauna@gmail.com); [organic@clemson.edu](mailto:organic@clemson.edu); [benzing@ceres-cert.com](mailto:benzing@ceres-cert.com); [mefraga@foodsafety.com.ar](mailto:mefraga@foodsafety.com.ar); [amy.stafford@state.co.us](mailto:amy.stafford@state.co.us); [Nathalie.Boes@certisys.eu](mailto:Nathalie.Boes@certisys.eu); [joy.mccracken@georgiacrop.com](mailto:joy.mccracken@georgiacrop.com); [organic@controlunion.com](mailto:organic@controlunion.com); [organic@clemson.edu](mailto:organic@clemson.edu); [cvanhook77@earthlink.net](mailto:cvanhook77@earthlink.net); [info.ecocertico@ecocert.com](mailto:info.ecocertico@ecocert.com); [amy.stafford@state.co.us](mailto:amy.stafford@state.co.us); [goabecky@centurylink.net](mailto:goabecky@centurylink.net); [aude.bonnet@ecocert.com](mailto:aude.bonnet@ecocert.com); [dszalai@controlunion.com](mailto:dszalai@controlunion.com); [camila@ibd.com.br](mailto:camila@ibd.com.br); [ep@ecoglobe.am](mailto:ep@ecoglobe.am); [Jeffry.EVARD@ecocert.com](mailto:Jeffry.EVARD@ecocert.com); [Jason.Laney@agri.idaho.gov](mailto:Jason.Laney@agri.idaho.gov); [pdescamps@eco-logica.com](mailto:pdescamps@eco-logica.com); [aude.bonnet@ecocert.com](mailto:aude.bonnet@ecocert.com); [Beatrice.Breuer@imo.ch](mailto:Beatrice.Breuer@imo.ch); 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[rlarsen@utah.gov](mailto:rlarsen@utah.gov); [Nicole@nofavt.org](mailto:Nicole@nofavt.org); [bbook@agr.wa.gov](mailto:bbook@agr.wa.gov); [dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MCELROY, BRID2CEA01B0-F300-4D5B-A8C2-106C55F5CCE466C>  
**Sent:** Monday, March 14, 2016 9:09 AM  
**To:** Mann, Renee - AMS  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Good morning Renee,

So, I (b) (5)



Let me know what you think is the best thing to do. Thanks again to AIA for the help on this!

Bridget

---

**From:** Mann, Renee - AMS  
**Sent:** Tuesday, March 01, 2016 11:00 AM  
**To:** McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

It went to the 80 accredited certifiers, and the California State Organic Program (so they know what we're asking of the certifiers).

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

---

**From:** McElroy, Bridget - AMS  
**Sent:** Tuesday, March 01, 2016 10:55 AM  
**To:** Mann, Renee - AMS <[Renee.Mann@ams.usda.gov](mailto:Renee.Mann@ams.usda.gov)>  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Oh, how many ACAs total did it go to?

---

**From:** Mann, Renee - AMS  
**Sent:** Tuesday, March 01, 2016 10:35 AM  
**To:** McElroy, Bridget - AMS <[Bridget.McElroy@ams.usda.gov](mailto:Bridget.McElroy@ams.usda.gov)>  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

FYI

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

---

**From:** Baron , Anne - AMS

**Sent:** Tuesday, March 01, 2016 10:29 AM

**To:** Courtney, Cheri - AMS <[Cheri.Courtney@ams.usda.gov](mailto:Cheri.Courtney@ams.usda.gov)>; Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>; Gebault King, ReneeA - AMS <[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)>; Lopez, JasonJ - AMS <[JasonJ.Lopez@ams.usda.gov](mailto:JasonJ.Lopez@ams.usda.gov)>; Lusby, MaryLou - AMS <[MaryLou.Lusby@ams.usda.gov](mailto:MaryLou.Lusby@ams.usda.gov)>; Mann, Renee - AMS <[Renee.Mann@ams.usda.gov](mailto:Renee.Mann@ams.usda.gov)>; Yang, RobertH - AMS <[RobertH.Yang@ams.usda.gov](mailto:RobertH.Yang@ams.usda.gov)>; Zuck, Penelope - AMS <[Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)>; Adams, Edith - AMS <[Edith.Adams@ams.usda.gov](mailto:Edith.Adams@ams.usda.gov)>; Caceres, Miguel - AMS <[Miguel.Caceres@ams.usda.gov](mailto:Miguel.Caceres@ams.usda.gov)>; Friesenhahn, Martin - AMS <[Martin.Friesenhahn@ams.usda.gov](mailto:Martin.Friesenhahn@ams.usda.gov)>; Gilbert, Corey - AMS <[Corey.Gilbert@ams.usda.gov](mailto:Corey.Gilbert@ams.usda.gov)>; Heckart, Patricia - AMS <[Patricia.Heckart@ams.usda.gov](mailto:Patricia.Heckart@ams.usda.gov)>; Hildreth, David - AMS <[David.Hildreth@ams.usda.gov](mailto:David.Hildreth@ams.usda.gov)>; Horne, Willy - AMS <[Willy.Horne@ams.usda.gov](mailto:Willy.Horne@ams.usda.gov)>; Kohles, Alan - AMS <[Alan.Kohles@ams.usda.gov](mailto:Alan.Kohles@ams.usda.gov)>; Lopez, Mike - AMS <[Mike.Lopez@ams.usda.gov](mailto:Mike.Lopez@ams.usda.gov)>; Matejovsky, Kathryn - AMS <[Kathryn.Matejovsky@ams.usda.gov](mailto:Kathryn.Matejovsky@ams.usda.gov)>; Ross, Steve - AMS <[Steve.Ross@ams.usda.gov](mailto:Steve.Ross@ams.usda.gov)>; Schoop, Jamie - AMS <[Jamie.Schoop@ams.usda.gov](mailto:Jamie.Schoop@ams.usda.gov)>; Skinner, Rick - AMS <[Rick.Skinner@ams.usda.gov](mailto:Rick.Skinner@ams.usda.gov)>; Wilson, Darrell - AMS <[Darrell.Wilson@ams.usda.gov](mailto:Darrell.Wilson@ams.usda.gov)>; Gebel, Kelley - AMS <[Kelley.Gebel@ams.usda.gov](mailto:Kelley.Gebel@ams.usda.gov)>; McEvoy, Miles - AMS <[Miles.McEvoy@ams.usda.gov](mailto:Miles.McEvoy@ams.usda.gov)>; Tucker, Jennifer - AMS <[Jennifer.Tucker@ams.usda.gov](mailto:Jennifer.Tucker@ams.usda.gov)>; Nelson, Kristen - AMS <[Kristen.Nelson@ams.usda.gov](mailto:Kristen.Nelson@ams.usda.gov)>; Lewis, Paul I - AMS <[Paull.Lewis@ams.usda.gov](mailto:Paull.Lewis@ams.usda.gov)>; Holmes, Vella - AMS <[Vella.Holmes@ams.usda.gov](mailto:Vella.Holmes@ams.usda.gov)>; Michael, Matthew - AMS <[Matthew.Michael@ams.usda.gov](mailto:Matthew.Michael@ams.usda.gov)>; [andy@oeffa.org](mailto:andy@oeffa.org)

**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear AIA staff, NOP Management Team and QAD auditors,

Please find below the message sent to the certifiers.  
Let us know if you have any questions.

Regards,  
Alvik Joseph

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**From:** Baron , Anne - AMS **On Behalf Of** AMS - AIAinbox

**Sent:** Tuesday, March 01, 2016 10:12 AM

**To:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>

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'dennis.chambers@yolocounty.org' <[dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)>; '(b) (6) @gmail.com' <(b) (6) @gmail.com>; 'rlarsen@utah.gov' <[rlarsen@utah.gov](mailto:rlarsen@utah.gov)>; 'Nicole@nofavt.org' <[Nicole@nofavt.org](mailto:Nicole@nofavt.org)>; 'bbook@agr.wa.gov' <[bbook@agr.wa.gov](mailto:bbook@agr.wa.gov)>; 'dennis.chambers@yolocounty.org' <[dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)>

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MCELROY, BRID2CEA01B0-F300-4D5B-A8C2-106C55F5CCE466C>  
**Sent:** Tuesday, March 01, 2016 10:37 AM  
**To:** Mann, Renee - AMS  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you! I've already received a couple of responses.

Bridget

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**From:** Mann, Renee - AMS  
**Sent:** Tuesday, March 01, 2016 10:35 AM  
**To:** McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

FYI

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

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**From:** Baron , Anne - AMS  
**Sent:** Tuesday, March 01, 2016 10:29 AM  
**To:** Courtney, Cheri - AMS <[Cheri.Courtney@ams.usda.gov](mailto:Cheri.Courtney@ams.usda.gov)>; Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>; Gebault King, ReneeA - AMS <[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)>; Lopez, JasonJ - AMS <[JasonJ.Lopez@ams.usda.gov](mailto:JasonJ.Lopez@ams.usda.gov)>; Lusby, MaryLou - AMS <[MaryLou.Lusby@ams.usda.gov](mailto:MaryLou.Lusby@ams.usda.gov)>; Mann, Renee - AMS <[Renee.Mann@ams.usda.gov](mailto:Renee.Mann@ams.usda.gov)>; Yang, RobertH - AMS <[RobertH.Yang@ams.usda.gov](mailto:RobertH.Yang@ams.usda.gov)>; Zuck, Penelope - AMS <[Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)>; Adams, Edith - AMS <[Edith.Adams@ams.usda.gov](mailto:Edith.Adams@ams.usda.gov)>; Caceres, Miguel - AMS <[Miguel.Caceres@ams.usda.gov](mailto:Miguel.Caceres@ams.usda.gov)>; Friesenhahn, Martin - AMS <[Martin.Friesenhahn@ams.usda.gov](mailto:Martin.Friesenhahn@ams.usda.gov)>; Gilbert, Corey - AMS <[Corey.Gilbert@ams.usda.gov](mailto:Corey.Gilbert@ams.usda.gov)>; Heckart, Patricia - AMS <[Patricia.Heckart@ams.usda.gov](mailto:Patricia.Heckart@ams.usda.gov)>; Hildreth, David - AMS <[David.Hildreth@ams.usda.gov](mailto:David.Hildreth@ams.usda.gov)>; Horne, Willy - AMS <[Willy.Horne@ams.usda.gov](mailto:Willy.Horne@ams.usda.gov)>; Kohles, Alan - AMS <[Alan.Kohles@ams.usda.gov](mailto:Alan.Kohles@ams.usda.gov)>; Lopez, Mike - AMS <[Mike.Lopez@ams.usda.gov](mailto:Mike.Lopez@ams.usda.gov)>; Matejovsky, Kathryn - AMS <[Kathryn.Matejovsky@ams.usda.gov](mailto:Kathryn.Matejovsky@ams.usda.gov)>; Ross, Steve - AMS <[Steve.Ross@ams.usda.gov](mailto:Steve.Ross@ams.usda.gov)>; Schoop, Jamie - AMS <[Jamie.Schoop@ams.usda.gov](mailto:Jamie.Schoop@ams.usda.gov)>; Skinner, Rick - AMS <[Rick.Skinner@ams.usda.gov](mailto:Rick.Skinner@ams.usda.gov)>; Wilson, Darrell - AMS <[Darrell.Wilson@ams.usda.gov](mailto:Darrell.Wilson@ams.usda.gov)>; Gebel, Kelley - AMS <[Kelley.Gebel@ams.usda.gov](mailto:Kelley.Gebel@ams.usda.gov)>; McEvoy, Miles - AMS <[Miles.McEvoy@ams.usda.gov](mailto:Miles.McEvoy@ams.usda.gov)>; Tucker, Jennifer - AMS <[Jennifer.Tucker@ams.usda.gov](mailto:Jennifer.Tucker@ams.usda.gov)>; Nelson, Kristen - AMS <[Kristen.Nelson@ams.usda.gov](mailto:Kristen.Nelson@ams.usda.gov)>; Lewis, Paul I - AMS <[Paull.Lewis@ams.usda.gov](mailto:Paull.Lewis@ams.usda.gov)>; Holmes, Vella - AMS <[Vella.Holmes@ams.usda.gov](mailto:Vella.Holmes@ams.usda.gov)>; Michael, Matthew - AMS <[Matthew.Michael@ams.usda.gov](mailto:Matthew.Michael@ams.usda.gov)>; [andy@oeffa.org](mailto:andy@oeffa.org)  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear AIA staff, NOP Management Team and QAD auditors,

Please find below the message sent to the certifiers.  
Let us know if you have any questions.



Regards,  
Alvik Joseph

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**From:** Baron , Anne - AMS On Behalf Of AMS - AIAinbox

**Sent:** Tuesday, March 01, 2016 10:12 AM

**To:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>

**Cc:** 'admin@abeeorganic.com' <[admin@abeeorganic.com](mailto:admin@abeeorganic.com)>; 'sarah@abeeorganic.com' <[sarah@abeeorganic.com](mailto:sarah@abeeorganic.com)>; 'ro@abeeorganic.com' <[ro@abeeorganic.com](mailto:ro@abeeorganic.com)>; 'info@ascorganic.com' <[info@ascorganic.com](mailto:info@ascorganic.com)>; 'Kat@ascorganic.com' <[Kat@ascorganic.com](mailto:Kat@ascorganic.com)>; 'mfigueiras@argencert.com.ar' <[mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar)>; 'americert@gmail.com' <[americert@gmail.com](mailto:americert@gmail.com)>; 'americert@gmail.com' <[americert@gmail.com](mailto:americert@gmail.com)>; 'organic@ausmeat.com.au' <[organic@ausmeat.com.au](mailto:organic@ausmeat.com.au)>; 'info@argencert.com.ar' <[info@argencert.com.ar](mailto:info@argencert.com.ar)>; 'lmontenegro@argencert.com.ar' <[lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar)>; 'jorge.larranaga@aco.net.au' <[jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au)>; 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**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

#### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

#### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division



## Schurkamp, Lynnea - AMS

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**From:** Nune Darbinjan (b) (6) @yahoo.com>  
**Sent:** Wednesday, March 09, 2016 1:44 AM  
**To:** AMS - AIAinbox; Nune Darbinjan; McElroy, Bridget - AMS  
**Subject:** Re: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear NOP,

I would like to inform you that ECOGLOBE (EGLO) does not certify any hydroponic, aquaponic, aeroponic.

We are especially interested in any instruction and new approaches to this technologies by the NOP.

*Best regards, Ms. Nune Darbinyan  
Liebe Grüße, Frau Nune Darbinyan*

**Dr. Nune Darbinyan**  
**General Director**  
**ECOGLOBE**

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***Mind about environment before printing!***

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"direccionejecutiva@certimexsc.com" <direccionejecutiva@certimexsc.com>; "agroecologiauna@gmail.com" <agroecologiauna@gmail.com>; "organic@clemson.edu" <organic@clemson.edu>; "benzing@ceres-cert.com" <benzing@ceres-cert.com>; "mefraga@foodsafety.com.ar" <mefraga@foodsafety.com.ar>; "amy.stafford@state.co.us" <amy.stafford@state.co.us>; "Nathalie.Boes@certisys.eu" <Nathalie.Boes@certisys.eu>; "joy.mccracken@georgiacrop.com" <joy.mccracken@georgiacrop.com>; "organic@controlunion.com" <organic@controlunion.com>; "organic@clemson.edu" <organic@clemson.edu>; "cvanhook77@earthlink.net" <cvanhook77@earthlink.net>; "info.ecocertico@ecocert.com" <info.ecocertico@ecocert.com>; "amy.stafford@state.co.us" <amy.stafford@state.co.us>; "goabecky@centurylink.net" <goabecky@centurylink.net>; "aude.bonnet@ecocert.com" <aude.bonnet@ecocert.com>; "dszalai@controlunion.com" <dszalai@controlunion.com>; "camila@ibd.com.br" <camila@ibd.com.br>; "ep@ecoglobe.am" <ep@ecoglobe.am>; "Jeffry.EVARD@ecocert.com" <Jeffry.EVARD@ecocert.com>; "Jason.Laney@agri.idaho.gov" <Jason.Laney@agri.idaho.gov>; "pdescamps@eco-logica.com" <pdescamps@eco-logica.com>; "aude.bonnet@ecocert.com" <aude.bonnet@ecocert.com>; "Beatrice.Breuer@imo.ch" <Beatrice.Breuer@imo.ch>; "info@etko.org" <info@etko.org>; "nd@ecoglobe.am" <nd@ecoglobe.am>; "Mary.nieland@iowaagriculture.gov" <Mary.nieland@iowaagriculture.gov>; "foodsafety@foodsafety.com.ar" <foodsafety@foodsafety.com.ar>; "pdescamps@eco-logica.com" <pdescamps@eco-logica.com>; "p.perrone@icea.info" <p.perrone@icea.info>; "terry.hollifield@georgiacrop.com" <terry.hollifield@georgiacrop.com>; "ma@etko.org" <ma@etko.org>; "Kristen.Branscum@ky.gov" <Kristen.Branscum@ky.gov>; "info@globalculture.us" <info@globalculture.us>; "calidad@foodsafety.com.ar" <calidad@foodsafety.com.ar>; "herr@bcs-oeko.de" <herr@bcs-oeko.de>; "goaorg@centurylink.net" <goaorg@centurylink.net>; "terry.hollifield@georgiacrop.com" <terry.hollifield@georgiacrop.com>; "a.moutapam@lacon-institut.org" <a.moutapam@lacon-institut.org>; "lbd@lbd.com.br" <lbd@lbd.com.br>; "globalculture@earthlink.net" <globalculture@earthlink.net>; "monica@letis.org" <monica@letis.org>; "Johanna.Phillips@agri.idaho.gov" <Johanna.Phillips@agri.idaho.gov>; "goaorg@centurylink.net" <goaorg@centurylink.net>; "scarlsen@co.marin.ca.us" <scarlsen@co.marin.ca.us>; "imo@imo.ch" <imo@imo.ch>; "gwendal@ibd.com.br" <gwendal@ibd.com.br>; "juanantonio.mendoza@mayacert.com" <juanantonio.mendoza@mayacert.com>; "info@ics-intl.com" <info@ics-intl.com>; "Johanna.Phillips@agri.idaho.gov" <Johanna.Phillips@agri.idaho.gov>; "spwalker@mosaorganic.org" <spwalker@mosaorganic.org>; "maury.wills@iowaagriculture.gov" <maury.wills@iowaagriculture.gov>; "soh@imo.ch" <soh@imo.ch>; "wippl001@umn.edu" <wippl001@umn.edu>; "nop@icea.info" <nop@icea.info>; "dawn@ics-intl.com" <dawn@ics-intl.com>; "knewkirk@mofga.org" <knewkirk@mofga.org>; "adam.watson@ky.gov" <adam.watson@ky.gov>; "maury.wills@iowaagriculture.gov" <maury.wills@iowaagriculture.gov>; "etyanich@mt.gov" <etyanich@mt.gov>; "info@bcs-oeko.de" <info@bcs-oeko.de>; "nop@icea.info" <nop@icea.info>; "CarltonN@co.monterey.ca.us" <CarltonN@co.monterey.ca.us>; "lacon@lacon-institut.org" <lacon@lacon-institut.org>; "adam.watson@ky.gov" <adam.watson@ky.gov>; "kirriley.becker@nasaa.com.au" <kirriley.becker@nasaa.com.au>; "letis@letis.org" <letis@letis.org>; "fischer@bcs-oeko.de" <fischer@bcs-oeko.de>; "cfanta@naturesinternational.com" <cfanta@naturesinternational.com>; "jstiles@marincounty.org" <jstiles@marincounty.org>; "j.kopp@lacon-institut.org" <j.kopp@lacon-institut.org>; "jabbott@agri.nv.gov" <jabbott@agri.nv.gov>; "FGIS OA, Maryland" <Deanna.Baldwin@maryland.gov>; "internacional@letis.org" <internacional@letis.org>; "Victoria.Smith@agr.nh.gov" <Victoria.Smith@agr.nh.gov>; "info@mayacert.com" <info@mayacert.com>; "jstiles@marincounty.org" <jstiles@marincounty.org>; "Daniel.wunderlich@ag.state.nj.us" <Daniel.wunderlich@ag.state.nj.us>; "mosa@mosaorganic.org" <mosa@mosaorganic.org>; "FGIS OA, Maryland" <Deanna.Baldwin@maryland.gov>; 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**Sent:** Tuesday, March 1, 2016 6:11 PM

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)

- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Robin Schrieber <robin@qcsinfo.org>  
**Sent:** Thursday, March 10, 2016 5:53 PM  
**To:** McElroy, Bridget - AMS  
**Cc:** Ryan  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Ms. McElroy,

QCS estimates that we currently certify roughly 4-5 operations that fall under the description provided below of "hydroponic, aquaponic, aeroponic and associated production systems." We do not track individual production systems of clients in our database, so the data is not very easy to pull.

We can try digging for more specific data as requested below (location of operation, type of product produced), if provided with some additional time, since it is not readily searchable in our current client database. Please let me know if this is acceptable, and needed, and by when we would need to respond.

Please be sure to cc our Crop Certification Manager, Ryan Brouillard (cc'd on this email), in your response. I am pregnant, and due this Sunday (March 13), so I may not be able to respond to email for a few weeks.

Kind Regards,

Robin Schrieber

Administrative Manager  
Quality Certification Services  
352.377.0133 | [www.qcsinfo.org](http://www.qcsinfo.org)

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**From:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **On Behalf Of** AMS - AIAinbox  
**Sent:** Tuesday, March 1, 2016 10:12 AM  
**To:** AMS - AIAinbox  
**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); Koble, Clinton - FSA, Reno, NV; [emel.erkar@bio-inspecta.com](mailto:emel.erkar@bio-inspecta.com); [central@biolatina.com](mailto:central@biolatina.com); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); [amalia.rueda@bioagricert.org](mailto:amalia.rueda@bioagricert.org); [admin@bio-inspecta.ch](mailto:admin@bio-inspecta.ch); [central@biolatina.com](mailto:central@biolatina.com); [Pat.Kennelly@cdph.ca.gov](mailto:Pat.Kennelly@cdph.ca.gov); [info@bioagricert.org](mailto:info@bioagricert.org); [julia.winter@bio-inspecta.ch](mailto:julia.winter@bio-inspecta.ch); [accreditation@ccof.org](mailto:accreditation@ccof.org); [Bolicert@megalink.com](mailto:Bolicert@megalink.com); [riccardo.cozzo@bioagricert.org](mailto:riccardo.cozzo@bioagricert.org); [calidad@certimexsc.com](mailto:calidad@certimexsc.com); [rporto@caae.es](mailto:rporto@caae.es); [Bolicert@bolicert.org](mailto:Bolicert@bolicert.org); [tom.nizet@certisys.eu](mailto:tom.nizet@certisys.eu); [ccof@ccof.org](mailto:ccof@ccof.org); [rporto@caae.es](mailto:rporto@caae.es); [saltmn@clemson.edu](mailto:saltmn@clemson.edu); [ccpb@ccpb.it](mailto:ccpb@ccpb.it); [Danny.Lee@cdfa.ca.gov](mailto:Danny.Lee@cdfa.ca.gov); [mitchell.yergert@state.co.us](mailto:mitchell.yergert@state.co.us); [certimex@certimexsc.com](mailto:certimex@certimexsc.com); Lewin Jake-FASConatct; [jvdschootbrugge@controlunion.com](mailto:jvdschootbrugge@controlunion.com); [ceres@ceres-cert.com](mailto:ceres@ceres-cert.com); [rsetti@ccpb.it](mailto:rsetti@ccpb.it); [vincent.morel@ecocert.com](mailto:vincent.morel@ecocert.com); [info@certisys.eu](mailto:info@certisys.eu); [direccionejecutiva@certimexsc.com](mailto:direccionejecutiva@certimexsc.com); [agroecologiauna@gmail.com](mailto:agroecologiauna@gmail.com); [organic@clemson.edu](mailto:organic@clemson.edu); [benzing@ceres-cert.com](mailto:benzing@ceres-cert.com); [mefraga@foodsafety.com.ar](mailto:mefraga@foodsafety.com.ar); [amy.stafford@state.co.us](mailto:amy.stafford@state.co.us); [Nathalie.Boes@certisys.eu](mailto:Nathalie.Boes@certisys.eu); [joy.mccracken@georgiacrop.com](mailto:joy.mccracken@georgiacrop.com); [organic@controlunion.com](mailto:organic@controlunion.com); [organic@clemson.edu](mailto:organic@clemson.edu); [cvanhook77@earthlink.net](mailto:cvanhook77@earthlink.net); [info.ecocertico@ecocert.com](mailto:info.ecocertico@ecocert.com); [amy.stafford@state.co.us](mailto:amy.stafford@state.co.us); [goabecky@centurylink.net](mailto:goabecky@centurylink.net); [aude.bonnet@ecocert.com](mailto:aude.bonnet@ecocert.com); [dszalai@controlunion.com](mailto:dszalai@controlunion.com); [camila@ibd.com.br](mailto:camila@ibd.com.br); [ep@ecoglobe.am](mailto:ep@ecoglobe.am); [Jeffry.EVARD@ecocert.com](mailto:Jeffry.EVARD@ecocert.com); [Jason.Laney@agri.idaho.gov](mailto:Jason.Laney@agri.idaho.gov); [pdescamps@eco-logica.com](mailto:pdescamps@eco-logica.com); [aude.bonnet@ecocert.com](mailto:aude.bonnet@ecocert.com); [Beatrice.Breuer@imo.ch](mailto:Beatrice.Breuer@imo.ch);

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[Organic@TexasAgriculture.gov](mailto:Organic@TexasAgriculture.gov); [robin@qcsinfo.org](mailto:robin@qcsinfo.org); [\(b\) \(6\) @gmail.com](mailto:(b) (6) @gmail.com); [matt.green@dem.ri.gov](mailto:matt.green@dem.ri.gov); [rlarsen@utah.gov](mailto:rlarsen@utah.gov); [bnauman@scsglobalservices.com](mailto:bnauman@scsglobalservices.com); [Info@nofavt.org](mailto:Info@nofavt.org); [Sally@Demeter-USA.org](mailto:Sally@Demeter-USA.org); [organic@agr.wa.gov](mailto:organic@agr.wa.gov); [Mary.Holliman@texasagriculture.gov](mailto:Mary.Holliman@texasagriculture.gov); [dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org); [\(b\) \(6\) @gmail.com](mailto:(b) (6) @gmail.com); [rlarsen@utah.gov](mailto:rlarsen@utah.gov); [Nicole@nofavt.org](mailto:Nicole@nofavt.org); [bbook@agr.wa.gov](mailto:bbook@agr.wa.gov); [dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets

- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Daniel Szalai <dszalai@controlunion.com>  
**Sent:** Tuesday, March 08, 2016 4:59 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**Attachments:** image001.png

Dear Ms McElroy,

Please find CUC's answers below.

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? yes  
If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? 1  
In what state or country (if international) are the certified operations located (list)? The Netherlands  
What crops do these certified operations produce (list)? Peppers/Paprika

Kind regards,  
Daniel Szalai

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Dániel Szalai

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Control Union Certifications

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**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox

**Sent:** Tuesday, March 01, 2016 4:12 PM

**To:** AMS - AIAinbox <AIAinbox@ams.usda.gov>

**Cc:** admin@abeeorganic.com; sarah@abeeorganic.com; ro@abeeorganic.com; info@ascorganic.com; Kat@ascorganic.com; mfigueiras@argencert.com.ar; americert@gmail.com; americert@gmail.com; organic@ausmeat.com.au; info@argencert.com.ar; lmontenegro@argencert.com.ar; jorge.larranaga@aco.net.au; organic@ausqual.com.au; elise@ausqual.com.au; dcox@baystateorganic.org; michael.baker@aco.net.au; michael.baker@aco.net.au; roxana.priego@biolatina.com.pe; baystateorganic@earthlink.net; Koble, Clinton - FSA, Reno, NV <clinton.koble@nv.usda.gov>; emel.erkar@bio-inspecta.com; central@biolatina.com; baystateorganic@earthlink.net; amalia.rueda@bioagricert.org; admin@bio-inspecta.ch; central@biolatina.com; Pat.Kennelly@cdph.ca.gov; info@bioagricert.org; julia.winter@bio-inspecta.ch; accreditation@ccof.org; Bolicert@megalink.com; riccardo.cozzo@bioagricert.org; calidad@certimexsc.com; rporto@caae.es; Bolicert@bolicert.org; tom.nizet@certisys.eu; ccof@ccof.org; rporto@caae.es; saltmn@clemson.edu; ccpb@ccpb.it; Danny.Lee@cdfa.ca.gov; mitchell.yergert@state.co.us; certimex@certimexsc.com; Lewin Jake-FASConatct <jake@ccof.org>; Johan van de Schootbrugge <jvdschootbrugge@controlunion.com>; ceres@ceres-cert.com; rsetti@ccpb.it; vincent.morel@ecocert.com; info@certisys.eu; direccionejecutiva@certimexsc.com;



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**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MCELROY, BRID2CEA01B0-F300-4D5B-A8C2-106C55F5CCE466C>  
**Sent:** Thursday, March 03, 2016 4:22 PM  
**To:** Roberto Setti  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Roberto.

---

**From:** Roberto Setti [mailto:rsetti@ccpb.it]  
**Sent:** Tuesday, March 01, 2016 11:17 AM  
**To:** McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
**Subject:** Re: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**Importance:** High

Dear Bridget,

### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **NO**

Kind regards

rs

Roberto Setti  
Techn. Dept. & Q.A. Manager  
CCPB SRL  
Viale Masini 36  
40126 Bologna (ITALY)  
tel: +39-051-6089811  
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---

**From:** [AMS - AIAinbox](#)  
**Sent:** Tuesday, March 01, 2016 4:11 PM



**To:** [AMS - AIAinbox](#)

**Cc:** [admin@abeeorganic.com](#) ; [sarah@abeeorganic.com](#) ; [ro@abeeorganic.com](#) ; [info@ascorganic.com](#) ; [Kat@ascorganic.com](#) ; [mfigueiras@argencert.com.ar](#) ; [americert@gmail.com](#) ; [americert@gmail.com](#) ; [organic@ausmeat.com.au](#) ; [info@argencert.com.ar](#) ; [lmontenegro@argencert.com.ar](#) ; [jorge.larranaga@aco.net.au](#) ; [organic@ausqual.com.au](#) ; [elise@ausqual.com.au](#) ; [dcox@baystateorganic.org](#) ; [michael.baker@aco.net.au](#) ; [michael.baker@aco.net.au](#) ; [roxana.priego@biolatina.com.pe](#) ; [baystateorganic@earthlink.net](#) ; [Koble, Clinton - FSA, Reno, NV](#) ; [emel.erkar@bio-inspecta.com](#) ; [central@biolatina.com](#) ; [baystateorganic@earthlink.net](#) ; [amalia.rueda@bioagricert.org](#) ; [admin@bio-inspecta.ch](#) ; [central@biolatina.com](#) ; [Pat.Kennelly@cdph.ca.gov](#) ; [info@bioagricert.org](#) ; [julia.winter@bio-inspecta.ch](#) ; [accreditation@ccof.org](#) ; [Bolicert@megalink.com](#) ; [riccardo.cozzo@bioagricert.org](#) ; [calidad@certimexsc.com](#) ; [rporto@caae.es](#) ; [Bolicert@bolicert.org](#) ; [tom.nizet@certisys.eu](#) ; [ccof@ccof.org](#) ; [rporto@caae.es](#) ; [saltmn@clemson.edu](#) ; [ccpb@ccpb.it](#) ; [Danny.Lee@cdfa.ca.gov](#) ; [mitchell.vergert@state.co.us](#) ; [certimex@certimexsc.com](#) ; [Lewin Jake-FASConatct](#) ; [jvdschootbrugge@controlunion.com](#) ; [ceres@ceres-cert.com](#) ; [rsetti@ccpb.it](#) ; [vincent.morel@ecocert.com](#) ; [info@certisys.eu](#) ; [direccionejecutiva@certimexsc.com](#) ; [agroecologiauna@gmail.com](#) ; [organic@clemson.edu](#) ; [benzing@ceres-cert.com](#) ; [mefraga@foodsafety.com.ar](#) ; [amy.stafford@state.co.us](#) ; [Nathalie.Boes@certisys.eu](#) ; [joy.mccracken@georgiacrop.com](#) ; [organic@controlunion.com](#) ; [organic@clemson.edu](#) ; [cvanhook77@earthlink.net](#) ; [info.ecocertico@ecocert.com](#) ; [amy.stafford@state.co.us](#) ; [goabecky@centurylink.net](#) ; [aude.bonnet@ecocert.com](#) ; [dszalai@controlunion.com](#) ; [camila@ibd.com.br](#) ; [ep@ecoglobe.am](#) ; [Jeffry.EVARD@ecocert.com](#) ; [Jason.Laney@agri.idaho.gov](#) ; [pdscamps@ecologica.com](#) ; [aude.bonnet@ecocert.com](#) ; [Beatrice.Breuer@imo.ch](#) ; [info@etko.org](#) ; [nd@ecoglobe.am](#) ; [Mary.nieland@iowaagriculture.gov](#) ; [foodsafety@foodsafety.com.ar](#) ; [pdscamps@ecologica.com](#) ; [p.perrone@icea.info](#) ; [terry.hollifield@georgiacrop.com](#) ; [ma@etko.org](#) ; [Kristen.Branscum@ky.gov](#) ; [info@globalculture.us](#) ; [calidad@foodsafety.com.ar](#) ; [herr@bcs-oeko.de](#) ; [goaorg@centurylink.net](#) ; [terry.hollifield@georgiacrop.com](#) ; [a.moutapam@lacon-institut.org](#) ; [Ibd@Ibd.com.br](#) ; [globalculture@earthlink.net](#) ; [monica@letis.org](#) ; [Johanna.Phillips@agri.idaho.gov](#) ; [goaorg@centurylink.net](#) ; [scarlsen@co.marlin.ca.us](#) ; [imo@imo.ch](#) ; [gwendal@ibd.com.br](#) ; [juanantonio.mendoza@mayacert.com](#) ; [info@ics-intl.com](#) ; [Johanna.Phillips@agri.idaho.gov](#) ; [spwalker@mosaorganic.org](#) ; 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[Bryan.Buchwald@aq.ok.gov](#) ; [agrorganic@mt.gov](#) ; [michelle.menken@mncia.org](#) ; [leng@oda.state.or.us](#) ; [agcomm@co.monterey.ca.us](#) ; [yurlina@mofqa.org](#) ; [abrewster@ocia.org](#) ; [sachin.ayachit@nasaa.com.au](#) ; [gwebster@mt.gov](#) ; [gestiondecalidad@oia.com.ar](#) ; [nfc certification@gmail.com](#) ; [Huntinggb@co.monterey.ca.us](#) ; [hi.yoshida@omicnet.com](#) ; [nics@naturesinternational.com](#) ; [sachin.ayachit@nasaa.com.au](#) ; [kyla@paorganic.org](#) ; [Jennifer.Gornert@agr.nh.gov](#) ; [nfc certification@gmail.com](#) ; [brian.mansfield@primuslabs.com](#) ; [erich.bremer@aq.state.nj.us](#) ; [dave@naturesinternational.com](#) ; [byron.hamm@pro-cert.org](#) ; [organic@nmda.nmsu.edu](#) ; [ajeppson@agri.nv.gov](#) ; [thughes@nsf.org](#) ; [certifiedorganic@nofany.org](#) ; [Jennifer.Gornert@agr.nh.gov](#) ; [ram@qcsinfo.org](#) ; [organic@oeffa.org](#) ; [erich.bremer@aq.state.nj.us](#) ; [dkirsanovaphillips@scscertified.com](#) ; [jeff.stearns@aq.ok.gov](#) ; 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[\(b\) \(6\)](#) @gmail.com ; [matt.green@dem.ri.gov](#) ; [rlarsen@utah.gov](#) ; [bnauman@scsglobalservices.com](#) ; [Info@nofavt.org](#) ; [Sally@Demeter-USA.org](#) ; [organic@agr.wa.gov](#) ; [Mary.Holliman@texasagriculture.gov](#) ; [dennis.chambers@yolocounty.org](#) ; [\(b\) \(6\)](#) @gmail.com ; [rlarsen@utah.gov](#) ; [Nicole@nofavt.org](#) ; [bbook@agr.wa.gov](#) ; [dennis.chambers@yolocounty.org](#)

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:



The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MCELROY, BRID2CEA01B0-F300-4D5B-A8C2-106C55F5CCE466C>  
**Sent:** Thursday, March 17, 2016 3:47 PM  
**To:** Daniel Szalai  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**Attachments:** image001.png

Thank you, Daniel!

---

**From:** Daniel Szalai [mailto:dszalai@controlunion.com]  
**Sent:** Tuesday, March 08, 2016 4:59 AM  
**To:** McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Ms McElroy,

Please find CUC's answers below.

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? yes  
If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? 1  
In what state or country (if international) are the certified operations located (list)? The Netherlands  
What crops do these certified operations produce (list)? Peppers/Paprika

Kind regards,  
Daniel Szalai

---

**Dániel Szalai**

T +31-38-426 0100 • F : +31-38-423 7040



Control Union Certifications

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<http://certification.controlunion.com/>

---

**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox  
**Sent:** Tuesday, March 01, 2016 4:12 PM  
**To:** AMS - AIAinbox <AIAinbox@ams.usda.gov>  
**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au);

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[agroecologiauna@gmail.com](mailto:agroecologiauna@gmail.com); [organic@clemsun.edu](mailto:organic@clemsun.edu); [benzing@ceres-cert.com](mailto:benzing@ceres-cert.com); [mefraga@foodsafety.com.ar](mailto:mefraga@foodsafety.com.ar); [amy.stafford@state.co.us](mailto:amy.stafford@state.co.us); [Nathalie.Boes@certisys.eu](mailto:Nathalie.Boes@certisys.eu); [joy.mccracken@georgiacrop.com](mailto:joy.mccracken@georgiacrop.com); Organic <[Organic@controlunion.com](mailto:Organic@controlunion.com)>; [organic@clemsun.edu](mailto:organic@clemsun.edu); [cvanhook77@earthlink.net](mailto:cvanhook77@earthlink.net); [info.ecocertico@ecocert.com](mailto:info.ecocertico@ecocert.com); [amy.stafford@state.co.us](mailto:amy.stafford@state.co.us); [goabecky@centurylink.net](mailto:goabecky@centurylink.net); [aude.bonnet@ecocert.com](mailto:aude.bonnet@ecocert.com); Daniel Szalai <[dszalai@controlunion.com](mailto:dszalai@controlunion.com)>; [camila@ibd.com.br](mailto:camila@ibd.com.br); [ep@ecoglobe.am](mailto:ep@ecoglobe.am); [Jeffry.EVARD@ecocert.com](mailto:Jeffry.EVARD@ecocert.com); [Jason.Laney@agri.idaho.gov](mailto:Jason.Laney@agri.idaho.gov); [pdescamps@eco-logica.com](mailto:pdescamps@eco-logica.com); [aude.bonnet@ecocert.com](mailto:aude.bonnet@ecocert.com); [Beatrice.Breuer@imo.ch](mailto:Beatrice.Breuer@imo.ch); [info@etko.org](mailto:info@etko.org); [nd@ecoglobe.am](mailto:nd@ecoglobe.am); [Mary.nieland@iowaagriculture.gov](mailto:Mary.nieland@iowaagriculture.gov); [foodsafety@foodsafety.com.ar](mailto:foodsafety@foodsafety.com.ar); [pdescamps@eco-logica.com](mailto:pdescamps@eco-logica.com); [p.perrone@icea.info](mailto:p.perrone@icea.info); [terry.hollifield@georgiacrop.com](mailto:terry.hollifield@georgiacrop.com); [ma@etko.org](mailto:ma@etko.org); [Kristen.Branscum@ky.gov](mailto:Kristen.Branscum@ky.gov); [info@globalculture.us](mailto:info@globalculture.us); [calidad@foodsafety.com.ar](mailto:calidad@foodsafety.com.ar); [herr@bcs-oeko.de](mailto:herr@bcs-oeko.de); [goaorg@centurylink.net](mailto:goaorg@centurylink.net); 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[Nicole@nofavt.org](mailto:Nicole@nofavt.org); [bbook@agr.wa.gov](mailto:bbook@agr.wa.gov); [dennis.chambers@yolocounty.org](mailto:dennis.chambers@yolocounty.org)

**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply.

Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** Nathalie Boes <nathalie.boes@certisys.eu>  
**Sent:** Tuesday, March 01, 2016 10:30 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** Re: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**Attachments:** logo\_02.jpg; logo\_03.jpg; logo\_04.jpg; logo\_06.jpg

Dear,

Certisys does not certify hydroponic or aeroponic operations.

Best regards,

**Nathalie BOES**  
QUALITY DEPARTMENT



TEL +32(0)81 600 377 | FAX +32(0)81 600 313  
nathalie.boes@certisys.eu | [www.certisys.eu](http://www.certisys.eu)

I am out of office on Monday afternoon, Wednesday and Friday for urgent matters please contact [quality@certisys.eu](mailto:quality@certisys.eu)  
Le 1/03/2016 16:11, AMS - AIAinbox a écrit :

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division  
Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

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What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MCELROY, BRID2CEA01B0-F300-4D5B-A8C2-106C55F5CCE466C>  
**Sent:** Thursday, March 03, 2016 4:26 PM  
**To:** Ricardo Porto  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**Attachments:** image001.jpg

Thank you, Ricardo.

### Bridget McElroy

Policy Analyst  
USDA National Organic Program  
1400 Independence Ave. SW  
Room 2646-S. (Stop 0268)  
Washington, D.C. 20205

(202) 260-9288

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**From:** Ricardo Porto [mailto:rporto@caae.es]  
**Sent:** Wednesday, March 02, 2016 7:51 AM  
**To:** McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
**Subject:** RV: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget

Our answer below in the text.

Best regards




### Ricardo J. Porto Martín

*Quality Manager*

[rporto@caae.es](mailto:rporto@caae.es) - caae.es

Avd. Emilio Lemos nº 2 Edificio Torre Este. Modulo 603. 41020. Sevilla.

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**Enviado el:** martes, 1 de marzo de 2016 16:12

**Para:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>

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[robin@qcsinfo.org](mailto:robin@qcsinfo.org); (b) (6) @gmail.com; [matt.green@dem.ri.gov](mailto:matt.green@dem.ri.gov); [rlarsen@utah.gov](mailto:rlarsen@utah.gov); [bnauman@scsglobalservices.com](mailto:bnauman@scsglobalservices.com);  
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**Asunto:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **NO**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **NA**

In what state or country (if international) are the certified operations located (list)? **NA**

What crops do these certified operations produce (list)? **NO**

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney

Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MCELROY, BRID2CEA01B0-F300-4D5B-A8C2-106C55F5CCE466C>  
**Sent:** Thursday, March 17, 2016 4:06 PM  
**To:** Dave Lockman  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**Attachments:** image001.jpg

Thank you, Dave!

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**From:** Dave Lockman [mailto:dave.lockman@pro-cert.org]  
**Sent:** Wednesday, March 09, 2016 1:16 PM  
**To:** McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget,

We do not currently certify hydroponic, aeroponic or aquaponics operations.

If you have any questions please do not hesitate to contact me.

Sincerely,

**Pro-Cert Organic Systems Ltd.**

Dave Lockman, MBA, P.Ag.

Certification Manager, Eastern Region

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E: [dave.lockman@pro-cert.org](mailto:dave.lockman@pro-cert.org)  
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**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox  
**Sent:** March-01-16 10:12 AM  
**To:** AMS - AIAinbox <AIAinbox@ams.usda.gov>  
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**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.



Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply.

Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MCELROY, BRID2CEA01B0-F300-4D5B-A8C2-106C55F5CCE466C>  
**Sent:** Thursday, March 03, 2016 4:25 PM  
**To:** Sachin Ayachit  
**Cc:** Kirrilley Becker  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Sachin.

### Bridget McElroy

Policy Analyst  
USDA National Organic Program  
1400 Independence Ave. SW  
Room 2646-S. (Stop 0268)  
Washington, D.C. 20205

(202) 260-9288

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**From:** Sachin Ayachit [mailto:Sachin.Ayachit@nasaa.com.au]  
**Sent:** Tuesday, March 01, 2016 5:45 PM  
**To:** McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
**Cc:** Kirrilley Becker <Kirrilley.Becker@nasaa.com.au>  
**Subject:** FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hi Bridget,  
At NASAA Certified Organic (NCO) Australia, we do not certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards.  
Please let me know if you have any further questions.  
Thanks  
Sachin Ayachit

**Sachin Ayachit**  
Certification Manager



**NASAA Certified Organic**  
**Address:** Unit 7, 3 Mount Barker Road, Stirling SA 5152  
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**Website:** [www.nasaa.com.au](http://www.nasaa.com.au)



**Thinking Sustainability? Think NASAA, Australia's First Organic Certification Organisation**

**From:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **On Behalf Of** AMS - AIAinbox

**Sent:** Wednesday, 2 March 2016 1:42 AM

**To:** AMS - AIAinbox <[AIAinbox@ams.usda.gov](mailto:AIAinbox@ams.usda.gov)>

**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); 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[Bolicert@bolicert.org](mailto:Bolicert@bolicert.org); [tom.nizet@certisys.eu](mailto:tom.nizet@certisys.eu); [ccof@ccof.org](mailto:ccof@ccof.org); [rporto@caae.es](mailto:rporto@caae.es); [saltmn@clemsun.edu](mailto:saltmn@clemsun.edu); [ccpb@ccpb.it](mailto:ccpb@ccpb.it); [Danny.Lee@cdfa.ca.gov](mailto:Danny.Lee@cdfa.ca.gov); [mitchell.yergert@state.co.us](mailto:mitchell.yergert@state.co.us); [certimex@certimexsc.com](mailto:certimex@certimexsc.com); Lewin Jake-FASConatct <[jake@ccof.org](mailto:jake@ccof.org)>; [jvdschootbrugge@controlunion.com](mailto:jvdschootbrugge@controlunion.com); [ceres@ceres-cert.com](mailto:ceres@ceres-cert.com); [rsetti@ccpb.it](mailto:rsetti@ccpb.it); [vincent.morel@ecocert.com](mailto:vincent.morel@ecocert.com); [info@certisys.eu](mailto:info@certisys.eu); [direccionejecutiva@certimexsc.com](mailto:direccionejecutiva@certimexsc.com); [agroecologiauna@gmail.com](mailto:agroecologiauna@gmail.com); [organic@clemsun.edu](mailto:organic@clemsun.edu); [benzing@ceres-cert.com](mailto:benzing@ceres-cert.com); 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**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

#### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

#### Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MCELROY, BRID2CEA01B0-F300-4D5B-A8C2-106C55F5CCE466C>  
**Sent:** Thursday, March 03, 2016 4:23 PM  
**To:** Eugenia Fraga  
**Subject:** RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**Attachments:** image001.jpg

Thank you, Eugenia.

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**From:** Eugenia Fraga [mailto:mefraga@foodsafety.com.ar]  
**Sent:** Tuesday, March 01, 2016 11:19 AM  
**To:** McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
**Subject:** RV: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget,  
In Food Safety we do not certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards.

Please let me know if you need something else.

Regards,



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**De:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **En nombre de** AMS - AIAinbox  
**Enviado el:** martes, 01 de marzo de 2016 12:12 p.m.  
**Para:** AMS - AIAinbox  
**CC:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [lmontenegro@argencert.com.ar](mailto:lmontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au); [organic@ausqual.com.au](mailto:organic@ausqual.com.au); [elise@ausqual.com.au](mailto:elise@ausqual.com.au); [dcox@baystateorganic.org](mailto:dcox@baystateorganic.org); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [michael.baker@aco.net.au](mailto:michael.baker@aco.net.au); [roxana.priego@biolatina.com.pe](mailto:roxana.priego@biolatina.com.pe); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); Koble, Clinton - FSA, Reno, NV; [emel.erkhan@bio-inspecta.com](mailto:emel.erkhan@bio-inspecta.com); [central@biolatina.com](mailto:central@biolatina.com); [baystateorganic@earthlink.net](mailto:baystateorganic@earthlink.net); [amalia.rueda@bioagricert.org](mailto:amalia.rueda@bioagricert.org); [admin@bio-inspecta.ch](mailto:admin@bio-inspecta.ch); [central@biolatina.com](mailto:central@biolatina.com); [Pat.Kennelly@cdph.ca.gov](mailto:Pat.Kennelly@cdph.ca.gov); [info@bioagricert.org](mailto:info@bioagricert.org); [julia.winter@bio-inspecta.ch](mailto:julia.winter@bio-inspecta.ch); [accreditation@ccof.org](mailto:accreditation@ccof.org); [Bolicert@megalink.com](mailto:Bolicert@megalink.com); [riccardo.cozzo@bioagricert.org](mailto:riccardo.cozzo@bioagricert.org); [calidad@certimexsc.com](mailto:calidad@certimexsc.com); [rporto@caae.es](mailto:rporto@caae.es); [Bolicert@bolicert.org](mailto:Bolicert@bolicert.org); [tom.nizet@certisys.eu](mailto:tom.nizet@certisys.eu); [ccof@ccof.org](mailto:ccof@ccof.org); [rporto@caae.es](mailto:rporto@caae.es); [saltmn@clermson.edu](mailto:saltmn@clermson.edu); [ccpb@ccpb.it](mailto:ccpb@ccpb.it); [Danny.Lee@cdfa.ca.gov](mailto:Danny.Lee@cdfa.ca.gov); [mitchell.yergert@state.co.us](mailto:mitchell.yergert@state.co.us); [certimex@certimexsc.com](mailto:certimex@certimexsc.com); Lewin Jake-FASConatct; [jvdschootbrugge@controlunion.com](mailto:jvdschootbrugge@controlunion.com); [ceres@ceres-cert.com](mailto:ceres@ceres-cert.com); [rsetti@ccpb.it](mailto:rsetti@ccpb.it); [vincent.morel@ecocert.com](mailto:vincent.morel@ecocert.com); [info@certisys.eu](mailto:info@certisys.eu); [direccionejecutiva@certimexsc.com](mailto:direccionejecutiva@certimexsc.com); [agroecologiauna@gmail.com](mailto:agroecologiauna@gmail.com); [organic@clermson.edu](mailto:organic@clermson.edu); [benzing@ceres-cert.com](mailto:benzing@ceres-cert.com); [mefraga@foodsafety.com.ar](mailto:mefraga@foodsafety.com.ar); [amy.stafford@state.co.us](mailto:amy.stafford@state.co.us); [Nathalie.Boes@certisys.eu](mailto:Nathalie.Boes@certisys.eu);

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**Asunto:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)

- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MCELROY, BRID2CEA01B0-F300-4D5B-A8C2-106C55F5CCE466C>  
**Sent:** Thursday, March 03, 2016 4:23 PM  
**To:** Cindy Elder  
**Subject:** RE: OCIA Intl FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you, Cindy.

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**From:** Cindy Elder [mailto:CElder@ocia.org]  
**Sent:** Tuesday, March 01, 2016 11:18 AM  
**To:** McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
**Cc:** Cindy Elder <CElder@ocia.org>  
**Subject:** OCIA Intl FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget,

OCIA International does not certify any hydroponic, aeroponic, or aquaponic operations.

Thank you,  
Cindy

### Cindy Elder

Director of Accreditation and Inspector Services/Board Liaison  
OCIA International, Inc.  
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OCIA is committed to providing environmentally sound stewardship through research, education, professional development and organic certification for organic farmers and processors.

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**From:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox  
**Sent:** Tuesday, March 01, 2016 9:12 AM  
**To:** AMS - AIAinbox  
**Cc:** [admin@abeeorganic.com](mailto:admin@abeeorganic.com); [sarah@abeeorganic.com](mailto:sarah@abeeorganic.com); [ro@abeeorganic.com](mailto:ro@abeeorganic.com); [info@ascorganic.com](mailto:info@ascorganic.com); [Kat@ascorganic.com](mailto:Kat@ascorganic.com); [mfigueiras@argencert.com.ar](mailto:mfigueiras@argencert.com.ar); [americert@gmail.com](mailto:americert@gmail.com); [americert@gmail.com](mailto:americert@gmail.com); [organic@ausmeat.com.au](mailto:organic@ausmeat.com.au); [info@argencert.com.ar](mailto:info@argencert.com.ar); [Imontenegro@argencert.com.ar](mailto:Imontenegro@argencert.com.ar); [jorge.larranaga@aco.net.au](mailto:jorge.larranaga@aco.net.au);

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[nop@icea.info](mailto:nop@icea.info); [dawn@ics-intl.com](mailto:dawn@ics-intl.com); [knewkirk@mofga.org](mailto:knewkirk@mofga.org); [adam.watson@ky.gov](mailto:adam.watson@ky.gov); [maury.wills@iowaagriculture.gov](mailto:maury.wills@iowaagriculture.gov); [etyanich@mt.gov](mailto:etyanich@mt.gov); [info@bcs-oeko.de](mailto:info@bcs-oeko.de); [nop@icea.info](mailto:nop@icea.info); [CarltonN@co.monterey.ca.us](mailto:CarltonN@co.monterey.ca.us); [lacon@lacon-institut.org](mailto:lacon@lacon-institut.org); [adam.watson@ky.gov](mailto:adam.watson@ky.gov); [kirrilley.becker@nasaa.com.au](mailto:kirrilley.becker@nasaa.com.au); [letis@letis.org](mailto:letis@letis.org); [fischer@bcs-oeko.de](mailto:fischer@bcs-oeko.de); [cfanta@naturesinternational.com](mailto:cfanta@naturesinternational.com); [jstiles@marincounty.org](mailto:jstiles@marincounty.org); [j.kopp@lacon-institut.org](mailto:j.kopp@lacon-institut.org); [jabbott@agri.nv.gov](mailto:jabbott@agri.nv.gov); FGIS OA, Maryland; [internacional@letis.org](mailto:internacional@letis.org); [Victoria.Smith@agr.nh.gov](mailto:Victoria.Smith@agr.nh.gov); [info@mayacert.com](mailto:info@mayacert.com); [jstiles@marincounty.org](mailto:jstiles@marincounty.org); [Daniel.wunderlich@ag.state.nj.us](mailto:Daniel.wunderlich@ag.state.nj.us); [mosa@mosaorganic.org](mailto:mosa@mosaorganic.org); FGIS OA, Maryland; [SGerk@nmda.nmsu.edu](mailto:SGerk@nmda.nmsu.edu); [mncia@mncia.org](mailto:mncia@mncia.org); [noe.rivera@mayacert.com](mailto:noe.rivera@mayacert.com); [lisaengelbert@nofany.org](mailto:lisaengelbert@nofany.org); [certification@mofga.org](mailto:certification@mofga.org); [cskolaski@mosaorganic.org](mailto:cskolaski@mosaorganic.org); [Bryan.Buchwald@ag.ok.gov](mailto:Bryan.Buchwald@ag.ok.gov); [agrorganic@mt.gov](mailto:agrorganic@mt.gov); [michelle.menken@mncia.org](mailto:michelle.menken@mncia.org); [leng@oda.state.or.us](mailto:leng@oda.state.or.us); [agcomm@co.monterey.ca.us](mailto:agcomm@co.monterey.ca.us); [yurlina@mofga.org](mailto:yurlina@mofga.org); Amanda Brewster; [sachin.ayachit@nasaa.com.au](mailto:sachin.ayachit@nasaa.com.au); [gwebster@mt.gov](mailto:gwebster@mt.gov); [gestiondecalidad@oia.com.ar](mailto:gestiondecalidad@oia.com.ar); [nfccertification@gmail.com](mailto:nfccertification@gmail.com); [Huntinggb@co.monterey.ca.us](mailto:Huntinggb@co.monterey.ca.us); [hi.yoshida@omicnet.com](mailto:hi.yoshida@omicnet.com); [nics@naturesinternational.com](mailto:nics@naturesinternational.com); [sachin.ayachit@nasaa.com.au](mailto:sachin.ayachit@nasaa.com.au); [kyla@paorganic.org](mailto:kyla@paorganic.org); [Jennifer.Gornert@agr.nh.gov](mailto:Jennifer.Gornert@agr.nh.gov); [nfccertification@gmail.com](mailto:nfccertification@gmail.com); [brian.mansfield@primuslabs.com](mailto:brian.mansfield@primuslabs.com); [erich.bremer@ag.state.nj.us](mailto:erich.bremer@ag.state.nj.us); [dave@naturesinternational.com](mailto:dave@naturesinternational.com); [byron.hamm@pro-cert.org](mailto:byron.hamm@pro-cert.org); [organic@nmda.nmsu.edu](mailto:organic@nmda.nmsu.edu); 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**Subject:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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## Schurkamp, Lynnea - AMS

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**From:** McElroy, Bridget - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MCELROY, BRID2CEA01B0-F300-4D5B-A8C2-106C55F5CCE466C>  
**Sent:** Monday, March 21, 2016 5:50 PM  
**To:** Maria Susana Gerlero  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**Attachments:** image001.png

Thank you, Maria Susana!

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**From:** Maria Susana Gerlero [mailto:calidad@foodsafety.com.ar]  
**Sent:** Monday, March 21, 2016 7:30 AM  
**To:** McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Ms Bridget

According your request (received trough Ms. Anne Baron)we do not certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards

Best regards



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**De:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **En nombre de** AMS - AIAinbox  
**Enviado el:** miércoles, 16 de marzo de 2016 04:30 p.m.  
**Para:** AMS - AIAinbox  
**Asunto:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

\*\*\*Original Message\*\*\*

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

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- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

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**From:** Book, Brenda (AGR) <BBook@agr.wa.gov>  
**Sent:** Friday, March 18, 2016 11:52 AM  
**To:** McElroy, Bridget - AMS  
**Cc:** O'Brien, Colleen (AGR)  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget,

Yes, only the one operation would fit the definition after this clarification.

Brenda Book  
WSDA Organic Program Manager

Direct: 360-902-2090 / [bbook@agr.wa.gov](mailto:bbook@agr.wa.gov)  
Main: 360-902-1805 / [organic@agr.wa.gov](mailto:organic@agr.wa.gov)  
Web: <http://agr.wa.gov/FoodAnimal/Organic>

Interested in organic certification? Learn more: <http://agr.wa.gov/FoodAnimal/Organic/NewOrg.aspx>

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**From:** McElroy, Bridget - AMS [<mailto:Bridget.McElroy@ams.usda.gov>]  
**Sent:** Thursday, March 17, 2016 1:43 PM  
**To:** Book, Brenda (AGR)  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hi Brenda,

Thank you very much for this information. From this and a couple of other responses, I'm realizing that one clarification should have been included in the message to certifiers. We aren't currently considering transplant/start production in the hydroponic/aquaponics count because ultimately these crops end up in the ground.

We are looking to include operations that use small amounts of growing media in hydroponic-based systems. For example, lettuce grown in a small plug of compost mix in an NFT system from seed to harvest.

From what I can gather, WSDA only certifies one operation that would really count (the ebb and flow for the full life cycle) and the rest are transplants. Does that sound right?

Best,

Bridget

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**From:** Book, Brenda (AGR) [<mailto:BBook@agr.wa.gov>]  
**Sent:** Wednesday, March 16, 2016 7:55 PM  
**To:** McElroy, Bridget - AMS <[Bridget.McElroy@ams.usda.gov](mailto:Bridget.McElroy@ams.usda.gov)>

**Cc:** Rice, Scott (AGR) <[SRice@agr.wa.gov](mailto:SRice@agr.wa.gov)>

**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget –

Thanks for the reminder. Our responses are below:

*Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?*

WSDA currently defines a hydroponic system as a system that is grown without media. We do not certify any operations that are grown without media.

However, if we apply the definition provided in the below email it would require that we include all of our operations that produce plant starts in greenhouses as a hydroponic operation. These growers start seeds in containers with small amounts of growing media and provide additional nutrients in the water provided to the plants. The majority of these growers will then sell these organic transplants to be planted outside in the ground. In very few instances, the grower continues to grow the plants until harvest in these containers, inside greenhouses or other facilities with artificial lighting. All of these growers could qualify as hydroponic systems based on the provided definition; none would be aeroponic or aquaponics systems.

*If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?*

We certify 80 operations that produce plant starts in a container production system. One of these maintains the plants in the container for its full life cycle and they are not considered plant starts; this operation uses an ebb and flow system.

*In what state or country (if international) are the certified operations located (list)?*

All are in Washington except the one that does not sell transplants, which is located in Georgia.

*What crops do these certified operations produce (list)?*

The plant starts are mixed vegetables and herbs. The crops of the operation in Georgia are listed as potted herbs and living herbs.

Brenda Book  
WSDA Organic Program Manager

Direct: 360-902-2090 / [bbook@agr.wa.gov](mailto:bbook@agr.wa.gov)

Main: 360-902-1805 / [organic@agr.wa.gov](mailto:organic@agr.wa.gov)

Web: <http://agr.wa.gov/FoodAnimal/Organic>

Interested in organic certification? Learn more: <http://agr.wa.gov/FoodAnimal/Organic/NewOrg.aspx>

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**From:** Baron , Anne - AMS [<mailto:AnneP.Baron@ams.usda.gov>] **On Behalf Of** AMS - AIAinbox

**Sent:** Wednesday, March 16, 2016 12:30 PM

**To:** AMS - AIAinbox

**Subject:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov) as soon as possible. The original message with instructions is below.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

\*\*\*Original Message\*\*\*

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

#### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

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Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

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**From:** Maria Susana Gerlero <calidad@foodsafety.com.ar>  
**Sent:** Monday, March 21, 2016 7:30 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**Attachments:** image003.png

Dear Ms Bridget

According your request (received trough Ms. Anne Baron)we do not certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards

Best regards



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**De:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **En nombre de** AMS - AIAinbox  
**Enviado el:** miércoles, 16 de marzo de 2016 04:30 p.m.  
**Para:** AMS - AIAinbox  
**Asunto:** Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

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What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

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## Schurkamp, Lynnea - AMS

---

**From:** DE COU Dave <dave.decou@ecocert.com>  
**Sent:** Monday, July 14, 2014 7:25 PM  
**To:** Mann, Renee - AMS  
**Cc:** Brines, Lisa - AMS; Melvin, Jonathan - AMS  
**Subject:** RE: Rockwool  
**Attachments:** image001.png

Renee Mann and all,

Ecocert ICO has not to date approved the use of Rockwool in any operation. We have not allowed the use of rockwool containing products but on the basis of other materials in the product. The question of rockwool appears to be forthcoming because of communication with a previous client of ours who was unable to meet the requirements to be an organic aquaponics client and chose to go to a different certifier and then has apparently chosen to return and to attempt to become certified by Ecocert ICO again after working with a consultant. Whether they can be fully certified or not is in process. Not to our knowledge have we informed them that they can use rockwool. In fact with this discussion we have stated to them that they should not use rockwool because it is in question.

The question of the allowance of rockwool as an input to an agricultural system depends upon a certain degree of interpretation of both the regulations and common practice. Rockwool is made by the melting of rock at high temperatures and creating strands by blowing air or steam through the liquid. Is the heating to 1600 degrees C of rock necessarily the creation of a synthetic? If there are additives to the process, the question becomes clearer, particularly if the additives are synthetic. Vermiculite is a particular rock which expands when heated, also commonly considered non-synthetic by all certifiers. Rockwool is considered to be environmentally good, with an ecolabel endorsement by the WHO. Clearly such a label does not determine the compliance of the material. But what about the use of other synthetic materials, not listed on 205.601, in organic production: Steel for the tools which work soil (hoes, plows, discs, etc. and rubber tires which wear out (slowly) on soil while being used on tractors and implements.

There is a progression of desired materials for organic aquaponic producers which is leading to a grey area:

- Plastic trays have been used in plug and plant production for organic producers for almost as long as plastic trays have been available to farmers. No certifier has denied the allowance of plastic trays in organic production to my knowledge and yet the various types of plastic are considered to be synthetic. If this use of plastic were eliminated for organic growers there would be a drastic reaction.
- Recently companies have blended similar types of plastic with peat moss to create a sponge like material for growing plugs or plants in. Most certifiers have indicated that this is not compliant under the regulations based on the use of a synthetic. It is not clear to me what is the difference between this use of plastic and that of plug trays which all allow and no other certifiers have given me an answer to that question. We do not allow this product because there is also a prohibited fungicide in the product, but both our clients and the manufacturer want us to allow it if the fungicide and any other prohibited substance were removed. The client considered the sponge like material to be a container much like a plastic tray. Insight on this issue would be helpful.
- Rockwool as a growing medium, blended with other allowed ingredients or just alone is also a desirable medium for growers. So is it a container, as the plastic trays above, or something else? And where do we as certifiers draw the line if you consider rockwool to be synthetic? This question will keep coming up for certifiers and their clients.

Regards,  
Dave



David DeCOU  
Certification Manager  
ECOCERT ICO LLC, 70 East Main Street, Ste. B  
Greenwood, Indiana 46143  
Toll Free: 888-337-8246 Office: 317-865-9700,  
Fax: 317-865-9707, Cell: (b) (6)  
<mailto:dave.decou@ecocert.com> / [www.ecocertico.com](http://www.ecocertico.com)

---

**From:** Mann, Renee - AMS [<mailto:Renee.Mann@ams.usda.gov>]  
**Sent:** Tuesday, June 24, 2014 8:35 PM  
**To:** DE COU Dave  
**Cc:** Brines, Lisa - AMS; Melvin, Jonathan - AMS  
**Subject:** Rockwool

Dear Dave,

This email is a request for additional information in accordance with [NOP Policy Memo 11-4](#), Evaluation of Materials Used in Organic Crop, Livestock, and Handling Operations.

NOP Policy Memo 11-4 provides a process for resolving conflicts in interpretation on the allowance of materials under the USDA organic regulations.

On June 17, 2014, a certifier contacted NOP regarding the use of Rockwool in organic hydroponic production. Specifically, the certifier requested NOP's interpretation on the allowance of Rockwool as an approved growing media in organic hydroponic operations. An operation that was denied the use of Rockwool in its hydroponic operation by its previous certifier was changing certifiers to Ecocert-ICO so that they could use this substance as a growing media for their organic hydroponic production.

In order to resolve this conflict in interpretation on the use of Rockwool in organic hydroponic production, **NOP requests that you provide a brief written summary of any current or previous decisions to approve or deny the use of Rockwool in organic hydroponic production.** The summary should include citations to relevant sections of the USDA organic regulations, as applicable, and indicate whether the Rockwool was previously approved or denied as a synthetic or nonsynthetic substance.

Following receipt, NOP will review the information provided from all parties and determine whether the regulations have been properly applied. NOP's determination will be limited to the application of the USDA organic regulations for generic materials; the NOP does not approve or endorse branded (formulated) input products.

A written response to this inquiry is requested no later than Tuesday, July 15th.

Sincerely,  
Renee

Ms. Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[NOP website](#)  
Sign up for our newsletter, the [USDA Organic Insider](#)

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## Schurkamp, Lynnea - AMS

---

**From:** Mann, Renee - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MANN, RENEE6BA41DDD-4FFB-41B9-9712-F7EF2E4B19ED>  
**Sent:** Wednesday, August 06, 2014 7:12 PM  
**To:** DE COU Dave  
**Cc:** Brines, Lisa - AMS; Melvin, Jonathan - AMS; Courtney, Cheri - AMS  
**Subject:** RE: Rockwool  
**Attachments:** image001.png

Hello Dave:

The NOP has completed a review of the rockwool issue to which you responded on July 14, 2014.

I would like to confirm that Rockwool is a synthetic material that is not allowed in organic hydroponic production per §205.100(a). Thank you for informing us that Ecocert ICO has not allowed the use of rockwool for any of its clients.

Please contact me if you have any questions or concerns.

Kind Regards,  
Renee

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

---

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David DeCOU  
Certification Manager  
ECOCERT ICO LLC, 70 East Main Street, Ste. B  
Greenwood, Indiana 46143  
Toll Free: 888-337-8246 Office: 317-865-9700,  
Fax: 317-865-9707, Cell: (b) (6)  
<mailto:dave.decou@ecocert.com> / [www.ecocertico.com](http://www.ecocertico.com)

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## Schurkamp, Lynnea - AMS

---

**From:** McElroy, Bridget - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MCELROY, BRID2CEA01B0-F300-4D5B-A8C2-106C55F5CCE466C>  
**Sent:** Friday, April 01, 2016 11:26 AM  
**To:** McEvoy, Miles - AMS  
**Subject:** RE: Survey

Hi Miles,

For the survey, the systems were defined this way:

### What do we mean by hydroponic, aquaponic, aeroponic?

We are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

Most certifiers who responded confirming that they do certify these systems were pretty specific about whether the systems are hydro, aqua, or container. However, there are a few (PCO, Primus, QCS) who didn't give specifics. It could be that some of what they are calling hydroponics are actually container systems. I think it would be helpful to follow up to verify what's what, particularly from Primus who reported 28 certified hydroponic operations. I can do that if necessary.

In the meantime, where are those who ARE certifying these types of operations:

Certifier	Hydroponic Operations	Aquaponic Operations	Other (Container)
A Bee Organic	7	4	
CCOF	4	3	39
Idaho State Department of Agriculture		1	
Control Union Certifications	1		
OTCO		12	
PCO	5		
MOFGA		1	

NSF	2		2
QCS	5		
Bay State Organic	4		
Primus	28		
ASCO	1		
Nature's International Certification Services	1		
International Certification Services			1
WSDA	1		
Americert	1		
Eco-LOGCA	2		
MCIA	1	1	

Bridget

---

**From:** McEvoy, Miles - AMS  
**Sent:** Friday, April 01, 2016 9:48 AM  
**To:** McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
**Subject:** RE: Survey

Please provide a list of certifiers that are certifying hydroponic or aquaponics operations. Also – how are container production systems defined?

---

**From:** McElroy, Bridget - AMS  
**Sent:** Monday, March 28, 2016 11:36 AM  
**To:** McEvoy, Miles - AMS <[Miles.McEvoy@ams.usda.gov](mailto:Miles.McEvoy@ams.usda.gov)>  
**Subject:** FW: Survey

Hi Miles,

Can I share the general results from the hydroponics survey with the task force? A few of them have asked about it. By general results, I'm thinking of the items below as we shared in last week's brown bag.

Status of Certification:

- Survey of 80 certifiers, 59 responded.
  - DO certify hydro/aquaponics: 18
  - DO NOT certify hydro/aquaponics: 41
  - Total hydroponic operations certified: 65
  - Total aquaponic operations certified: 22
  - Total container operations certified: 39
  - Types of crops: herbs, various greens, mixed vegetables (tomatoes, peppers, cucumbers, etc.), various berries, flowers, etc.
  - Geographic location of operations:
    - CA, Mexico, AZ, NM, TX, CO, MI, the Netherlands, OR, HI, WA, MO, LA, KS, ME, PA, GA, NY, NJ, OH, NC, FL, AK, VA

---

**From:** eric sideman [<mailto:esideman@mofga.org>]  
**Sent:** Monday, March 28, 2016 11:24 AM

**To:** McElroy, Bridget - AMS <[Bridget.McElroy@ams.usda.gov](mailto:Bridget.McElroy@ams.usda.gov)>

**Subject:** Survey

Good morning Bridget,

I was wondering how the response rate was to the survey done a few weeks ago of certifiers? And of course, are there results to share?

Eric

--

Eric Sideman

Crop Specialist

Maine Organic Farmers and Gardeners Association

Phone: 603 269 6201

[esideman@mofga.org](mailto:esideman@mofga.org)

## Schurkamp, Lynnea - AMS

---

**From:** David DeCou ICO <daved@indianacertifiedorganic.com>  
**Sent:** Thursday, September 27, 2012 7:56 PM  
**To:** Mann, Renee - AMS  
**Subject:** Re: Sweet Water Organics  
**Attachments:** ATT00001.jpg; ICO LogoNu.jpg

Renee-

You sent your email last week as I was in Indiana training a new certification officer. Sorry I did not look at this more carefully then. I have felt overwhelmed recently but with new help coming on line things are looking up.

I really do not know when or if they will be changing their name. They were clearly very concerned about not putting any version of the word "organic" on their proposed labels as they did not want to be found noncompliant again. I had to make it very clear that we needed their proposed labels to be able to review them assuming they would meet certification standards on the sprouts.

I have a call in to our inspector about the other issue. He is a good inspector and this could be a complaint from an (b) (6) We had one of those last spring from someone who was clearly (b) (6)

Dave

On 9/17/2012 8:20 AM, Mann, Renee - AMS wrote:

Hi Dave:

Thank you for the update. Do you know when SWO plans to change its name? They had originally told me they were already in the process of removing the word "organic." Now that it appears that part of their operation cannot be certified, it is important for them to change their company name. We will be following up with SWO, but I would like to know if you have any information on this topic.

Also, below is some additional information provided by an anonymous informant to the complainant after we closed our investigation. The NOP does not expect you to respond to us regarding an investigation of this information. ICO can determine whether it is appropriate to address this issue during the inspection of the facility or at another time, or not at all. Regarding the FDA concern noted below, the NOP will inform the FDA of the concern. I have included it below because the allegedly poor production methods described by the informant may be the result of violations of the NOP regulations in addition to FDA regulations.

Below is an excerpt of the information provided to the NOP:

"... the building materials used in both the [SWO's] older indoor aquaponic systems, and their new outdoor system, as well as the seeding plugs SWO uses to produce it's aquaponic vegetables *should* not permit them to meet organic certification criteria.

...you should look into the facts around sprout production requiring an FDA approved facility, whether organic or not. Sweet Water's current sprout production area is far from what the FDA would approve, and (as I understand it) is therefore illegal. Removing the word "Organics" from the label doesn't change that. Sweet Water's leaders have proved capable of many egregious shortcuts. At best, their sprouts are cut from trays with the bottom inch overtaken with mold before being rinsed and placed in clamshells for retail sale in local grocery stores. That said, many people have witnessed trays of sprouts from SW delivered to restaurants with the mold still encompassing the bottom parts of the stems. It would be unfortunate if anyone were to get sick from their negligence."

Kind Regards,  
Renee

Ms. Renee Mann

Compliance Specialist  
USDA National Organic Program  
+1 (202) 205-5213

---

**From:** David DeCou ICO [<mailto:daved@indianacertifiedorganic.com>]  
**Sent:** Friday, September 14, 2012 12:42 PM  
**To:** Mann, Renee - AMS  
**Subject:** Re: Sweet Water Organics

Renee-

Sweetwater has realized that part of their operation will not qualify for organic certification. The aquaponic portion has inputs which are not compliant. They will need to make significant changes for the aquaponics to be certifiable. But the portion of their operation which produces several types of sprouts appears to be certifiable. It is scheduled for inspection on the 23rd of September. The delay has been our scheduling issue.

Dave

On 9/13/2012 1:56 PM, Mann, Renee - AMS wrote:

Hi Dave:

Can you please provide me with an update on Sweet Water Organics? Have they achieved organic certification as a farmer and/or handler yet?

Thanks,  
Renee

Ms. Renee Mann  
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Sincerely,  
Dave



**David DeCOU**  
**Certification Manager**  
Indiana Certified Organic, LLC  
**NEW ADDRESS/PHONE:**

70 East Main Street, Suite B  
Greenwood, Indiana 46143  
(317) 865-9700 office (317) 865-9707 fax  
Cell: (b) (6)

EMAIL AND WEBSITE INFORMATION WILL REMAIN THE SAME

[www.indianacertifiedorganic.com](http://www.indianacertifiedorganic.com)

--

Sincerely,  
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## Schurkamp, Lynnea - AMS

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**Sent:** Monday, October 01, 2012 12:39 PM  
**To:** Mann, Renee - AMS  
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Renee

I spoke to the inspector soon after the inspection. He felt that the operation was well managed and had good quality control. He saw something that looked like mold on the base of some types of sprouts and asked the Quality manager there what it was. Apparently broccoli (I think) grows very fine root hairs out of the base of the sprout stem. The root hairs look like mold but are not. Mold would disintegrate if you touch it and the root hairs do not. I suspect that this is the problem that the complainant noticed and it is not actually a problem. Additionally, from what I can understand, sprout growers do not need to be licensed by FDA. FDA has provided sprout growers with guidance but it is only guidance not a licensing program.

Dave

On 10/1/2012 8:58 AM, Mann, Renee - AMS wrote:

Dear Dave:  
Thank you for the update.

Kind Regards,

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Dave



**David DeCOU**  
**Certification Manager**  
Indiana Certified Organic, LLC  
**NEW ADDRESS/PHONE:**  
70 East Main Street, Suite B  
Greenwood, Indiana 46143  
(317) 865-9700 office (317) 865-9707 fax  
Cell: (b) (6)

EMAIL AND WEBSITE INFORMATION WILL REMAIN THE SAME

[www.indianacertifiedorganic.com](http://www.indianacertifiedorganic.com)

--  
Sincerely,

Dave



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## Schurkamp, Lynnea - AMS

---

**From:** Lopez, JasonJ - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=LOPEZ, JASONJ5418CFE5-681F-4992-82F0-2EC48A970563417>  
**Sent:** Wednesday, September 09, 2015 7:44 AM  
**To:** certificacion@certimexsc.com  
**Cc:** Mann, Renee - AMS  
**Subject:** RE: Technical Consultation  
**Attachments:** image001.png

Mr. Garcia,

I have forwarded your consultation request to Renee Gebault-King, your accreditation manager, to provide you with a response.

Best regards,

### *Jason Lopez*

Accreditation Manager  
USDA National Organic Program  
1400 Independence Ave, SW  
Room 2649- South, Stop 0268  
Washington, DC 20250-0268  
Office: (202)260-9445  
[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

---

**From:** Certificaciones [mailto:certificacion@certimexsc.com]  
**Sent:** Tuesday, September 08, 2015 2:36 PM  
**To:** Lopez, JasonJ - AMS  
**Subject:** RV: Technical Consultation

Jason estimated , again sending a technical consultation .

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**De:** Certificaciones [mailto:certificacion@certimexsc.com]  
**Enviado el:** martes, 8 de septiembre de 2015 01:29 p. m.  
**Para:** 'Howley, JannaB - AMS' <[JannaB.Howley@ams.usda.gov](mailto:JannaB.Howley@ams.usda.gov)>  
**Asunto:** RE: Technical Consultation

Janna estimated , again sending a technical consultation .

1. What is “At Issue,” or your “Question”: Please state briefly, with no more than a few sentences, the issue or the question you wish answered. The producer of specialty produce (b) (4) small tomato / grape / round / red and yellow type , these tomatoes are produced in different parts of the republic ; San Isidro

Mazatepec , Zapotlán , Colima and Nayarit Tuxcacuesco , the total area of (b) ha The production system is now standard . ; greenhouses , drip irrigation and drip gray slab and pickaxe with coconut fiber substrate .

2. Relevant Standard(s): Please cite the relevant NOP standard(s), if applicable. Only it mentioned as well :

### Apéndice 1

1. Los productos agrícolas producidos mediante el uso de nitrato de sodio no se deben vender ni comercializar como orgánicos en Canadá.
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Our USA market is 95 % and 5 % between Canada and Mexico .

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Because to be produced under organic management in hydroponics .

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6. Urgency: If you are facing a deadline or under a time constraint, please indicate this to me. If I have this information, I will be better able to prioritize your question(s). 11.09. 2015

Best regards

Ing. Rocío Pacheco García

Area de Revisión

Usuario Skype: rocio.cmx.cmx

CERTIMEX, Certificadora Mexicana de Productos y Procesos Ecológicos, S. C.

Calle 16 de Septiembre No. 204, Ejido Guadalupe Victoria,

Oaxaca de Juárez, Oax., México. C. P. 68026

Tel. / Fax. ++ 951 5202687 / ++ 951 52 00617/ ++951 1336113

Email. Gral. [certimex@certimexsc.com](mailto:certimex@certimexsc.com)

Pag. Web: [www.certimexsc.com](http://www.certimexsc.com)

Horarios de Atención:

Lunes a Viernes

9: 00 a.m. a 14:00 p.m.

15:00 p.m. a 17:00 p.m.

Acreditada

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4. SAGARPA-SENASICA (Lineamientos para la Operación Orgánica de las Actividades Agropecuarias) para certificar productos orgánicos para el Mercado Nacional.
5. FUNDEPPO (SPP - Símbolo de Pequeños Productores) para el Mercado de Comercio Justo.

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**From:** Certificaciones [<mailto:certificacion@certimexsc.com>]

**Sent:** Tuesday, August 04, 2015 10:17 AM

**To:** Howley, JannaB - AMS

**Subject:** Consultar a NOP

## Schurkamp, Lynnea - AMS

---

**From:** Ramkrishnan P.B. <ram@qcsinfo.org>  
**Sent:** Tuesday, June 17, 2014 3:17 PM  
**To:** Mann, Renee - AMS  
**Cc:** denise aguero  
**Subject:** Rockwool Use n organic hyrdoponic production  
**Attachments:** Rockwool.docx

Renee,

QCS is seeking guidance of rockwool in hydroponics. QCS refused to allow rockwool to be a media for crop growth in hydroponic and come in contact with organic crop. Rockwool is a synthetic. The client switched to another certifier who allows rockwool for organic hydroponic production. We were advised by NOP that when certifiers disagree to bring it to NOP attention.

A guidance on whether rockwool is allowed or not will be helpful. Question attached.

Thanks,  
Ramkrishnan



## Quality Certification Services (QCS)

PO Box 12311 Gainesville FL 32604

phone 352.377.0133 / fax 352.377.8363 / [www.qcsinfo.org](http://www.qcsinfo.org)

QCS is the Certification Program of Florida Certified Organic Growers and Consumers, Inc. (FOG)

June 17, 2014

Renee Mann  
Regional Accreditation Manager  
USDA National Organic Program  
1400 Independence Ave., SW  
Room 2648 – South, Stop 0268  
Washington, DC 20250

Dear Ms. Mann,

Quality Certification Services (QCS) is a USDA accredited certifying agent based in Gainesville, Florida. QCS certifies crop, wild crop, livestock, and handling operations to the National Organic Program standards. This letter is a request for NOP guidance. All pertinent information is listed below in compliance with the NOP “Certifier Questions to the NOP” proper question submission format.

1. What is “At Issue,” or your “Question”

Is Rockwool or any other synthetic material able to be used as a media in a certified organic, hydroponic operation?

2. Relevant Standard

In reference to §205.105(a) of the National Organic Program, it is stated: *To be sold or labeled as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s)),” the product must be produced and handled without the use of: (a) synthetic substances and ingredients, except as provided in §205.601 or 205.603.*

3. Background

Hydroponic growing systems typically rely on an inert growing media to be used as an anchor for plant roots. Many conventional growers in the industry use Rockwool, a synthetically derived substance, as a media. Alternatively, there are many successful certified organic growers that are not using Rockwool or synthetic materials as a media, and using NOP compliant materials instead. Consistent with the NOP, the Organic Materials Review Institute (OMRI) has ruled that Rockwool is not able to be used in organic crop production as a crop fertilizer, soil amendment, crop management tool, or production aid. OMRI based their decision on §205.105(a) of the NOP rules and regulations. The rule, listed above, insists that synthetic substances are not to be used with products claiming organic status. Some grower’s and certifier’s interpretations of rule §205.105(a) are that it is not applicable to hydroponic soil media because the material stays intact in the system. It is highly unlikely that 100% of the synthetic ingredients contained in Rockwool (and similar synthetic products) stay intact in the system. These synthetic materials and plugs are subject to degradation, and worst, are in direct contact with plant material.

4. Proposed Solution

Based on the NOP regulations in place for in-ground crop production, QCS’s interpretation of §205.105(a) is that certified organic hydroponic systems should not be using Rockwool and other synthetically derived media sources as a plant media.

5. Attachment

Not Applicable



6. Urgency

Pressing; many hydroponic operations are seeking to be certified organic. These same operations need guidance on if Rockwool and other synthetically-derived materials are able to be used as a plant media source.

QCS strives to ensure that our certification program is wholly consistent with the National Organic Program standards as set forth in 7 CFR Part 205. Therefore, we greatly appreciate your guidance on this issue. Please do not hesitate to contact us with any questions you may have about this letter.

Sincerely,

Ramkrishnan,  
Chief Operating Officer

## Schurkamp, Lynnea - AMS

---

**From:** Eugenia Fraga <mefraga@foodsafety.com.ar>  
**Sent:** Tuesday, March 01, 2016 11:19 AM  
**To:** McElroy, Bridget - AMS  
**Subject:** RV: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**Attachments:** image001.jpg

Dear Bridget,  
In Food Safety we do not certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards.

Please let me know if you need something else.

Regards,



---

**De:** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **En nombre de** AMS - AIAinbox

**Enviado el:** martes, 01 de marzo de 2016 12:12 p.m.

**Para:** AMS - AIAinbox

**CC:** admin@abeeorganic.com; sarah@abeeorganic.com; ro@abeeorganic.com; info@ascorganic.com; Kat@ascorganic.com; mfigueiras@argencert.com.ar; americert@gmail.com; americert@gmail.com; organic@ausmeat.com.au; info@argencert.com.ar; lmontenegro@argencert.com.ar; jorge.larranaga@aco.net.au; organic@ausqual.com.au; elise@ausqual.com.au; dcox@baystateorganic.org; michael.baker@aco.net.au; michael.baker@aco.net.au; roxana.priego@biolatina.com.pe; baystateorganic@earthlink.net; Koble, Clinton - FSA, Reno, NV; emel.erkar@bio-inspecta.com; central@biolatina.com; baystateorganic@earthlink.net; amalia.rueda@bioagricert.org; admin@bio-inspecta.ch; central@biolatina.com; Pat.Kennelly@cdph.ca.gov; info@bioagricert.org; julia.winter@bio-inspecta.ch; accreditation@ccof.org; Bolicert@megalink.com; riccardo.cozzo@bioagricert.org; calidad@certimexsc.com; rporto@caae.es; Bolicert@bolicert.org; tom.nizet@certisys.eu; ccof@ccof.org; rporto@caae.es; saltmn@clemson.edu; ccpb@ccpb.it; Danny.Lee@cdfa.ca.gov; mitchell.yergert@state.co.us; certimex@certimexsc.com; Lewin Jake-FASConatct; jvdschootbrugge@controlunion.com; ceres@ceres-cert.com; rsetti@ccpb.it; vincent.morel@ecocert.com; info@certisys.eu; direccionejecutiva@certimexsc.com; agroecologiauna@gmail.com; organic@clemson.edu; benzing@ceres-cert.com; mefraga@foodsafety.com.ar; amy.stafford@state.co.us; Nathalie.Boes@certisys.eu; joy.mccracken@georgiacrop.com; organic@controlunion.com; organic@clemson.edu; cvanhook77@earthlink.net; info.ecocertico@ecocert.com; amy.stafford@state.co.us; goabecky@centurylink.net; aude.bonnet@ecocert.com; dszalai@controlunion.com; camila@ibd.com.br; ep@ecoglobe.am; Jeffrey.EVARD@ecocert.com; Jason.Laney@agri.idaho.gov; pdescamps@eco-logica.com; aude.bonnet@ecocert.com; Beatrice.Breuer@imo.ch; info@etko.org; nd@ecoglobe.am; Mary.nieland@iowaagriculture.gov; foodsafety@foodsafety.com.ar; pdescamps@eco-logica.com; p.perrone@icea.info; terry.hollifield@georgiacrop.com; ma@etko.org; Kristen.Branscum@ky.gov; info@globalculture.us; calidad@foodsafety.com.ar; herr@bcs-oeko.de; goaorg@centurylink.net; terry.hollifield@georgiacrop.com; a.moutapam@lacon-institut.org; lbd@lbd.com.br; globalculture@earthlink.net; monica@letis.org; Johanna.Phillips@agri.idaho.gov; goaorg@centurylink.net; scarlsen@co.marin.ca.us; imo@imo.ch; gwendal@ibd.com.br; juanantonio.mendoza@mayacert.com; info@ics-intl.com; Johanna.Phillips@agri.idaho.gov;

spwalker@mosaorganic.org; maury.wills@iowaagriculture.gov; soh@imo.ch; wippl001@umn.edu; nop@icea.info; dawn@ics-intl.com; knewkirk@mofga.org; adam.watson@ky.gov; maury.wills@iowaagriculture.gov; etyanich@mt.gov; info@bcs-oeko.de; nop@icea.info; CarltonN@co.monterey.ca.us; lacon@lacon-institut.org; adam.watson@ky.gov; kirriley.becker@nasaa.com.au; letis@letis.org; fischer@bcs-oeko.de; cfanta@naturesinternational.com; jstiles@marincounty.org; j.kopp@lacon-institut.org; jabbott@agri.nv.gov; FGIS OA, Maryland; internacional@letis.org; Victoria.Smith@agr.nh.gov; info@mayacert.com; jstiles@marincounty.org; Daniel.wunderlich@ag.state.nj.us; mosa@mosaorganic.org; FGIS OA, Maryland; SGerk@nmda.nmsu.edu; mncia@mncia.org; noe.rivera@mayacert.com; lisaengelbert@nofany.org; certification@mofga.org; cskolaski@mosaorganic.org; Bryan.Buchwald@ag.ok.gov; agrorganic@mt.gov; michelle.menken@mncia.org; leng@oda.state.or.us; agcomm@co.monterey.ca.us; yurlina@mofga.org; abrewster@ocia.org; sachin.ayachit@nasaa.com.au; gwebster@mt.gov; gestiondecalidad@oia.com.ar; nfccertification@gmail.com; Huntinggb@co.monterey.ca.us; hi.yoshida@omicnet.com; nics@naturesinternational.com; sachin.ayachit@nasaa.com.au; kyla@paorganic.org; Jennifer.Gornnert@agr.nh.gov; nfccertification@gmail.com; brian.mansfield@primuslabs.com; erich.bremer@ag.state.nj.us; dave@naturesinternational.com; byron.hamm@pro-cert.org; organic@nmda.nmsu.edu; ajepson@agri.nv.gov; thughes@nsf.org; certifiedorganic@nofany.org; Jennifer.Gornnert@agr.nh.gov; ram@qcsinfo.org; organic@oeffa.org; erich.bremer@ag.state.nj.us; dkirsanovaphillips@scscertified.com; jeff.stearns@ag.ok.gov; bbakker@nmda.nmsu.edu; rhougaard@utah.gov; info@oncert.com; lori@nofany.org; Laura@nofavt.org; cid-organic@oda.state.or.us; andy@oeffa.org; srice@agr.wa.gov; organic@tilth.org; jeff.stearns@ag.ok.gov; john.young@yolocounty.org; info@occert.com; sam@oncert.com; xiao@ofdc.org.cn; kallen@oda.state.or.us; oia@oia.com.ar; connie@tilth.org; ocd@omicnet.com; susan@occert.com; pco@paorganic.org; celder@ocia.org; PrimusOrganic@primuslabs.com; xiao@ofdc.org.cn; info@pro-cert.org; pedroalanda@oia.com.ar; qai@qai-inc.com; ocd@omicnet.com; qcs@qcsinfo.org; leslie@paorganic.org; matt.green@dem.ri.gov; deborah.mansfield@primuslabs.com; organic@scsglobalservice.com; Dave.Lockman@pro-cert.org; Sally@Demeter-USA.org; irendon@nsf.org; Organic@TexasAgriculture.gov; robin@qcsinfo.org; (b) (6) @gmail.com; matt.green@dem.ri.gov; rlarsen@utah.gov; bnauman@scsglobalservices.com; Info@nofavt.org; Sally@Demeter-USA.org; organic@agr.wa.gov; Mary.Holliman@texasagriculture.gov; dennis.chambers@yolocounty.org; (b) (6) @gmail.com; rlarsen@utah.gov; Nicole@nofavt.org; bbook@agr.wa.gov; dennis.chambers@yolocounty.org

**Asunto:** Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

#### What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

## Schurkamp, Lynnea - AMS

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**Sent:** Tuesday, September 08, 2015 2:36 PM  
**To:** Lopez, JasonJ - AMS  
**Subject:** RV: Technical Consultation  
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Best regards

Ing. Rocío Pacheco García

Area de Revisión

Usuario Skype: rocio.cmx.cmx

CERTIMEX, Certificadora Mexicana de Productos y Procesos Ecológicos, S. C.

Calle 16 de Septiembre No. 204, Ejido Guadalupe Victoria,

Oaxaca de Juárez, Oax., México. C. P. 68026

Tel. / Fax. ++ 951 5202687 / ++ 951 52 00617/ ++951 1336113

Email. Gral. [certimex@certimexsc.com](mailto:certimex@certimexsc.com)

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5. FUNDEPPO (SPP - Símbolo de Pequeños Productores) para el Mercado de Comercio Justo.

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**Sent:** Tuesday, August 04, 2015 10:17 AM

**To:** Howley, JannaB - AMS

**Subject:** Consultar a NOP

## Schurkamp, Lynnea - AMS

---

**From:** BONNET Aude <aude.bonnet@ecocert.com>  
**Sent:** Tuesday, March 01, 2016 11:48 AM  
**To:** McElroy, Bridget - AMS  
**Cc:** Yang, RobertH - AMS  
**Subject:** TR: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems  
**Attachments:** image003.jpg; image004.jpg

Dear Bridget,  
Please find Ecocert SA reply below following Cheri's email.

Bien cordialement,  
Kind regards,



**Aude BONNET**

*Scheme Manager Organic Agriculture*

[Ecocert SA - BP 47 - 32600 - L'Isle-Jourdain - France]  
T [+33 (0) 5 62 07 52 06] – M [+ (b) (6)] - F [+33 (0) 5 62 07 66 19]  
[aude.bonnet@ecocert.com](mailto:aude.bonnet@ecocert.com)  
[www.ecocert.com](http://www.ecocert.com)

**MEILLEURS  
VOEUX  
2016**  
FELICES FIESTAS  
FELICE ANNO NUOVO  
أجمل التمنيات

**FROHES NEUES JAHR 致以有机的  
BOAS FESTAS CELE MAI FRUMOASE  
SEASON'S GREETING  
明けましておめでとうございます  
2016 YENI YILINIZ KUTLU OL  
MIRARY SOA नया साल मुबार  
NAJLEPŠE ŽELJE MANIGONG BAGONG**

---

**De :** Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **De la part de** AMS - AIAinbox

**Envoyé :** mardi 1 mars 2016 16:12

**À :** AMS - AIAinbox <AIAinbox@ams.usda.gov>

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**Objet** : Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply.

Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

**Questions for Certifying Agents:**

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? **NO**

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify? **0**

In what state or country (if international) are the certified operations located (list)? **/**

What crops do these certified operations produce (list)? **/**

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: [bridget.mcelroy@ams.usda.gov](mailto:bridget.mcelroy@ams.usda.gov). You can also contact Bridget with any questions that you have.

Regards,  
Cheri Courtney  
Director, Accreditation and International Activities Division

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