

# 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**

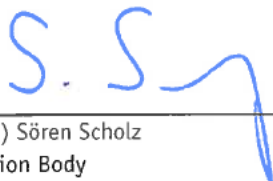
2018-02-28

**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.

2015-02-24

  
Dipl.-Wi.-Ing. (FH) Sören Scholz  
Head of Certification Body



# 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

---

**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



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

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Sarah

Sarah Costin  
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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@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.marlin.ca.us' <scarsen@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>; '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>;

'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.

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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  
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---

**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

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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

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## 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)

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

---

**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)

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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



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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)

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:** 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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**To:** Sarah Costin; Ro Elgas  
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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)

---

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

**Til:** Sarah Costin; Ro Elgas

**Cc:** Bjarne B. Pedersen

**Emne:** Fwd: Update

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Sarah and Ro,

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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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Please advise.

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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**



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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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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.

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Direct no.: +45 7614 7663  
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**Sendt:** 24. februar 2015 01:20  
**Til:** Pierre Sleiman  
**Cc:** Bjarne B. Pedersen  
**Emne:** Re: Update

Hi Pierre

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

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

Best regards  
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**Cc:** Ro Elgas  
**Subject:** Question about a container

**Follow Up Flag:** Follow up  
**Due By:** Tuesday, February 17, 2015 1:00 PM  
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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  
direct (831) 346-6234

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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**  
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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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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  
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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,

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1. Biological activity within the growing media/substrate
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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

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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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**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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**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.

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

Regards,

**Robert Yang**  
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**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

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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)

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)

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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,

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

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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

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

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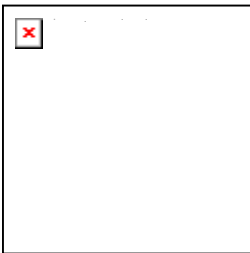
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**From:** Fabia Montalbani [mailto:[fabia.montalbani@icea.bio](mailto:fabia.montalbani@icea.bio)]  
**Sent:** Thursday, May 19, 2016 4:09 AM  
**To:** Gebault King, ReneeA - AMS <[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)>  
**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

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**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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---

**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 style 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**  
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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)

---

**Ellegaard as**

Storstrømsvej 55

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)  
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]  
760.634.2506  
495 Saxony Rd  
Encinitas, CA 92024

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

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## 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  
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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:** 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



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 (b) (6)

O 760.634.2506

495 Saxony Rd

Encinitas, CA 92024

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

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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,

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 <[LJ@blackmoreco.com](mailto:LJ@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.

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Best Regards,

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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)

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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

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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

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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:

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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)

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## 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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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

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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:** 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.  
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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.

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Kind regards,

*Renée*

Renée Gebault King, Ph.D.  
Accreditation Manager

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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



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**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:** 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 Darbinyan (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

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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:** 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:

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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- 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:** 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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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:

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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:

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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