Renee,

My draft response:

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
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
Hello Stacy,
This is a follow-up to the first message Cheri sent to you regarding rockwool.

Kind Regards,
Renee

Ms. Renee Mann
Assistant Director, Accreditation and International Activities Division
USDA National Organic Program
(202) 205-9643 - New phone number
NOP website
Sign up for our newsletter, the USDA Organic Insider

Re: Rockwool Use in organic hydroponic production

EcoCert-IMO. Client informed QCS they are switching because EcoCert is allowing rockwool. QCS confirmed it via phone call between QCS and EcoCert-IMO on June 16, 2014.

Our big picture here is to get a guidance from NOP whether rockwool would be allowed in Hydroponic/Aquaponics. This will create consistency and clients do not have to switch certifiers depending on who allows what.

A guidance would be much appreciated.

Thanks,
Ramkrishnan

Hello Ram:
Thank you for your inquiry. In order to process such a request, I need to know what other certifier you are in disagreement with and what evidence you have that they allow rockwool.
Thank you,
Renee

Ms. Renee Mann
Assistant Director, Accreditation and International Activities Division
USDA National Organic Program
(202) 260-8635
NOP website
Sign up for our newsletter, the USDA Organic Insider

From: Ramkrishnan P.B. [mailto:ram@qcsinfo.org]
Sent: Tuesday, June 17, 2014 3:17 PM
To: Mann, Renee - AMS
Cc: denise aguero
Subject: Rockwool Use in organic hydroponic production

Renee,

QCS is seeking guidance of rockwool in hydroponics. QCS refused to allow rockwool to be a media for crop growth in hydroponic and come in contact with organic crop. Rockwool is a synthetic. The client switched to another certifier who allows rockwool for organic hydroponic production. We were advised by NOP that when certifiers disagree to bring it to NOP attention.

A guidance on whether rockwool is allowed or not will be helpful. Question attached.

Thanks,
Ramkrishnan

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Good morning, Dr. Darbinyan!

I am forwarding your questions to Robert Yang, your Accreditation Manager, as he will be best able to answer them.

Thank you!

Stacy

------------------------------
Stacy Swartwood
Program/Systems Analyst
USDA/AMS National Organic Program
South Building Room 2649, Ag Stop 0268
202/260-9443
stacy.swartwood@ams.usda.gov

From: Nune Darbinyan [mailto:nuneemil@yahoo.com]
Sent: Monday, May 16, 2016 5:31 AM
To: MaryLou Lusby <marylou.lusby@ams.usda.gov>; Swartwood, Stacy - AMS <stacy.swartwood@ams.usda.gov>
Subject: Two quick questions from EGLO

Dear NOP officers,

Probably our Regional Manager is away for audit duties. I need a fast answer to two questions which I have and need to respond inquiries asap.

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?

Best regards, Ms. Nune Darbinyan

Liebe Grüße, Frau Nune Darbinyan

Dr. Nune Darbinyan
General Director
ECOGLOBE

Contact information:
Tel: +37410221295
Tel mob: [redacted]
Fax: +37410221295
E-mail: nd@ecoglobe.am
Internet: www.ecoglobe.am

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

Mind about environment before printing!

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Julie,
I have our hydroponics answer for you. We still have four:

- Jonathan Sprouts, Inc. – variety of vegetable sprouts
- California Vegetable Specialties – Belgian Endive
- Pear Garden Produce – Mung bean sprouts and Soy bean sprouts
- Jonathan’s Organic – variety of vegetable sprouts

I hope this fulfills your request. Let me know if you need anything else.

Sincerely,
Craig

Craig S. Morr
Director, Quality
NSF International
734.769.5143

Quality Assurance International
9191 Towne Centre Drive
Suite 200
San Diego, California 92122
United States of America

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Good afternoon Bridget,

I'm answering your "Questions for Certifying Agents":

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?
Yes
If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?
10 currently certified, 1 in process (7 hydroponic, 4 aquaponic, no aeroponic)
In what state or country (if international) are the certified operations located (list)?
Alaska: 1; California: 7; Colorado: 2; Virginia 1
What crops do these certified operations produce (list)?
Arugula, Baby lettuce, Basil, Bell peppers, Brassicas, Chard, Cucumbers, Greens, Green beans, Herbs, Kale, Lettuce-Head, Lettuce- Leaf, Mints, Mizuna, Onions, Snap peas, Sorrel, Spinach, Sprouts, Summer Squash, Tatsoi, Tomatoes, Upland cress, Watercress, Wheatgrass

We look forward to hearing more on hydroponic/aquaponic/aeroponic systems as they fit into the USDA NOP.

Sarah Costin
Co-Creator/Owner
A Bee Organic
Virtually Accessible Worldwide
760-731-0155 Ext. 103

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Renee 1 and Renee 2!!!

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

Following is my draft response to her question on aquaponics. I tried to find the info “the latest information the NOP sent” to which she was referring, but no luck. I’d like to link to some info, but aside from the CFR, I wasn’t able to find something really useful. Ideas? I’d appreciate you taking a quick review of my response to ensure it is correct before it goes out. Thanks! RGK

[b] (5) [b]

There are two Renees at the USDA NOP, which can be a little confusing. In future, please direct your questions to your current Accreditation Manager, Renée Gebault King, at ReneeA.GebaultKing@ams.usda.gov.

If you have more questions or need more information, please let me know.

Kind regards,
Hi Renee GK –
Please respond to Georgana and remind her to send messages to you.

Thanks,
Renee M

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

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.
Schurkamp, Lynnea - AMS

From: McEvoy, Miles - AMS
Sent: Monday, August 25, 2014 4:44 PM
To: Brines, Lisa - AMS
Subject: RE: CCOF / A Bee Organics - Hydroponics Product

Please put through materials clarification process.

---

From: Brines, Lisa - AMS
Sent: Wednesday, August 20, 2014 4:00 PM
To: McEvoy, Miles - AMS
Subject: FW: CCOF / A Bee Organics - Hydroponics Product

FYI. CCOF notice of discrepancy with A Bee Organics (hydroponics products)

---

From: Brines, Lisa - AMS
Sent: Wednesday, May 21, 2014 1:01 PM
To: devon@ccof.org
Cc: jake@ccof.org; Rakola, Betsy - AMS; Mann, Renee - AMS
Subject: RE: Notification per PM 11-4 Oasis Grower Solutions Growth Media

Dear Mr. Patillo:

Thank you for contacting the USDA National Organic Program. We have received your notification below regarding a possible discrepancy regarding the status of the products Horticubes and Rootcubes for crop production under the USDA organic regulations.

The information you provided is under review. We will contact you by email if additional information is needed to determine whether the regulations have been properly applied in evaluating this product.

If you have any further questions, please do not hesitate to let me know.

Sincerely,

Lisa M. Brines, Ph.D.
National List Manager
Standards Division, National Organic Program
USDA Agricultural Marketing Service
Direct: 202-821-9683
lisa.brines@ams.usda.gov


---

From: AMS - Guidance, NOP
Sent: Tuesday, May 20, 2014 8:07 PM
Per NOP Policy Memo 11-4, CCOF is providing NOP with this notification.

CCOF differs from A Bee Organic in our evaluation of the product “Horticubes” and “Rootcubes” by Oasis Grower Solutions. See [http://www.oasiseasyhydro.com/oasis-easy-hydro-horticubes-product.asp](http://www.oasiseasyhydro.com/oasis-easy-hydro-horticubes-product.asp). These are growing media products used in hydroponic systems.

CCOF is evaluating hydroponic growing media based on 1) determination of synthetic vs. non-synthetic status, and 2) the potential for uptake and/or translocation of synthetic materials via root-media interaction.

As we understand it, this is a phenolic foam product based on phenol-formaldehyde chemistry with added surfactants, colorants, and catalysts (see attached). Therefore, we find these material to be synthetic and not allowed per the National List. This is based on information provided by the manufacturer about the manufacturing process (attached).

Furthermore, we expect plant roots to permeate the growing media and therefore expect significant root-media interaction (compared to a Styrofoam block used to float plants, for instance). Our evaluation of the potential for root-media interactions is supported by evidence presented in the attached document (page 3) disclosing that analysis of plants grown on these products indicate presence of surfactants and sulfonic acids. These are synthetic products involved in the manufacture of the products.

CCOF has not allowed our certified hydroponic operations to use these specific products and have communicated the same position on a number of similar products. We also understand our review practices to be aligned with OMRI’s policies and those of other accredited certifiers.

We have communicated in the past with Ron Elgas at A Bee Organic on this issue and he has notified us that they differ from CCOF in our conclusion on this material.

Please let me know if you need anything else from CCOF. We look forward to hearing from you soon.

Regards,

Devon Pattillo
Livestock Certification Supervisor & Materials Coordinator
CCOF
2155 Delaware Ave., Suite 150
Santa Cruz, CA 95060
(831) 423-2263, ext. 39
fax (831) 423-4528
[www.ccof.org](http://www.ccof.org)
Visit CCOF on [Facebook](http://www.facebook.com) and [Twitter](http://twitter.com)
Thank you, Jeanne!

Hello Bridget,

Georgia Crop Improvement Association currently does not certify Hydroponics, Aquaponics, or Aeroponics. We would certify Hydroponics if asked.

Regards,

Jeanne C. Gonzales
Organic Administrative Assistant
Georgia Crop Improvement Association Organic Certification Program
GCIAOCP
2425 S. Milledge Avenue
Athens, Georgia 30605
Phone: 706-542-2351
Fax: 706-542-9397
Email: jeanne.gonzales@georgiacrop.com
Website: www.georgiacrop.com

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Hello Julie,

Thank you for your response. I will look forward to hearing from Cheri Courtney regarding our questions listed below. I appreciate your help.

Regards,

Jeanne Gonzales
GCIAOCP

---

Good afternoon Jeanne,

My apologies for not replying to your email. I have been out of the office for an extended period of time. I am forwarding your questions and information below to my supervisor, Cheri Courtney.

Thank you for your patience,

Julie

---

Hi Judith,

I have sent Julie Hartley some messages recently but it seems she is not available to receive them. I’m wondering who our contact person should be if not Julie? We have three items to address with her.

1) How do we go about becoming a certifier for Hydroponics?
2) Label issue: One of our Handlers has a label that identifies them with a code. They package the product for Can they use a code instead of their name and address?
3) We need to notify someone of changes made in our Organic Certification Committee. *(See email below)*

Can you help us with these items or can you direct us to someone who can?

Thanks for your help!
Hello Julie,

I was told that you are the person I should notify of changes that have taken place in the Organic Certification Committee of Georgia Crop Improvement Association.

James Sutton and Relinda Walker are no longer members of the Committee. Mike Evans from the Georgia Department of Agriculture is being added as an Ex Officio member.

Regards,

Jeanne C. Gonzales
Organic Department
Georgia Crop Improvement Association, Inc.
2425 S. Milledge Avenue
Athens, GA 30605
Phone: 706-542-2351
Fax: 706-542-9397
Email: gacrop3@bellsouth.net
www.certifiedseed.org

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Schurkamp, Lynnea - AMS

Hi Emily,

Excellent! Thanks for the clarification.

Bridget

From: Emily Garcia [mailto:Emily.Garcia@primusauditingops.com]
Sent: Thursday, April 07, 2016 12:13 PM
To: McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>
Cc: PrimusOrganic <PrimusOrganic@primuslabs.com>; AuditQA <auditqa@primusauditingops.com>
Subject: RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget,

All operations fall within category 2 (containers). Please let me know if you need more information.

Best,

Emily Garcia
QA Specialist
Emily.Garcia@primusauditingops.com
Office 805.631.5248 | Direct Line 805.623.5542
Fax 805.352.1364
1259 Furukawa Way | Santa Maria | CA

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From: "McElroy, Bridget - AMS" <Bridget.McElroy@ams.usda.gov>
Date: Tuesday, April 5, 2016 at 10:28 AM
To: Emily Garcia <Emily.Garcia@primusauditingops.com>
Cc: PrimusOrganic <PrimusOrganic@primuslabs.com>, AuditQA <auditqa@primusauditingops.com>
Subject: RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Emily,
Thank you again for sharing your information regarding certification of hydroponic production. As we go through the results, we are realizing that it would be helpful to have slightly more detailed information from certifiers in an effort to differentiate between production that is more clearly hydroponic and production which falls more under “container” production. We know that the systems out there are quite diverse and the continuum from in ground, to container, to hydroponic production can make it challenging to know where to draw the line. For this survey, it would simply be helpful to know how many of the operations that you are certifying are:

1. Systems like NFT, raft, ebb and flow (hydroponic)
2. Systems like pots, upright bags, Dutch bucket (“container”)
3. And systems that fall under #1 but use fish waste for fertility (aquaponics)

Among the 28 operations that you are certifying, would you consider them all to be hydroponic and aquaponic, or are some closer to container production?

Regards,

Bridget McElroy
Policy Analyst
USDA National Organic Program
1400 Independence Ave. SW
Room 2646-S. (Stop 0268)
Washington, D.C. 20205
(202) 260-9288

From: Emily Garcia [mailto:Emily.Garcia@primusauditingops.com]
Sent: Friday, March 11, 2016 1:48 PM
To: McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>
Cc: PrimusOrganic <PrimusOrganic@primuslabs.com>; AuditQA <auditqa@primusauditingops.com>
Subject: RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hello Bridget,

Please see Primus Labs responses in Red:

1. <!--[if !supportLists]-->Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? Yes, we certify hydroponic operations
2. <!--[if !supportLists]-->If you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards, how many of these operations do you currently certify? 28
3. <!--[if !supportLists]-->In what state or country (if international) are the certified operations located (list)?
   California
   Mexico
4. What crops do these certified operations produce (list)?
   Raspberries
   Blueberries
   Butter lettuce

Let me know if you have any questions.

Best,

Emily Garcia
QA Specialist
Emily.Garcia@primusauditingops.com
Office805.631.5248| Direct Line805.623.5542
Fax805.352.1364
1259 Furukawa Way|Santa Maria|CA
From: Baron, Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] On Behalf Of AMS - AIAInbox
Sent: Tuesday, March 01, 2016 7:12 AM
To: AMS - AIAInbox <AIAInbox@ams.usda.gov>
Cc: admin@abeeorganic.com; sarah@abeeorganic.com; ro@abeeorganic.com; info@ascorganic.com; Kat@ascorganic.com; mfigueiras@argercert.com.ar; americanert@gmail.com; americanert@gmail.com; organic@ausmeat.com.au; info@argercert.com.ar; lmontenegro@argercert.com.ar; jorgelarranaga@aco.net.au; organic@ausqual.com.au; elise@ausqual.com.au; dcox@baystateorganic.org; michael.baker@aco.net.au; michael.baker@aco.net.au; roxana.priego@biolatina.com.pe; baystateorganic@earthlink.net; Koble, Clinton - FSA, Reno, NV <clinton.koble@nv.usda.gov>; emel.erkran@bio-inspectsa.com; central@biolatina.com; baystateorganic@earthlink.net; amalia.rueda@bioagricert.org; admin@bio-inspectsa.ch; central@biolatina.com; Pat.Kennelly@cdph.ca.gov; info@bioagricert.org; julia.winter@bio-inspectsa.ch; accreditation@ccof.org; Bolicert@meaglink.com; riccardo.cozzo@bioagricert.org; calidad@certimexsc.com; rporto@caae.es; Bolicert@bolicert.org; tom.nizet@certisyseu; ccof@ccof.org; rporto@caae.es; saltmn@clemson.edu; ccppb@ccpb.it; Danny.Lee@cdfa.ca.gov; Mitchell.yergett@state.co.us; certimex@certimexsc.com; Lewin Jake-FASConatct; <jake@ccof.org>; jvdschootbrugge@controlunion.com; certifiedorganic@nofany.org; sam@onecert.com; susan@occert.com; mfigueiras@argercert.com.ar; mitchell.yergert@state.co.us; info@ecoglobe.am; info@etko.org; info@globalculture.us; gwendal@ibd.com.br; joy.mccracken@georgiacrop.com; info.ecocertico@ecocert.com; benzing@ceres.com; mefraga@foodsafety.com.ar; amy.stafford@state.co.us; Nathalie.Boes@certisyseu; joy.mccracken@georgiacrop.com; organic@controlunion.com; organic@clemson.edu; cvanhook77@earthlink.net; info.ecocertico@ecocert.com; amy.stafford@state.co.us; goabecky@centurylink.net; audبون@ت@ة@ت; nsal@bioa.org; fr@abeeorganic.com; foodsa@foodsafoodsc.com; spdescamps@eco-logo.ca; audبون@ت@ة@ت; Beatrice.Breuer@imo.ch; info@etko.org; nd@ecoglobe.am; Mary.nieland@iowaagriculture.gov; foodsa@foodsafoodsc.com; spdescamps@eco-logo.ca; p.perrone@icea.info; terry.hollifield@georgiacrop.com; ma@etko.org; Kristen.Branscum@ky.gov; info@globalculture.us; calidad@foodsafoodsc.com.ar; herr@bsc-oeoko.de; goaorg@centurylink.net; terry.hollifield@georgiacrop.com; a.moutapam@lacon-institut.org; lbd@lbdb.com.br; globalculture@earthlink.net; monica@letis.org; Johanna.Phillips@agri.idaho.gov; goaorg@centurylink.net; scarslen@co.marin.ca.us; imo@imo.ch; gwendal@lbdb.com.br; juanantonio.mendoza@mayacert.com; info@ics-intl.com; Johanna.Phillips@agri.idaho.gov; spwalker@mosaorganic.org; maury.wills@iowaagriculture.gov; soh@imo.ch; wipplo01@umn.edu; nop@icea.info; dawn@ics-intl.com; knewkirk@mofga.org; adam.watson@ky.gov; maury.wills@iowaagriculture.gov; etyanich@mt.gov; info@bsc-oeoko.de; nop@icea.info; CarltonN@co.monterey.ca.us; lacon@lacon-institut.org; adam.watson@ky.gov; kirrilley.becker@nasaa.com.au; letis@letis.org; fischer@bsc-oeoko.de; cfanta@naturesinternational.com; jstiles@marincounty.org; j.kopp@lacon-institut.org; jabbott@agri.nv.gov; FGIS OA, Maryland <Deanna.Baldwin@maryland.gov>; internacional@letis.org; Victoria.smith@agr.nh.gov; info@mayacert.com; jstiles@marincounty.org; Daniel.wunderlich@ag.state.nj.us; mosa@mosaorganic.org; FGIS OA, Maryland <Deanna.Baldwin@maryland.gov>; SGerK@nmnda.nmsu.edu; mncia@mncia.org; noe.rivera@mayacert.com; lisaengelbert@nofany.org; certification@mofga.org; cskolaski@mosaorganic.org; Bryan.Buchwald@ag.ok.gov; agorganic@mt.gov; michelle.menken@mncia.org; leng@oda.state.or.us; acgmm@co.monterey.ca.us; yur@mafo.org; abrewster@ocia.org; sachin.ayachit@nasaa.com.au; ngwebster@mt.gov; gestiondecialidad@oa.com.ar; nfccertification@gmail.com; Huntinggb@co.monterey.ca.us; hi.yoshida@omicnet.com; nics@naturesinternational.com; sachin.ayachit@nasaa.com.au; kyla@paorganic.org; Jennifer.Gornnert@agr.nv.gov; nfccertification@gmail.com; brian.mansfield@primuslabs.com; erich.bremer@ag.state.nj.us; dave@naturesinternational.com; byron.ham@pro-cert.org; organic@nmnda.nmsu.edu; ajepsson@agri.nv.gov; thughes@nsf.org; certifiedorganic@nofany.org; Jennifer.Gornnert@agr.nv.gov; ram@qcsinfo.org; organic@oefa.org; erich.bremer@ag.state.nj.us; dkirsonovaphillips@scsctertified.com; jeff.stearns@ag.ok.gov; bbakker@nmnda.nmsu.edu; rhougaard@utoh.gov; info@onecerct.org; lori@nofany.org; Laura@nofavt.org; cid-organic@oda.state.or.us; andy@oef.org; srice@agr.wa.gov; organic@tilth.org; jeff.stearns@ag.ok.gov; young@yolocounty.org; info@occert.org; sam@onecerct.org; xiao@ofdc.org.cn; kallen@oda.state.or.us; oia@oda.com.ar; connie@tilth.org; ocd@omicnet.com; susan@occerct.org; pco@paorganic.org; celder@ocia.org; PrimusOrganic <PrimusOrganic@primuslabs.com>; xiao@ofdc.org.cn; info@pro-cert.org; pedroalanda@quia.org.com.ar; qai@qai-inc.com; ocd@omicnet.com; qcs@qcsinfo.org; leslie@paorganic.org; matt.green@dem.ri.gov; Deborah Mansfield <deborah.mansfield@primusauditingops.com>; organic@scslsblservice.com; Dave.Lockman@pro-cert.org; Sally@Demeter-USA.org; irendon@nsf.org; Organic@TexasAgriculture.gov; robin@qcsinfo.org; (b) (6) @gmail.com

[3]
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 aquaponic 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. You can also contact Bridget with any questions that you have.

Regards,

Cheri Courtney
Director, Accreditation and International Activities Division

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Thank you, Katherine!

Questions for Certifying Agents:

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

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

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

What crops do these certified operations produce (list)? Micro leafy greens

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Katherine Borchard, ASCO Program Director

Agricultural Services Certified Organic
PO Box 4871, Salinas, CA 93912
P: 831.449.6365 F: 831.975.4414
From: Baron, Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] On Behalf Of AMS - AIAirinbox
Sent: Tuesday, March 01, 2016 7:12 AM
To: AMS - AIAirinbox
Cc: admin@abeeorganic.com; sarah@abeeorganic.com; ro@abeeorganic.com; Cathee Escobar; Katherine Borchard; mfigueiras@argencert.com.ar; americer@gmail.com; americer@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.ch; central@biolatina.com; baystateorganic@earthlink.net; amalia.rueda@bioagricert.org; admin@bio-inspecta.ch; central@biolatina.com; Pat.Kennelly@cdph.ca.gov; info@bioagricert.org; julia.winter@bio-inspecta.ch; accreditation@ccof.org; Bolicert@mealinqual.com; ricardoo.cozzo@bioagricert.org; calidad@certimexsc.com; rporto@caae.es; Bolicert@bolicert.org; tom.nizet@certisys.eu; ccof@ccof.org; rporto@caae.es; saltm@clemson.edu; ccppb@ccppb.it; Danny.Lee@cdfa.ca.gov; jess.martinez@state.co.us; certimex@certimexsc.com; Lewin J - FASConatct; jvdsochtbrugge@controlunion.com; ceres@ceres-cert.com; rsettib@ccppb.it; vincent.morel@ecocert.com; info@ceres.com; direccionejecutiva@certimexsc.com; agroecologiauna@gmail.com; organic@clemson.edu; benzing@ceres-cert.com; mefrega@foodsafety.com.ar; amystafford@state.co.us; Nathalie.Boes@certisys.eu; joy.mccracken@georgiaqcrop.com; organic@controlunion.com; organic@clemson.edu; cvanhooke@earthlink.net; info.ecocertico@ecocert.com; amy.stafford@state.co.us; goabecky@centurylink.net; aude.bonnet@ecocert.com; dszalai@controlunion.com; camila@ibd.com.br; ep@ecoglobe.am; Jeffry.ERARD@ecocert.com; Jason.Laney@agri.idaho.gov; pdescamps@eco-logica.com; aude.bonnet@ecocert.com; Beatrice.Breuer@imo.ch; info@etko.org; nd@ecoglobe.am; Mary.nieland@iowaagriculture.gov; foodsafety@foodsafety.com.ar; pdescamps@eco-logica.com; pperrone@icea.info; terry.hollifield@georgiaqcrop.com; ma@etko.org; Kristen.Branscum@ky.gov; info@globalculture.us; calidad@foodsafety.com.ar; herr@bcs-oeoko.de; goaorg@centurylink.net; terry.hollifield@georgiaqcrop.com; a.moutapam@laco-institut.org; lb1@lb1.com.br; globalculture@earthlink.net; monica@letis.org; Johanna.Phillips@agri.idaho.gov; goaorg@centurylink.net; scarslen@co.marin.ca.us; imo@imo.ch; gwendall@ibd.com.br; juanantonio.mendoza@mayacert.com; info@ics-intl.com; Johanna.Phillips@agri.idaho.gov; spwalkler@mosaorganic.org; marwills@iowaagriculture.gov; soh@imo.ch; wippol001@umn.edu; nop@icea.info; dawn@ics-intl.com; knewkirk@mofga.org; adan.watson@ky.gov; marwills@iowaagriculture.gov; etyanich@mt.gov; info@bcs-oeoko.de; nop@icea.info; CarltonN@co.monterey.ca.us; lacon@laco-institut.org; adan.watson@ky.gov; kirlilley.becker@nasa.com.au; letis@letis.org; fischer@bcs-oeoko.de; cjflanta@naturesinternational.com; jstiles@marincounty.org; i.kopp@laco-institut.org; jabbott@agri.nv.gov; FGIS OA, Maryland; internacional@letis.org; Victoria.Smith@agr.nh.gov; info@mayacert.com; jstiles@marincounty.org; Daniel.wunderlich@ag.state.nj.us; mosa@mosaorganic.org; FGIS OA, Maryland; SGerk@nmda.nmsu.edu; mncia@mncia.org; noe.rivera@mayacert.com; lisaengelbert@nofany.org; certification@mofga.org; cskolaski@mosaorganic.org; Bryan.Buchwald@ag.ok.gov; agrorganic@mt.gov; michael.menken@mncia.org; leng@oda.state.or.us; agcomm@co.monterey.ca.us; yurlina@mofga.org; abrewster@oca.org; sachin.ayachit@nasa.com.au; gwebster@mt.gov; gestiondecialidad@oia.com.ar; nfccertification@gmail.com; Huntinggb@co.monterey.ca.us; hi.yoshida@omicnet.com; nics@naturesinternational.com; sachin.ayachit@nasa.com.au; kyla@paorganic.org; Jennifer.Gornert@agr.ngh.gov; nfccertification@gmail.com; brian.mansfield@primuslabs.com; erich.bremer@ag.state.nj.us; dave@naturesinternational.com; byron.hamm@pro-cert.org; organic@nmda.nmsu.edu; ajcassidy@agri.nv.gov; thughes@nsf.org; certifiedorganic@nofany.org; Jennifer.Gornert@agr.ngh.gov; ram@qcsinfo.org; organic@eefa.org; erich.bremer@ag.state.nj.us; dkirsanovichphilips@scscertified.com; jeff.stearns@ag.ok.gov; bbakker@nmda.nmsu.edu; rbaygaard@utah.gov; info@onecert.com; jori@nofany.org; Laura@nofavt.org; cid-organic@oda.state.or.us; andy@oeea.org; srice@agr.wa.gov; organic@tilth.org; jeff.stearns@ag.ok.gov; john.young@yolocounty.org; info@ocert.org; sam@onecert.com; xiao@ofdc.org.cn; kallen@oda.state.or.us; oia@oia.com.ar; connie@tilth.org; ocd@omicnet.com; susan@ocert.org; paco@paorganic.com; celider@ocia.org; PrimusOrganic@primuslabs.com; xiao@ofdc.org.cn; info@pro-cert.org; pedrolanda@oda.com.ar; qai@qai-inc.com; ocd@omicnet.com; qcs@qcsinfo.org; Leslie@paorganic.org; matt.green@dem.ri.gov; deborah.mansfield@primuslabs.com; organic@scsglobalservice.com; Dave.Lockman@pro-cert.org; Sally@Demeter-USA.org; irendon@nsf.org; Organic@TexasAgriculture.gov; robing@qcsinfo.org; [2] (6) @gmail.com; matt.green@dem.ri.gov; rlarsen@utah.gov; bnauman@scsglobalservice.com; Info@nofavt.org; Sally@Demeter-USA.org; organic@agr.wa.gov; Mary.Holliman@texasagriculture.gov; dennis.chambers@yolocounty.org; [2] (6) @gmail.com; rlarsen@utah.gov; Nicole@nofavt.org; bbook@agr.wa.gov; dennis.chambers@yolocounty.org
Subject: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.
Dear Certifiers:
The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

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

- Deep flow/raft
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- Ebb and flow
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- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

Questions for Certifying Agents:

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

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

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

What crops do these certified operations produce (list)?

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

Regards,
Cheri Courtney
Director, Accreditation and International Activities Division

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Thanks, Renee! That makes sense.

Hi Bridget:
I’d say a response from 40 certifiers is pretty good, and fairly typical. If it’s not a listed as a requirement (i.e. submitting the annual list of certified operations), [B] (5)[5][5][5][5]. We can send an update out today – I’m sure a reminder won’t hurt.

-Renee

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

Good morning Renee,

So, I heard back from 41 of 80 certifiers for this survey on hydroponics. Is that the standard level of response from ACAs when we send things like this out, or do you think we could push to hear from more of them? I was thinking that maybe Anne could send out a reminder, but I don’t want to bug them too much over a small thing like this. We only heard from a couple of ACAs who said they certify hydroponic operations and back in 2013 it was about 8. Perhaps some stopped certifying them or they just forgot to respond....or they don’t want to broadcast that they do it.

Let me know what you think is the best thing to do. Thanks again to AIA for the help on this!

Bridget
From: Mann, Renee - AMS  
Sent: Tuesday, March 01, 2016 11:00 AM  
To: McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
Subject: RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

It went to the 80 accredited certifiers, and the California State Organic Program (so they know what we’re asking of the certifiers).

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

From: McElroy, Bridget - AMS  
Sent: Tuesday, March 01, 2016 10:55 AM  
To: Mann, Renee - AMS <Renee.Mann@ams.usda.gov>  
Subject: RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Oh, how many ACAs total did it go to?

From: Mann, Renee - AMS  
Sent: Tuesday, March 01, 2016 10:35 AM  
To: McElroy, Renee - AMS <Renee.Mann@ams.usda.gov>  
Subject: FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

FYI

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

From: Baron, Anne - AMS  
Sent: Tuesday, March 01, 2016 10:29 AM  
To: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>; Crail, Lars - AMS <Lars.Crail@ams.usda.gov>; Gebault King, ReneeA - AMS <ReneeA.GebaultKing@ams.usda.gov>; Lopez, JasonJ - AMS <JasonJ.Lopez@ams.usda.gov>; Lusby, MaryLou - AMS <MaryLou.Lusby@ams.usda.gov>; Mann, Renee - AMS <Renee.Mann@ams.usda.gov>; Yang, RobertH - AMS <RobertH.Yang@ams.usda.gov>; Zuck, Penelope - AMS <Penelope.Zuck@ams.usda.gov>; Adams, Edith - AMS <Edith.Adams@ams.usda.gov>; Caceres, Miguel - AMS <Miguel.Caceres@ams.usda.gov>; Friesenhahn, Martin - AMS <Martin.Friesenhahn@ams.usda.gov>; Gilbert, Corey - AMS <Corey.Gilbert@ams.usda.gov>; Heckart, Patricia - AMS <Patricia.Heckart@ams.usda.gov>; Hildreth, David - AMS <David.Hildreth@ams.usda.gov>; Horne, Willy - AMS <Willy.Horne@ams.usda.gov>; Kohles,alan - AMS <alan.kohles@ams.usda.gov>; Lopez, Mike - AMS <Mike.Lopez@ams.usda.gov>; Matejovsky, Kathryn - AMS <Kathryn.Matejovsky@ams.usda.gov>; Ross, Steve - AMS <Steve.Ross@ams.usda.gov>; Schoop, Jamie - AMS <Jamie.Schoop@ams.usda.gov>; Skinner, Rick - AMS <Rick.Skinner@ams.usda.gov>; Wilson, Darrell - AMS <Darrell.Wilson@ams.usda.gov>; Gebel, Kelley - AMS <Kelley.Gebel@ams.usda.gov>; McEvoy, Miles - AMS <Miles.McEvoy@ams.usda.gov>; Tucker, Jennifer - AMS <Jennifer.Tucker@ams.usda.gov>; Nelson, Kristen - AMS <Kristen.Nelson@ams.usda.gov>; Lewis, Paul I - AMS <Paul.Lewis@ams.usda.gov>; Holmes, Vella - AMS <Vella.Holmes@ams.usda.gov>; Michael, Matthew - AMS

Join the NOP mailing list.
Dear AIA staff, NOP Management Team and QAD auditors,

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

Regards,
Alvik Joseph

From: Baron, Anne - AMS On Behalf Of AMS - AIAinbox
Sent: Tuesday, March 01, 2016 10:12 AM
To: AMS - AIAinbox  <AIAinbox@ams.usda.gov>
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>; 'mericert@gmail.com' <mericert@gmail.com>; 'mericert@gmail.com' <mericert@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>; 'joy.mccracken@georgiacrop.com' <joy.mccracken@georgiacrop.com>; 'dcox@baystateorganic.org' <dcox@baystateorganic.org>; 'mitchell.yergert@state.co.us' <mitchell.yergert@state.co.us>; '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>; 'jvdschootbrugge@controlunion.com' <jvdschootbrugge@controlunion.com>; 'ceses@ceres-cert.com' <ceses@ceres-cert.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@certisyse.eu' <tom.nizet@certisyse.eu>; 'ccofof@ccofof.org' <ccofof@ccofof.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>; 'lewinn.jake-fascmatct@jake@ccof.org' <lewinn.jake-fascmatct@jake@ccof.org>; 'jdschootbrugge@controlunion.com' <jdschootbrugge@controlunion.com>; 'ceses@ceres-cert.com' <ceses@ceres-cert.com>; 'rsetti@ccpb.it' <rsetti@ccpb.it>; 'vincent.morel@ecocert.com' <vincent.morel@ecocert.com>; 'info@certisyse.eu' <info@certisyse.eu>; 'direccionejecutiva@certimexsc.com' <direccionejecutiva@certimexsc.com>; 'agroecologiana@gmail.com' <agroecologiana@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@certisyse.eu' <Nathalie.Boes@certisyse.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@ecocertico.com' <info.ecocertico@ecocertico.com>; 'amy.stafford@state.co.us' <amy.stafford@state.co.us>; 'goabecky@centurylink.net' <goabecky@centurylink.net>; 'au.debonnet@ecocert.com' <au.debonnet@ecocert.com>; 'dszlai@controlunion.com' <dszlai@controlunion.com>; 'camila@ibd.com.br' <camila@ibd.com.br>; 'ep@ecoglobe.am' <ep@ecoglobe.am>; 'jeffrey.evard@ecocert.com' <jeffrey.evard@ecocert.com>; 'jason.laney@agri.idaho.gov' <jason.laney@agri.idaho.gov>; 'pdescamps@eco-legica.com' <pdescamps@eco-legica.com>; 'au.debonnet@ecocert.com' <au.debonnet@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>
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. You can also contact Bridget with any questions that you have.

Regards,
Cheri Courtney
Director, Accreditation and International Activities Division
Thank you, Lori.

Bridget McElroy
Policy Analyst
USDA National Organic Program
1400 Independence Ave. SW
Room 2646-S. (Stop 0268)
Washington, D.C. 20205

(202) 260-9288

Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards? We do not certify these type of operations

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

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

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

Regards,
Lori Kenyon, Certification Director
NOFA-NY Certified Organic, LLC
840 Upper Front Street- Binghamton, NY 13905
607-724-9851 (Phone) 607-724-9853 (Fax)
Visit our new website: www.nofany.org
The information in this email message and any attachment thereto, are confidential and may contain privileged information intended only for the use of the addressee. If you are not the intended recipient, please notify the sender by return e-mail immediately and delete this message and any attachment from your system. Furthermore, if you are not the intended recipient, you are prohibited from, and it may be unlawful to copy, distribute or disclose this message or attachment or take any action or omit to take action in reliance on it. Neither the sender nor NOFA-NY Certified Organic, LLC, the company to which the sender belongs, accepts any responsibility for any use or misuse of this message or any attachment.

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Thank you, Jenni.

Bridget McElroy

Policy Analyst
USDA National Organic Program
1400 Independence Ave. SW
Room 2646-S. (Stop 0268)
Washington, D.C. 20205

(202) 260-9288

Sent: Tuesday, March 01, 2016 7:32 PM
To: McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>
Cc: Organic <organic@ausmeat.com.au>
Subject: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Good morning Bridget

How are you? Please find following our responses in regards to the email sent by Cheri Courtney.

Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?
*AUS-QUAL has not in the past, or currently has any operators requesting Certification for hydroponic, aeroponic or aquaponic*

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

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

What crops do these certified operations produce (list)?
*N/A*
If you require any further information please do not hesitate to contact us.

Kind regards

**Jenni Flood**  
Admin-Support Officer – Organic Program  
AUS-QUAL Pty Ltd

Ph  07 3361 9219 | Fax  07 3361 9222 | Freecall 1800 630 890  
Unit 1 / 333 Queensport Road North, Murarrie, Qld, 4172 | PO Box 3403, Tingalpa, Qld, 4173.  

Providers of:  
Organic Certification (DOA & NOP), BRC, ISO9001, SQF, Woolworths, Coles, GLOBALG.A.P., Freshcare,  
Codex HACCP, McDonalds SQMS, Costco, Aldi, Spotless Catering and North American Audit services.

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Thank you, Aude.

---

From: BONNET Aude [mailto:aude.bonnet@ecocert.com]  
Sent: Tuesday, March 01, 2016 11:48 AM  
To: McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
Cc: Yang, RobertH - AMS <RobertH.Yang@ams.usda.gov>  
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]  
amule.bonnet@ecocert.com  
www.ecocert.com
Objet : Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

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

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

What do we mean by hydroponic, aquaponic, aeroponic?

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

Examples of systems that fall under this category:
- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

Questions for Certifying Agents:

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

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

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

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

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

Regards,
Cheri Courtney
Director, Accreditation and International Activities Division
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From: Nathalie Boes [mailto:nathalie.boes@certisys.eu]  
Sent: Tuesday, March 01, 2016 10:30 AM  
To: McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>  
Subject: Re: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear,

Certisys does not certify hydroponic or aeroponic operations.

Best regards,

Nathalie BOES  
QUALITY DEPARTMENT

TEL +32(0)81 600 377  |  FAX +32(0)81 600 313
nathalie.boes@certisys.eu  |  www.certisys.eu

I am out of office on Monday afternoon, Wednesday and Friday for urgent matters please contact quality@certisys.eu

Le 1/03/2016 16:11, AMS - AIinbox a écrit :

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

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

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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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, aeroonic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroonic 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. You can also contact Bridget with any questions that you have.

Regards,
Cheri Courtney
Director, Accreditation and International Activities Division

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Thanks, Sam. It shouldn’t take too long. Maybe a week just to give a little time for late submissions.

Bridget

From: Sam Welsch [mailto:sam@onecert.com]
Sent: Thursday, March 03, 2016 6:54 AM
To: McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>
Cc: OneCert Info <info@onecert.com>
Subject: Fwd: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Bridget,

As you are already aware, OneCert does not certify hydroponic, aeroponic or aquaponic operations.

How soon after March 11 do you expect to have a summary of this information available to the hydroponics task force?

Thanks,

Sam Welsch, President
OneCert, Inc.
2219 C Street
Lincoln, NE 68502
402-420-6080
www.onecert.com

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---------- Forwarded message ----------
From: AMS - AIAinbox <AIAinbox@ams.usda.gov>
Date: Tue, Mar 1, 2016 at 9:11 AM
Subject: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems
To: AMS - AIAinbox <AIAinbox@ams.usda.gov>
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>,
This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

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

What do we mean by hydroponic, aquaponic, aeroponic?

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

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- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

Questions for Certifying Agents:

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

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

What crops do these certified operations produce (list)?

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

Regards,

Cheri Courtney

Director, Accreditation and International Activities Division

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Splendid. 😊

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

From: McElroy, Bridget - AMS
Sent: Tuesday, March 01, 2016 10:37 AM
To: Mann, Renee - AMS <Renee.Mann@ams.usda.gov>
Subject: RE: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Thank you! I’ve already received a couple of responses.

Bridget

From: Mann, Renee - AMS
Sent: Tuesday, March 01, 2016 10:35 AM
To: McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>
Subject: FW: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

FYI

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

From: Baron, Anne - AMS
Sent: Tuesday, March 01, 2016 10:29 AM
To: Courtney, Cherri - AMS <Cheri.Courtney@ams.usda.gov>; Crail, Lars - AMS <Lars.Crail@ams.usda.gov>; Gebault King, ReneeA - AMS <ReneeA.GebaultKing@ams.usda.gov>; Lopez, Jason - AMS <JasonLopez@ams.usda.gov>; Lusby, MaryLou - AMS <MaryLou.Lusby@ams.usda.gov>; Mann, Renee - AMS <Renee.Mann@ams.usda.gov>; Yang, RobertH - AMS <RobertH.Yang@ams.usda.gov>; Zuck, Penelope - AMS <Penelope.Zuck@ams.usda.gov>; Adams, Edith - AMS <Edith.Adams@ams.usda.gov>; Caceres, Miguel - AMS <Miguel.Caceres@ams.usda.gov>; Friesenhahn, Martin - AMS <Martin.Friesenhahn@ams.usda.gov>; Gilbert, Corey - AMS <CoreyGilbert@ams.usda.gov>; Heckart, Patricia - AMS <Patricia.Heckart@ams.usda.gov>; Hildreth, David - AMS <David.Hildreth@ams.usda.gov>; Horne, Willy - AMS <Willy.Horne@ams.usda.gov>; Kohles, Alan - AMS <Alan.Kohles@ams.usda.gov>; Lopez, Mike - AMS
Dear AIA staff, NOP Management Team and QAD auditors,

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

Regards,
Alvik Joseph

From: Baron, Anne - AMS On Behalf Of AMS - AIAinbox
Sent: Tuesday, March 01, 2016 10:12 AM
To: AMS - AIAinbox <AIAinbox@ams.usda.gov>
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>; 'amalia.rueda@bioagricert.org' <amalia.rueda@bioagricert.org>; 'admin@bio-inspecta.com' <admin@bio-inspecta.com>; 'central@biolatina.com' <central@biolatina.com>; 'baystateorganic.net' <baystateorganic.net>; 'amalia.rueda@bioagricert.org' <amalia.rueda@bioagricert.org>; 'admin@bio-inspecta.com' <admin@bio-inspecta.com>; 'central@biolatina.com' <central@biolatina.com>; 'baystateorganic.net' <baystateorganic.net>; 'amalia.rueda@bioagricert.org' <amalia.rueda@bioagricert.org>; 'admin@bio-inspecta.com' <admin@bio-inspecta.com>; 'central@biolatina.com' <central@biolatina.com>; 'baystateorganic.net' <baystateorganic.net>; 'amalia.rueda@bioagricert.org' <amalia.rueda@bioagricert.org>; 'admin@bio-inspecta.com' <admin@bio-inspecta.com>; '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>; 'accr audit accreditation@ccof.org' <accr audit accreditation@ccof.org>; 'Bolicert@megalink.com' <Bolicert@megalink.com>; 'ricardo.cozzo@bioagricert.org' <ricardo.cozzo@bioagricert.org>; 'calidad@certimexsc.com' <calidad@certimexsc.com>; 'rporto@caae.es' <rporto@caae.es>; 'Bolicert@bolicert.org' <Bolicert@bolicert.org>; 'tom.nizet@certisyss.eu' <tom.nizet@certisyss.eu>; 'ccoof@ccof.org' <ccoof@ccof.org>; 'rporto@caae.es' <rporto@caae.es>; 'saltmn@clemson.edu' <ccpb@ccpb.it> <ccpb@ccpb.it>; 'Danny.Lee@cdfa.ca.gov' <Danny.Lee@cdfa.ca.gov>; 'mitchell.eryger@state.co.us' <mitchell.eryger@state.co.us>; 'certimex@certimexsc.com' <certimex@certimexsc.com>; 'admin@bio-inspecta.com' <admin@bio-inspecta.com>; 'certimex@certimexsc.com' <certimex@certimexsc.com>; 'ewen@eewen.org' <ewen@eewen.org>; 'jdschootbrugge@controlunion.com' <jdschootbrugge@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@certisyss.eu' <info@certisyss.eu>; 'direccionejecutiva@certimexsc.com' <direccionejecutiva@certimexsc.com>; 'agroecologiaiana@gmail.com' <agroecologiaiana@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'; 'Nathalie.Boes@certisyss.eu' <Nathalie.Boes@certisyss.eu> 

Subject: FW: 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 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. You can also contact Bridget with any questions that you have.

Regards,
Cheri Courtney
Director, Accreditation and International Activities Division
Thank you, Georgana.

**Bridget,**

*We do not currently certify any of these types of operations, but have at least one or two inquiries every year regarding the rule and starting them.*

*Georgana*

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

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Thank you!

---

Julie,

I have our hydroponics answer for you. We still have four:

- Jonathan Sprouts, Inc. – variety of vegetable sprouts
- California Vegetable Specialties – Belgian Endive
- Pear Garden Produce – Mung bean sprouts and Soy bean sprouts
- Jonathan’s Organic – variety of vegetable sprouts

I hope this fulfills your request. Let me know if you need anything else.

Sincerely,
Craig

---

Craig S. Morr
Director, Quality
NSF International
734.769.5143

Quality Assurance International
9191 Towne Centre Drive
Suite 200
San Diego, California 92122
United States of America

NOTICE: This email and its contents/attachments may be confidential and are intended solely for the individual to whom it is addressed. If you are not the named addressee or if this email is otherwise received in error, please immediately notify the sender without reading it and do not take any action based on its contents or otherwise copy or disclose it to anyone. Any opinions or views expressed in this transmission are solely of the author and do not necessarily represent those of NSF International or its affiliates.
Hi Alvik,
Thanks for letting me know. I wasn’t too concerned because that wasn’t a terribly time-sensitive email (some are, but this one wasn’t). If I’m concerned in the future, I’ll give you a call. Thanks.

Renee

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

Hi Renee,

My apologies regarding not sending the message earlier, I was a bit occupied with another task in addition to connectivity issues I had when I finally got to it.

Please let me know if anything, also please do not hesitate to ping me at 571-353-5919 if I don't respond in a reasonable time.

Regards,
Alvik

Hello Alvik:
I forgot to add that I would like you to send this to the public, primary, and secondary contact persons for each of the 80 accredited certifiers and the California state organic program.

Thanks,
Hi Alvik:
Please send the following email to the 80 accredited certifiers (do not send to recognized, suspended, expired, etc. – only “accredited”). Also, copy the following people on the message (Anne has a list):

1. NOP management
2. AIA staff
3. QAD auditors
4. California SOP

Thank you,
Renee

Subject: Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

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

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

What do we mean by hydroponic, aquaponic, aeroponic?

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

- Deep flow/raft
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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. You can also contact Bridget with any questions that you have.

Regards,
Cheri Courtney
Director, Accreditation and International Activities Division

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Thank you, Ing. Figueiras!

From: ARGENCERT - Ing. Arg. Marina Figueiras [mailto:mfigueiras@argencert.com.ar]
Sent: Wednesday, March 16, 2016 5:23 PM
To: McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>; Laura Montenegro <lmontenegro@argencert.com.ar>
Subject: Re: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear Bridget,

ARGENCERT does not certify hydroponic, aeroponic or aquaponic operations at the moment.

Best regards,

Ing. Agr. Marina Figueiras
Gerente de Calidad/Quality Manager
ARGENCERT S.A.
+54 11 4363 0033
mfigueiras@argencert.com.ar
www.argencert.com.ar

El 16/03/2016 a las 04:30 p.m., AMS - AlAinbox escribió:

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

Dear Certifiers:

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

Regards,
Cheri Courtney
Director, Accreditation and International Activities Division

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

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

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- 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 aquaponic 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. You can also contact Bridget with any questions that you have.

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From: Mann, Renee - AMS
Sent: Wednesday, March 16, 2016 3:45 PM
To: McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov>
Subject: FW: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Hi Bridget,
This message just went out. FYI. I hope you get some more responses!
-RM

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

From: Baron , Anne - AMS
Sent: Wednesday, March 16, 2016 3:32 PM
To: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>; Crail, Lars - AMS <Lars.Crail@ams.usda.gov>; Gebault King, Reneea - AMS <ReneeA.GebaultKing@ams.usda.gov>; Lopez, JasonJ - AMS <JasonJ.Lopez@ams.usda.gov>; Mann, Renee - AMS <Renee.Mann@ams.usda.gov>; Yang, RobertH - AMS <RobertH.Yang@ams.usda.gov>; Zuck, Penelope - AMS <Penelope.Zuck@ams.usda.gov>; Adams, Edith - AMS <Edith.Adams@ams.usda.gov>; Caceres, Miguel - AMS <Miguel.Caceres@ams.usda.gov>; Friesenhahn, Martin - AMS <Martin.Friesenhahn@ams.usda.gov>; Gilbert, Corey - AMS <Corey.Gilbert@ams.usda.gov>; Heckart, Patricia - AMS <Patricia.Heckart@ams.usda.gov>; Hildreth, David - AMS <David.Hildreth@ams.usda.gov>; Horne, Willy - AMS <Willy.Horne@ams.usda.gov>; Kohles, Alan - AMS <Alan.Kohles@ams.usda.gov>; Lopez, Mike - AMS <Mike.Lopez@ams.usda.gov>; Matejovsky, Kathryn - AMS <Kathryn.Matejovsky@ams.usda.gov>; Ross, Steve - AMS <Steve.Ross@ams.usda.gov>; Schoop, Jamie - AMS <Jamie.Schoop@ams.usda.gov>; Skinner, Rick - AMS <Rick.Skinner@ams.usda.gov>; Wilson, Darrell - AMS <Darrell.Wilson@ams.usda.gov>; Gebel, Kelley - AMS <Kelley.Gebel@ams.usda.gov>; McEvoy, Miles - AMS <Miles.Mcevoy@ams.usda.gov>; Tucker, Jennifer - AMS <Jennifer.Tucker@ams.usda.gov>; Nelson, Kristen - AMS <Kristen.Nelson@ams.usda.gov>; Lewis, Paul I - AMS <Paul.Lewis@ams.usda.gov>; Holmes, Vella - AMS <Vella.Holmes@ams.usda.gov>; Michael, Matthew - AMS <Matthew.Michael@ams.usda.gov>; andy@oeffa.org
Subject: FW: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Dear AIA staff, NOP Management Team and QAD auditors,

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

Regards,
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 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?

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Examples of systems that fall under this category:
- Deep flow/raft
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- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

Questions for Certifying Agents:

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

If you certify hydroponic, aeroponic or aquaponic 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. You can also contact Bridget with any questions that you have.
You are welcome!!

Happy Easter

Kindly

---

Dear Ms Bridget

According your request (received through Ms. Anne Baron) we do not certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards

Best regards
De: Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] En nombre de AMS - AlAinbox
Enviado el: miércoles, 16 de marzo de 2016 04:30 p.m.
Para: AMS - AlAinbox
Asunto: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

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

Dear Certifiers:

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Regards,
Cheri Courtney
Director, Accreditation and International Activities Division

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What crops do these certified operations produce (list)?

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

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Schurkamp, Lynnea - AMS

From: McElroy, Bridget - AMS
Sent: Monday, May 23, 2016 2:59 PM
To: Amy Lamendella
Subject: RE: Request for information about hydroponic (etc) production

oK thanks Amy!

From: Amy Lamendella [mailto:amy@ccof.org]
Sent: Monday, May 23, 2016 2:40 PM
To: McElroy, Bridget - AMS
Subject: Re: Request for information about hydroponic (etc) production

Hi Bridget,

Yes, I am confident that the 39 operations reported do not include seedlings, as we haven’t tracked greenhouse or transplant production in the same way as container crop production.

I haven been able to read Sams comments but look forward to doing so. I realize that my report was going to need reworking.

Also wanted to let you know that I will be on the calls today, but an home with the flu and my home computer died so o don’t have access to the reports.

I’m going to do my best to participate today under non -ideal circumstances.

Amy

Sent from my iPhone

On May 23, 2016, at 8:58 AM, McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov> wrote:

Hi Amy,

Just reading Sam’s comments on your draft and looking back at the results of the survey we did to certifiers. I realize now that the language in the survey did not differentiate between seedling production and crops grown to harvest. However most certifiers specified this in their responses to me. On the container question I think we can be pretty sure that a majority of the 69 container based operations reported are for crops for harvest. That is assuming the 39 that you report below are not seedling operations. Other certifiers that reported certifying container based operations listed things like blueberries, raspberries, tomatoes and peppers in Mexico, lettuce—all things that seem more like crops for harvest, rather than seedlings.

Are any of the 39 operations below doing just seedlings? Do you have this information?

Thank you so much for your work on the container production draft!! It looks great so far. Will finish reading now.
Good afternoon Bridget,
We received your request, and I have CCOF results for you. Please note that this is our best guess, that the systems we use to track these types of operations are not full proof. However it will give you a good indication.

Additionally, we do not track the different systems to the level of detail that the NOP requested, so I’ve separated the systems into Hydroponic, Aquaponic and container.

As you will see, we have very few hydroponic and aquaponics. Container systems (depending on how you define this) are far and away the most common type of certification within this spectrum.

As of March 1, 2016, CCOF has the following members:

A. **Hydroponic – 4 total (3 certified and 1 in process)**
   - 3 in CA and 1 in NM
   - Types of systems: Raft, sand/gravel bed and NFT systems
   - CROPS - Lettuce, herbs

B. **Aquaponic - 3 total**
   - CA, TX and OK
   - Types of systems: Raft and media based
   - CROPS - Water plants, vegetables, herbs and microgreens, lettuce

C. **Container - 39 total**
   - 13 in MX, 26 in USA
   - For US operations:
     - AZ = 1
     - CA = 18
     - CO = 5
     - MI = 1
     - NM = 1
   - Types of systems: Dutch bucket/Upright bag, slab, pots (most common)
   - CROPS* = Berries (15), cucumber (3), herbs(1), lettuce (1) other mixed vegetables(3), peppers (2) tomatoes (15)
   - *Note some operations grow multiple different crops

Amy Lamendella
Director of Farm Programs Certification
CCOF
2155 Delaware Ave, Suite 150
Santa Cruz, CA 95060
Phone 831-423-2263 ext 6215
(831) 346-6215
Fax 831-423-4528
www.ccof.org
Support the California Organic Food and Farming Act! Contact your legislator to voice support for California's organic farmers by passing the California Organic Food and Farming Act. Read more about the legislation and how you can get involved »

Apoye la Ley de Alimentos y Agricultura Orgánica de California! Contacte su legislador para expresar su apoyo en pasar la Ley de Alimentos y Agricultura Orgánica de California para los agricultores orgánicos de California. Lea más sobre la legislación y como puede participar »

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Dear Mr. Yang,

Thank you indeed. I think two my previous messages to you with the same request have not been received by you. This is the only reason of me seeking for somebody in NOP to respond. I hope you understand me.

I understand your response. Products are plant origin for India. Now remaining question is whether they will be accepted in India as USDA NOP organic if exported not from USA but from Russia to India directly. Please let me know.

Best regards,
Ms. Nune Darbinyan

Die Grüße, Frau Nune Darbinyan

Dr. Nune Darbinyan
General Director
ECOGLOBE

Contact information:
Tel: +37410221295
Tel mob: +37410221295
Fax: +37410221295
E-mail: nd@ecoglobe.am
Internet: www.ecoglobe.am

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

Mind about environment before printing!

Hello Dr. Darbinyan:

Your email has been forwarded to me for response.

OFPA and USDA organic regulations do not specifically prohibit aquaponics production. Accordingly, certification of such production under the USDA organic is currently allowed.
With regard to your question regarding export of products certified under the USDA organic regulations from Russia to India, it is not clear from your email what types of products you are referring to. However, please be advised that the US – India Recognition Agreement (i.e. trade arrangement) does not cover livestock products.

I hope this helps. Let me know if you need additional clarification.

Regards,

Robert Yang
Acting Assistant Director
Accreditation & International Activities Division
USDA National Organic Program
Office: (202) 690-4540

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
(b) (6) mobile

-----Original Message-----
From: Nune Darbinyan <nune.darbinyan@yahoo.com>
Sent: Friday, May 13, 2016 10:56 PM
To: Crail, Lars - AMS <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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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:     +37410221295
Fax:         +37410221295
E-mail: nd@ecoglobe.am
Internet: www.ecoglobe.am

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

Mind about environment before printing!

Hi Nune,

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

Best Regards,

Lars Crail
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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Hello Dr. Darbinyan:

Under the US – India Recognition Agreement, organic handling operations in India certified under the USDA organic regulations may use imported certified USDA organic ingredients to produce a certified USDA organic, multi-ingredient product to be exported to the US.

Regards,

Robert Yang
Acting Assistant Director
Accreditation & International Activities Division
USDA National Organic Program
Office: (202) 690-4540

Dear Mr. Yang,

Thank you indeed. I think two my previous messages to you with the same request have not been received by you. This is the only reason of me seeking for somebody in NOP to respond. I hope you understand me.

I understand your response. Products are plant origin for India. Now remaining question is whether they will be accepted in India as USDA NOP organic if exported not from USA but from Russia to India directly. Please let me know.

Best regards, Ms. Nune Darbinyan

Liebe Grüße, Frau Nune Darbinyan

Dr. Nune Darbinyan
General Director
ECOGLOBE

Contact information:
Tel: +37410221295
Hello Dr. Darbinyan:

Your email has been forwarded to me for response.

OFPA and USDA organic regulations do not specifically prohibit aquaponics production. Accordingly, certification of such production under the USDA organic is currently allowed.

With regard to your question regarding export of products certified under the USDA organic regulations from Russia to India, it is not clear from your email what types of products you are referring to. However, please be advised that the US – India Recognition Agreement (i.e. trade arrangement) does not cover livestock products.

I hope this helps. Let me know if you need additional clarification.

Regards,

Robert Yang
Acting Assistant Director
Accreditation & International Activities Division
USDA National Organic Program
Office: (202) 690-4540

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  
(b) (6) mobile

-----Original Message-----
From: Nune Darbinyan [mailto: @yahoo.com]
Sent: Friday, May 13, 2016 10:56 PM
To: Crail, Lars - AMS <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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My understanding was that Miles was photographed at and blogged about an organic hydroponic operation that was featured on the USDA homepage as part of our veteran-supporting efforts.

FYI, there are some surveys ACAs regarding numbers of hydroponic operations at N:\AIA\Projects\Hydroponics.

Betsy Rakola

Agricultural Marketing Specialist, USDA-AMS National Organic Program
Tel 202-690-1312
Fax 202-205-7808
www.ams.usda.gov/NOP

Hello AIA,
Does anybody know if we have published anything that clarifies whether hydroponic operations can or cannot be certified? This could be an instruction, guidance, training, newsletter article, etc.

Thank you,
Renee

Ms. Renee Mann
Agricultural Marketing Specialist
USDA National Organic Program
+1 (202) 205-5213
[NOP website](http://www.ams.usda.gov/NOP)
Sign up for the NOP Organic Insider, NOP's newsletter.
NDA has an inquiry regarding certification of hydroponic and/or aquaponic production systems to USDA NOP standards, and I've included both our new and old accreditation managers on this email just in case. NDA is familiar with the NOSB recommendation stating that hydroponic operations are not eligible for certification to USDA NOP standards. Additionally, Miles McEvoy confirmed that USDA NOP agreed with this recommendation when speaking publicly at a Nevada Organic Advisory Council workshop in Las Vegas a few years back. However, no formal action has been taken on the recommendation and it is clear that a number of accredited-certifiers are in fact granting certification to hydroponic and aquaponic operations. Given the NOSB recommendation and Miles' personal backing of that recommendation, NDA has turned away a good number of potential clients. Other accredited-certifiers who work in our State are certifying these operations, apparently based on non-official feedback from Miles/NOP, creating what we feel is an unfair certification/business environment. NDA would like to request clarification from USDA NOP regarding the eligibility of hydroponic and aquaponic production systems to receive certification to USDA NOP standards. Please let us know if additional information is needed. We look forward to your response.

Cheers

Steve Marty
Agriculturist IV
Nevada Department of Agriculture
405 South 21st Street
Sparks NV 89431
775-353-3773

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Will do.

Hold off until we can discuss later this week

Miles V McEvoy
Deputy Administrator
USDA National Organic Program

On Mar 28, 2016, at 8:35 AM, McElroy, Bridget - AMS <Bridget.McElroy@ams.usda.gov> wrote:

Hi Miles,

Can I share the general results from the hydroponics survey with the task force? A few of them have asked about it. By general results, I’m thinking of the items below as we shared in last week’s brown bag.

Status of Certification:
- Survey of 80 certifiers, 59 responded.
  - **DO** certify hydro/aquaponics: 18
  - **DO NOT** certify hydro/aquaponics: 41
  - Total **hydroponic** operations certified: 65
  - Total **aquaponic** operations certified: 22
  - Total **container** operations certified: 39
  - Types of crops: herbs, various greens, mixed vegetables (tomatoes, peppers, cucumbers, etc.), various berries, flowers, etc.
  - Geographic location of operations:
    - CA, Mexico, AZ, NM, TX, CO, MI, the Netherlands, OR, HI, WA, MO, LA, KS, ME, PA, GA, NY, NJ, OH, NC, FL, AK, VA
Good morning Bridget,

I was wondering how the response rate was to the survey done a few weeks ago of certifiers? And of course, are there results to share?

Eric

--
Eric Sideman
Crop Specialist
Maine Organic Farmers and Gardeners Association
Phone: 603 269 6201
esideman@mofga.org
From: McElroy, Bridget - AMS
Sent: Monday, March 14, 2016 8:53 AM
To: Jeanne Gonzales
Subject: Read: GEORGIA CROP IMPROVEMENT ASSOCIATION RE: HYDROPONICS, AQUAPONICS, ETC.
Attachments: Read: GEORGIA CROP IMPROVEMENT ASSOCIATION RE: HYDROPONICS, AQUAPONICS, ETC. .msg

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