

October, 17 2023

Fall NOSB Oral Comments

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

I am here to report on what Cornucopia is hearing from organic consumers on important policy issues.

First and foremost: consumers are worried and confused by the lack of consistency in the organic marketplace. This lack of consistency leads to consumers questioning organic integrity.

The specific areas this arises most often include the livestock animal standards and hydroponics. We hope that the Organic Livestock and Production Standards [OLPS] will be finalized and enacted soon, curing a lot of the consumer confusion and a lack of consistency in organic livestock products including eggs, poultry, and dairy.

Many consumers see a distinct lack of consistency in organics because hydroponic production is allowed. The more educated a consumer is about the issues, the more concern they have for hydroponics in general. The chief complaint we hear is that they understand organic produce is soil-grown. When they hear that “organic hydroponic” exists and is growing in the marketplace it calls into question their trust of the entire label. (Hydroponic being defined as anything grown to harvest without soil, where any inert medium does not count as soil.)

Cornucopia understands these consumer concerns from a policy perspective: organic hydroponics exists in a regulatory vacuum. From the legal standpoint this is a precarious position to be in when the market relies on market distinction and transparency to exist.

The NOSB has worked hard to make multiple recommendations concerning greenhouse and container production over the years. This NOSB work was enriched by many years of deliberations, discussions, and the efforts of public commentators. The NOP has thus far not enacted any of those recommendations.

Consumers trust the organic label. They pay extra for the assurance that it provides a more healthful and environmentally friendly way of producing the food they feed their families. They also choose organic food because it provides more benefits to communities, including through ecosystem services. Despite the USDA’s policy that the organic label is just a “marketing term”, the organic community and its dedicated consumers know better. Research continues to back up the environmental and health benefits of organic food.

Hydroponics turns that assumption of environmental and benefits on its head, which is one reason consumers in the know are so concerned.

Cornucopia does not believe this issue is settled. As it stands the standards are **not consistent**, and maintaining consistencies is one of the main edicts of OFPA. We urge the NOSB, NOP, and

other stakeholders to review the **Organic Agriculture is Soil-Based Position Statement**, which lays out the issues meticulously.

To expand the organic marketplace, we need to improve integrity and transparency throughout the agricultural system. The whole organic system must commit to **continuous improvement**. We need the organic label to stand for true conservation agriculture, as an example for how all farming should be.