

I'm here today to voice my opinion on what will become of a production system as old as human agriculture, yet with its modern roots in post-World War Two society that quickly became concerned with the dangerous side effects of chemical agriculture. This system was called 'organic' as a nod to the fact that a well-balanced ecosystem needs to be viewed as a living organism. And this system can be summed up in one word: soil.

The OFPA, on which the NOP is based, clearly got this right when soil fertility was the benchmark for being a certified organic farm. It seems there are two sides to this issue. On the one side are those that say hydroponics (this does include container grown crops that get the majority of their nutrients from soluble fertilizers) should be able to be certified organic as long as all inputs are allowed under the national law, that their systems contain biology without soil, that they represent new technologies and innovations for producing food. They maintain that allowing hydroponically produced foods the same organic status as soil grown foods is progress.

One of their chief arguments is that the marketplace needs more organic food. They are expanding quickly because the U.S. organic market for produce is lucrative. Growing hydroponically with allowable organic inputs is much easier than growing organically in the soil. On the other side are those that maintain that OFPA got it right when it made soil the centerpiece of being a certified organic farm.

And my question is how, in a short 27 years, could something so essential, in fact that which is the whole point to the production system, become something old fashioned, something that needs to step aside for progress, something that needs to make way for innovation. No, my friends, innovation was realizing that a truly healthy sustainable farming system that could call itself organic had to, without compromise, be centered around the soil as a living entity. That is innovation, that is progress, and, as a farmer looking at his 30th year of being certified organic in 2018, I can tell you we have just barely scratched the surface of what all this means because the complexity is so great.

To allow a much less complex production system to wear a highly coveted and extremely hard-earned seal as certified organic, that to me is not progress. That is capitulating to market forces. When one of your main arguments is to allow a system that is not compatible with the OFPA to wear the same seal as a system that is because the market needs more organics to sell seems like watering down the wine because we might run out. It's not what you do to a production system that is not easy to emulate and thus well respected around the world.

Hydroponic farming is missing the most essential ingredient there is to organic farming, soil, and you can't have organic farming without soil. Organic farming is not about allowable inputs, it's about feeding the soil not the plant. Hydroponics is the opposite of this. My vote is for the integrity of the production system, not for the betterment of commercial interests, and I hope yours will be too.