



October 11, 2017

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2642-So., Ag Stop 0268  
Washington, DC 20250-0268

**Docket:** AMS-NOP-17-0024

**RE: Crops Subcommittee – Field and Greenhouse Container Production (Discussion Document)**

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Crops Subcommittee’s Discussion Document on Field and Greenhouse Production.

The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing over 9,500 organic businesses across 50 states. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

### **Summary**

The Organic Trade Association has always supported the development of strict and appropriate production standards for container production that align with organic production principles. These standards should address production concerns specific to container production both in greenhouses and in the open field. We appreciate the opportunity to provide feedback on the three areas brought forward in this discussion document (artificial lighting, synthetic mulches, and reuse of containers and media). However, we urge the Crops Subcommittee (CS) to ensure that future recommendations focus on practices that are unique to container production and avoid developing a double standard for practices used in both container and soil-based production. These three areas of concern do play a role in evaluating container production systems. However, they could also apply to producers growing in the soil.

### **Artificial Light**

CS asks for feedback on whether the amount of artificial light should be limited and whether there should be requirements for the type (e.g. full spectrum, UV, etc.) of light used in organic container production. It is important that standards be flexible enough to accommodate differing natural photoperiods based on latitude or season. Limiting the amount of artificial light may make sense in certain circumstances, should its use compromise organic principles. However, CS has not brought forward situations where this may be the case. We urge caution in developing prescriptive requirements without a specific outcome in mind. In the case of poultry production, limiting the use of artificial light makes sense, as prolonged photoperiods for egg-laying chickens to stimulate production can cause stress and can create an animal welfare concern. OTA supports the limits on artificial light included in the final Organic Livestock and

Poultry Practices regulation, but we would want additional justification on how limitations on artificial light aligns with organic crop production principles before moving forward with a recommendation on this issue.

Organic stakeholders have pointed to the energy usage involved with artificial lighting as justification for limiting its use. However, if NOSB wishes to look at energy efficiency within organic systems, we would encourage not singling out a single factor (artificial lighting), but rather look at these systems as a whole and develop recommendations that could address energy efficiency across the entire supply chain: artificial lighting, fuel for tractors and distribution, refrigeration, fertilizer manufacturing, etc.

Lastly, since artificial lighting could be used by both container and soil-based producers, we encourage the development of future recommendations to cover all organic crop producers, not only those who grow in containers.

### **Synthetic Mulches**

In this discussion document, CS raises some serious concerns related to the use of durable synthetic mulches that remain in the field for multiple seasons. Water infiltration, soil sterilization, the potential for run-off and erosion, and the potential for reductions in biodiversity are all valid concerns that warrant consideration by CS in developing recommendations. However, the use of synthetic mulches is not unique to container production, and we encourage CS to develop recommendations that ensure the proper use of synthetic mulches on all organic production systems. Synthetic mulches are an important weed control tool for organic producers, but the use of these materials should not come at the expense of other organic production values like biodiversity, soil conservation, and pest and disease management. Developing additional guidelines governing the use of synthetic mulches is warranted, and these guidelines should apply whenever synthetic mulches are used, not just in container production systems.

### **Disposal of Crops and Containers**

OTA has supported comprehensive guidelines for container production since NOSB passed its 2010 recommendation on Production Standards for Terrestrial Plants in Containers and Enclosures. This recommendation stressed that growing media should be recycled and shall not be disposed of as waste. OTA supported this aspect of that recommendation, and we support the CS minority view that has added the requirement that containers be reused or recycled at the end of the crop's life. We believe the reuse and recycling of media and containers align with organic production practices and should be a requirement for organic producers who grow crops in containers as well as for soil-based growers who may grow transplants in containers prior to planting in the soil.

### **Conclusion**

The Organic Trade Association supports CS's ongoing effort to develop recommendations for standards that will ensure organic container producers align with organic production principles. The three issues raised in this discussion document warrant further consideration by CS in developing future recommendations. We also encourage CS, as it continues its work on development of comprehensive regulations for container production, to consider developing recommendations on the following additional areas:


- Biodiversity – soil, plants, insects, and animals
- Water Management
- Excess Plant Nutrient Management

- Crop Rotation

Furthermore, as CS evaluates each of these areas, we urge caution in developing recommendations that would only apply to container producers for practices employed by both container and soil-based producers

On behalf of our members across the supply chain and the country, the Organic Trade Association thanks the National Organic Standards Board for the opportunity to comment, and for your commitment to furthering organic agriculture.

Respectfully submitted,



Nathaniel Lewis  
Farm Policy Director  
Organic Trade Association

cc: Laura Batcha  
Executive Director/CEO  
Organic Trade Association