

My name is Angela Schriver from Schriver Organics.

Yesterday I heard a lot of talk on what would be the "strongest and fastest way to drive organic demand," and that demand has possibly become stagnant.

I don't know what would increase demand for organic products, but I do know what would hurt demand, and that would be a tiered-label approach of:

- organic
- kind-of-sort-of organic
- not really organic, but we didn't want to be exclusionary

—all this in an effort to include hydroponics under the USDA organic label.

One of the things we think of when we hear organic is nutrient-dense food.

Why? What creates nutrient-density?

Googling the phrase "soil health and nutrient density" you find:

Soil Health & Nutrient Density from the National Institute of Health whose findings suggest soil health is an "under-appreciated influence on nutrient density."

You also find: *Nutrient Density: Know the Facts* from Rodale, that states:

plants get their nutrients from the soil and "healthy nutritious food starts with healthy soil."

The common thread being soil, specifically healthy soil.

The comparisons were always between "regenerative farms" specifically that used cover cropping and diverse crop rotations and "conventional farms" that used synthetic fertilizer and herbicides.

Discussing whether regenerative is a step towards organic is not my discussion point, but obviously in these cases, the cover cropping and diverse crop rotations are a substantial component of an organic system.

Instead, I want to focus on conventional ag.

The premise of conventional ag is inserting fertilizer into a growing medium in order to produce a crop, providing most, if not all, the nutrients a crop needs to grow.

Sounds like hydroponics to me. Not using synthetic fertilizer does not make you organic.

The beauty of a healthy soil system is the diverse microbial life that is acquired through biodiversity.

I don't think discussing the delivery system of nutrients in hydroponics will be able to address the lack of microbial life that is inherently present in a healthy soil system that is the hallmark of organic.

It is that specific healthy soil system that the NOP establishes by requiring crop rotations among the other pillars of soil health.

And going through the typical process of rulemaking will not make hydroponics organic.

Additionally, **organic production that is soil-based, incorporates diversity, and protects the environment is exactly why organic is climate-smart.**

And to utilize true organic agriculture systems to fight climate change should be met with immediate action.

If you don't immediately resolve the discrepancy between true organic systems and hydroponics, you will lose the opportunity to say organic is climate-smart. And missing that opportunity would leave the term "climate-smart" **accessible for conventional farming to hijack.**

There is no "getting creative" in how we look at hydroponics, as it will never align with organic.

I think the NOSB needs to put a hold on certifying hydroponics until you decide if the NOSB wants to advance what we call "organic" or if you want to truly advance organic policy.

Because they are not the same thing.

Thank you.