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April 15, 2009

Chief Standards Development and Review Branch  
National Organic Program  
Transportation and Marketing Programs  
USDA-AMS-TMP-NOP  
1400 Independence Avenue, SW  
Room 4008 South, Ag Stop 0268  
Washington, DC 20250

Re: Docket Number AMS-NOP-10-0021: Production Standards for Terrestrial Plants in Containers and Enclosures (Greenhouses)

Oregon Tilth Certified Organic (OTCO) is a nonprofit research and education membership organization dedicated to biologically sound and socially equitable agriculture. Oregon Tilth offers educational events throughout the state of Oregon and provides organic certification services to organic growers, processors, and handlers internationally.

An NOP accredited certifier since 2002, OTCO currently certifies 740 farms and ranches in over 35 states, affording us a broad perspective of current practices and challenges faced by organic producers, as well as the effect that the anticipated successes and challenges this discussion topic will have upon them.

**Greenhouse Production Standards:**

OTCO has reviewed the proposed standards for greenhouse production. Oregon Tilth Certified Organic supports the Crops Committee recommendation for Production Standards for Terrestrial Plants in Containers and Enclosures.

We concur with and applaud the position, expressed in the discussion section, of the importance of soil organic matter; that “this is the central theme and foundation of organic farming,” supporting, as the committee so aptly highlights, “an amazing and diverse ecology” that is “the foundation of the success of organic farming.”

We further support the adoption a definition of hydroponics and aeroponics, similar to recent additions by the NOP’s international counterparts. Definitions will help eliminate confusion about production systems and be clear as to the differences between hydroponic, aeroponic, greenhouses, hoop houses, plastic-lined trenches filled with compost, etc.



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We feel that these changes to the rule are necessary, provide clarity to the industry and harmonize with international standards, thereby preventing compliance issues for ACAs, growers, or materials suppliers across borders.

Thank you for the dedication and hard work you demonstrate by putting these actions and recommendations forward. Oregon Tilth looks forward to being involved in future discussions and process.