



470 Lancaster Drive NE | Salem, OR 97301 | www.tilth.org | PH 503.378.0690 | FX 503.378.0809 | organic@tilth.org

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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-TM-09-0014 : Soil-less growing systems

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 660 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.

OTCO has reviewed the discussion document regarding soil-less growing systems. Oregon Tilth is supportive of production systems that strive to be sustainable and organically certified. If Producers can adapt to their production systems to comply with the regulation requirements, we feel they should be encouraged to do so and obtain certification.

Oregon Tilth encourages the continued discussion that will provide regulatory language and guidance for production systems that have become controversial due to the fact that they are not specifically addressed in the current regulation. Examples of those systems would be fungi production, yeast production, apiculture, soil-less growing systems (hydroponic, aquaponic, etc), aquaculture, etc. Further discussion should offer guidance or regulation that clearly defines how these production systems can become sustainable in practice and obtain organic certification, in order to encourage those types of organic products to be available to consumers.