

PUBLIC SUBMISSION

As of: January 23, 2024 Tracking No. lqp-dr8r-rtro Comments Due: January 22, 2024
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Docket: [AMS-NOP-23-0052](#)

National Organic Program: Notice of Intent to Extend and Revise a Previously Approved Information Collection (2024)

Comment On: [AMS-NOP-23-0052-0001](#)

National Organic Program: Notice of Intent to Extend and Revise a Previously Approved Information Collection (2024)

Document: [AMS-NOP-23-0052-0004](#)

Comment from Downey, Teresa

Submitter Information

Name: Teresa Downey

General Comment

I am a certified organic producer. I follow all the regulations set forth in the USDA organic standards. I MUST meet these regulations to maintain my certification at great cost to my farm. I go beyond many of these regulations because it is the right thing to do for our planet and humanity.

USDA this year came out with the Strengthening Organic Enforcement Ruling, that all MUST follow to maintain that they are following regulations to meet that certification. This rule is to assure that fraud is not part of the organic production, processing and handling in the US. These are all good things.

Then, why are clearly soilless producers who DO NOT meet the USDA Organic standards regulation allowed to carry the USDA Seal? They DO NOT meet these USDA Organic standards. Period!

These organizations that uphold these standards; USDA, NOP and ACA's that are supposed to be responsible for upholding these long-strived for regulations are the cause of major fraud. I think some internal reflection of fraud and where it stems would go a long way in making the USDA Seal a reputable seal that farmers and consumers can be confident in.

I work hard to maintain and use this seal, but I am being stabbed in the back by the very system that created it.

I am not against this type of soilless production, as we need to produce food. I am against dishonesty, and this is incredibly dishonest for a production system that clearly does NOT meet the regulations to get to carry this seal, while I strive with hard work, sweat and financial burdens to maintain my seal within the current regulations. Do you realize what is being caused by this irresponsible dishonest allowance?

Please hold yourselves and your ACA's accountable for their actions and stop the fraud at the source. Some inward reflection is needed before any outward growth and support can allow organics to flourish. Be a solution, not part of the problem.

Collect ALL the data and start using it for the betterment of this program, by building trust and growing a program that can benefit all, not deceive them.