

# PUBLIC SUBMISSION

<b>As of:</b> January 23, 2024 <b>Tracking No.</b> lrp-as8e-d790 <b>Comments Due:</b> 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-23-0052-1481](#)

Comment from Dinerstein, Paula

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## Submitter Information

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## General Comment

A central focus of the Organic Foods Production Act (OFPA) is fostering soil fertility and boosting the organic content of the soil. This is necessary to meet the goals of the act and achieve its potential to use natural methods of farming, sequester carbon, build soil health, promote biodiversity and promote ecological balance. Hydroponic and other soilless crop production does none of those things ,completely undermines OFPA, and cannot be approved as organic production.

Currently "organic" productions produced with soilless production systems are not labeled or even reported to the National Organic Program (NOP) so that the neither the NOP nor the public has a handle on how much of supposedly organic production really is not. At the least the NOP should collect that .data from certifiers and make it public.

Thank you.

Sincerely,

Ms. Paula Dinerstein

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