

PUBLIC SUBMISSION

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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](#)

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Document: [AMS-NOP-23-0052-1056](#)

Comment from Gover, Gary

Submitter Information

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General Comment

The health of our planet and our reliance on organic products call for a closer look at how the Organic Foods Production Act (OFPA) is implemented. While USDA's National Organic Program (NOP) certifies both soil-based and soilless crop producers, these systems have vastly different environmental impacts. Soil-based systems contribute to a healthier planet through carbon sequestration, soil health improvement, and water conservation, while soilless systems lack these benefits. Yet, both receive the same "organic" label and USDA Organic seal, leaving consumers and international trade partners in the dark about the true origin and impact of their purchases.

The core of the issue lies in OFPA's specific mandate for organic plans to foster soil fertility (6513(b)(1)). NOP's current approach, however, allows the accreditation of certifying agents for both soil-based and soilless producers, despite the clear inconsistency of soilless systems with the soil fertility requirement. This inconsistency undermines the integrity of the "organic" label and hinders informed consumer choices and fair trade practices.

To assure the consistent standard and environmental integrity of organic products, NOP needs to take critical steps:

Collect data: Gather information on the type of production system used by certified crop producers, enabling a clear distinction between soil-based and soilless products in the market.

Refine certification: Strengthen certification practices by requiring accredited agents to assess compliance with OFPA's soil fertility requirement for all crop operations.

Increase transparency: Mandate that certifying agents for soilless operations provide and publicly disclose detailed data on their producers, including acreage, yield, crop types, value, brands, origin, and market destinations.

Importance:

Addressing this issue is crucial not only for consumer trust and environmental protection but also for U.S. compliance with international organic trade agreements. The unique situation of soilless production being certified as "organic" in the U.S. alone necessitates data collection for market transparency and ensuring fair trade practices.

By implementing these data collection and transparency measures, NOP can safeguard the integrity of the "organic" label, empower consumers, and fulfill its mission to promote sustainable organic production that truly benefits both our planet and our health.

Sincerely,

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