

**Letters written by Dave Chapman as part of his campaign against organically certified hydroponic crop production.**

**Hi All,**

When we started writing petitions three years ago, we thought that it would be a simple thing to bring attention to the ongoing organic certification of hydroponics. We thought that once everybody heard about it, the loophole would be quickly fixed. Surely it was an oversight that allowed hydroponic production into organic certification. Changing this has turned out to be a bigger challenge than we thought. For one thing, there was much more money involved than we realized. Hydroponic organic sales in the US this year will probably exceed \$200,000,000. Over half of those sales are coming from just two businesses. And as one large hydroponic grower who is an old friend said to me, "Dave, It is going to be BIG, and it is coming fast." The picture above shows hydroponic blueberries produced in California. The organic market is currently being transformed by these enormous greenhouses from around the world pushing hydroponic tomatoes, lettuce, peppers, and berries into the North American stores. And no one can tell what they are buying! Even the people who work in the stores have no idea what they are selling. If we don't stop this, the organic label will stand for something quite different from what it is meant to be. Between hydroponics and animal welfare, we will have lost organic as a word describing our way of farming.

In the last three years, many people have spoken out. Thousands of farmers and eaters have signed [three different petitions](#). [Forty organizations and many organic leaders signed](#) the [letter calling for a moratorium](#) on all new hydro certification. This was a powerful demonstration of the depth of support for keeping organic farming in the ground. Senator Patrick Leahy, the original co-sponsor of the Organic Food Production Act that defined USDA involvement with organic also wrote a [letter to Secretary Vilsack](#) calling for a moratorium.

After that letter became public, the hydroponic growers formed a well-funded lobbying group. So you will start to see more articles and opinion pieces defending hydro. They finally realized that they might lose this fight.

The USDA responded by forming a task force to study the issue, and after many delays by the hydroponic supporters, the National Organic Standards Board has finally received the [task force report](#) (all 196 pages of it!). Now the NOSB is once again debating the issue, and we are once again waiting for their recommendation six years later.

The NOSB needs our help. They need to hear from us about the issue. They are asking for public comments by October 26, before the fall meeting. Your comments really do matter. They will be read. Believe me that the hydro lobbying group will ensure there are a lot of comments supporting their industry.

When you signed the petitions, over a thousand of you included a written comment. Please take a minute or two to do that again. This time those comments will be read by the 15 members of the NOSB. They will be permanently posted as a record of your beliefs. Many of the NOSB really don't

know much about this issue, so it is very important that they realize that people do care about the integrity of the organic standards.

To [submit a written comment](#) to the NOSB, go to:

[https://www.regulations.gov/document?D=AMS\\_FRDOC\\_0001-1470](https://www.regulations.gov/document?D=AMS_FRDOC_0001-1470)

Once there, click on “Comment Now” in the top right corner. After that you may type in a short comment, or attach a longer document.

I am including the letter I submitted to the NOSB. My letter is rather long, but a single sentence or two will be enough! Please send in something. Let them know that you care. They are listening.

Many thanks,  
Dave Chapman

Dear NOSB,

My name is Dave Chapman. I own Long Wind Farm, a certified organic greenhouse operation in Vermont. We grow two and a half acres of greenhouse tomatoes in our fertile soil. I have grown vegetables organically for 35 years. We have been certified organic since the inception of Vermont Organic Farmers. I was the only commercial soil grower chosen to serve on the USDA Task Force that studied hydroponics. I am writing to offer my perspective on this issue, hoping that I can give some thoughts that might be helpful in your discussions. I appreciate that you already have an enormous report to digest, but this will give a more personal opinion.

The hydroponic debate in the NOSB has tremendous import for the future of the organic standards around the world. There is a real conflict between two very different visions of organic right now. Whatever the NOP ultimately decides might change what organic means around the world. In this age of bilateral trade agreements, it will prove almost impossible for the EU to maintain strong organic standards if the US does not. The organic community in Europe is very concerned about this debate, and is watching closely to see what the NOSB does.

On the one hand, there is the wide held traditional belief that organic farming is based on cultivating and improving the fertility of the soil. That is the foundation upon which all of organic farming has stood since the beginning. “Feed the soil, not the plant.” There is a whole world in that simple phrase.

On the other hand there is the belief that organic should be solely defined by the use of approved “natural” fertilizers, pesticides, and other inputs, and the “growing medium” becomes unimportant. This perspective favours the approach of conventional agriculture: “Feed the plant, not the soil.” By this logic, a tomato grown in coconut husks can be organic as long as it is fed approved fertilizers and is only sprayed with approved pesticides. By this logic, a chicken can live all its life in a factory and still be organic, as long as it is fed organic grain and is only treated with approved medicines.

Most organic farmers support the traditional beliefs. Our farms are an effort to make those beliefs a reality, finding ways in which the health of the crops, and the health of those who eat those crops,

can be strengthened by how we manage the soil. For most organic farmers the decision to farm organically is not based on economics, although we all want to survive and thrive in the economic arena.

It is inevitable that the hydroponic industry would want to gain access to the organic market, where a premium is usually paid for producing food in a way that emphasizes long term health over short term profit. The hunger of the hydroponic industry to enter the organic arena is based on a desire to take advantage of these lucrative markets. Hydroponic growing has long since taken over conventional greenhouse production of fruits and vegetables. In the world of conventional greenhouse production, virtually 100% of it is now hydroponic. It works. It is efficient and productive. But there is no real science to guide us how a diet of all hydroponic food would affect us.

In Europe, 99% of the organic greenhouse production is grown in the ground. Most EU countries require that. Growing in the ground is the foundation, much more needs to happen for organic farming to succeed. Growing in the ground is the base, but not the whole story. I mention this to remind you that growing in the ground is very possible in greenhouses. I have done it successfully for 35 years. Our tomatoes are delicious and nutritious. When customers buy our tomatoes in a store, they are getting what they expect an organic tomato to be.

In Europe there are over 10,000 acres of protected organic production in the ground. It does work. It will never be as productive in terms of labour and yields as hydroponics. As with most other forms of organic agriculture, we gain in flavour and nutrition, but not in pounds of food per square foot. When we hear a call for innovation, let us remember that not all innovation requires redefining what organic means. There is tremendous innovation in soil growing of greenhouse vegetables going on now, just as there is in every other style of organic production.

On the Task Force, there was a tension between the proponents of traditional organic and the hydro supporters over an important issue. The soil people could never get a clear answer to the basic question, "What do you fertilize with?" We were given long lists of every approved fertilizers, and told that the answer was somewhere in that list. But we were not given a clear answer about the fertility program for any particular operation. It seemed incredible that the hydro volunteers for the USDA Task Force were not willing to share this information. The whole purpose of the Task Force was to learn how "organic hydroponic" worked.

Why did we keep asking that question? Because we didn't believe that the natural biological processes of the soil community could possibly be replicated in a pot of coconut husks. Even with the addition of compost tea, the biological complexity of a hydroponic system is paltry compared to that of a robust soil community. We believed that many 'conventional' fields had greater biological complexity than the "organic hydroponic" systems. We believed that the only way that plants could thrive in a hydroponic system was with the addition of highly processed fertilizers like micronized fish and hydrolyzed soy protein. These fertilizers are highly soluble and plant available, and it is questionable whether they should even be allowed in organic growing. Certainly they should not be the BASIS of an organic fertility program.

But every time we asked what the hydro growers fertilized with, we got the same answer that the NOSB got when you asked the same question of the task force representative in the Spring meeting. We were told “compost tea” was how they fertilized. Let us be clear about this. Compost tea might be a source of microbes for a biologically starved system, but it is not a source of much N, P, K. If you grow a tomato in a pot of coconut husks, and try feeding it only with compost tea, then you will quickly have a very unhealthy and hungry plant with little to no production of tomatoes.

A more honest answer finally came at the very end of the Task Force, when a report was belatedly presented on the practices of a grower for Driscoll’s Berries. The report described berry operations that grow in pots filled with coconut husks, and fertilize with micronized fish. There is no compost tea. It is a straightforward hydroponic operation, and it is very productive with high yields. It enables them to grow “organically” in the desert. This is significant information, as we were told that Driscoll’s right now contracts over 1000 acres of hoopouses (polytunnels) filled with “organic” hydroponic berries. This makes Driscoll’s the largest “organic hydroponic” producer in the world. All of this hydroponic production has been started AFTER the 2010 NOSB recommendation saying hydroponics should not be called organic.

Clearly they are able to successfully grow hydroponically by adding approved soluble fertilizers without “adding biology”. They are feeding the plant, not the soil. Indeed, there is no soil involved.

There has been a strong response to the issue of hydroponics from the organic community. Last Spring the NOP was presented with a letter calling for a moratorium on all new hydroponic certification. 40 concerned organizations from the US and the EU signed the letter. These organizations represented over two million members. It was also signed by a number of prominent voices in the organic community and 15 former NOSB members. A small group of farmers who supported the moratorium met with Elanor Starmer and Miles MacEvoy at that time, urging the NOP to act. Administrator Starmer showed great support for the moratorium, having gone so far as to write a letter calling to stop new hydro certification, but the USDA lawyers insisted that the issue had to be resolved through the rulemaking process of the NOSB and NOP.

The moratorium letter started with seven farmers. It was followed by a letter from Senator Patrick Leahy also calling for a moratorium. Senator Leahy was a sponsor of the Organic Food Production Act. This letter was addressed to Secretary Vilsack. Again, this letter was not met with any action.

And so now the NOSB has a difficult decision to make. It is clear to most of us that the language of OFPA requires growing in the soil. It is clear that the only in-depth study of this subject by the NOSB led to the recommendation that hydroponic should not be certified as organic. It is clear that most of the organic world agrees with this conclusion. It is clear that the community of organic farmers in America overwhelmingly supports keeping the organic standards strong in this area. So why is this a difficult decision? Because of money. There is now a lot of money being made by hydroponic producers. It is a fairly simple example of money versus people. If there was no money involved, this decision would be a slam dunk.

If the NOSB is unable to make a strong, clear recommendation to end the inclusion of hydroponics, then organic will be redefined by the NOP to allow hydroponics. This is exactly why the NOSB was created in the first place, to prevent this kind of corporate takeover of the NOP. Senator Leahy and others knew that there would be great pressure on the NOP to change the meaning of organic over the years. And so you were created. Now is the time for you to do your job, and represent real organic. We need you.

This is a time when the USDA is supporting the Healthy Soil movement through serious efforts of the Natural Resources Conservation Service. California is working to build a Healthy Soils Initiative for all its farmers. The climate change movement is embracing strategies for recapturing carbon through building healthy soils. And even the NOP is insisting that organic hens and cows must be granted access to the soil.

How can we settle on less for organic vegetables? How can we allow organic farming to become a system where soil is secondary?

Organic growing should be limited to growing in the ground. We should allow containers to be used for transplants and for ornamentals and herbs that are sold in the same containers they were grown in. In Europe, they allow this with the understanding that the consumer can clearly see when the plant wasn't grown in the ground. They allow sprouts and microgreens to be grown in containers, because no fertilizers of any kind are added after planting. But all other vegetables must be grown in the ground, with no barriers between the topsoil, the subsoil, and the bedrock. It is very easy to understand, and very easy to enforce at inspection. It works well in many countries, including England, France, Belgium, Holland, Spain, and Germany.

If you decide to allow full production in containers, you will be stepping onto a slippery slope. In container growing it will be very difficult to stick to the basic principles of organic farming. There will be great efforts to game the system by hydroponic growers, as the NOP struggles to regulate how much soil will be required in a container. It is not a complicated thing to have a hydroponic system take place in a pot of soil. That is why most of the world has chosen to keep the standards simple and clear.

It is important that the NOSB acts quickly. Every day more hydroponic growers are getting certified. Every day hydroponic continues to infiltrate organic. Every day the organic label becomes less meaningful. Soon the hydroponic growers in organic will be too big to fail. Delay is their best strategy.

We are facing a crisis of confidence in the USDA organic program. People are losing faith, turning to "local" over "organic", because they no longer trust what the organic seal stands for. For many, the USDA seal has come to represent "Certified Sort Of Organic." Help us change that. The NOSB was created to safeguard organic. Help us turn fear and anger into hope. Show that the system can work. Do the right thing. Keep the soil in organic.

Many thanks,  
Dave Chapman, Long Wind Farm

Hi all,

You are included in this letter because you have supported the movement to keep the soil in organic. You have either voted for the 2010 NOSB recommendation, or signed one of the petitions or moratorium letters calling for organic growing to stay in the soil. The other thing you all have in common is that you haven't yet sent in a written testimony to the NOSB on this issue. I am encouraging you to take the four minutes to do that. Many of you have served on the NOSB, and you know how important it is to let the current members know that the people of the organic community care about this. The Coalition for Sustainable Organics (which should be called the Coalition for Hydroponic Organics) has organized a strong campaign to get the workers in the hydro greenhouses to send in a form letter to the NOSB. I think it is important that the NOSB hear from the rest of us!

There is a lobbying effort to put off a vote on the Crop Subcommittee proposal. Delay is our enemy. Urge the NOSB to vote now on the proposal to reject hydroponics.

Please click on the link below to testify. Do it NOW! Just send a few words if time is short. Be more eloquent if you are so inclined. If you are getting this letter, your voice has considerable weight in the organic community. You are 75 of the most influential people in the organic movement. You are respected as one of the pioneers who created the organic movement in this country. You are an elder who is listened to because you have earned it. Please take advantage of that position to speak out on the issue of the hydro invasion. We must speak up or lose it.

**[Testify to the NOSB!](#)**

After you have testified, please forward this letter to someone I might have missed who understands what the word organic means.

I am including a link to a recent article from The Packer. It is remarkably neutral, coming from a magazine that is written for the conventional produce industry. As far as I know, it is accurate in its clear description of the current state of affairs in the NOSB, except that it doesn't report the efforts to block the proposal from coming to a vote at all. We are at a critical juncture in the path of the organic label. Either we will push hydro out of organic, and sustain the true meaning of the word, or we will fail, and organic will devolve into another general term as meaningless as "natural". There is a battle going on to reform the animal welfare standards, and there is a battle to reform the vegetable and berry standards. We are all trying to keep the meaning in organic. Please step up and participate. We need your help.

Many thanks,

Dave Chapman  
Long Wind Farm

**[the Packer article](#)**