



PO Box 50045  
Watsonville, CA 95077-5045  
831.763.3200 Driscolls.com

Ms. Michelle Arsenault  
Advisory Committee Specialist  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2648-So., Ag Stop 0268  
Washington, DC 20250-0268

**RE: Comment on the National Organic Standards Board Crops Subcommittee Proposal Hydroponics and Container-Growing Recommendations, August 28, 2017**

October 9<sup>th</sup>, 2017

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Crops Subcommittee Proposal Hydroponics and Container-Growing Recommendations. Driscoll's appreciates the commitment and tenacity of the National Organic Standards Board volunteer members and greatly values the public comment period as an important process to inform decision makers.

Driscoll's is family owned and has been passionate about growing fresh organic berries since 1997. From the beginning, we have continued to pave the way for innovation in the organic berry market. We are headquartered on the California Central Coast in Watsonville, CA and partner with independent organic family farmers who grow blackberries, blueberries, raspberries and strawberries using both in-ground and container production practices. We work with extremely small, to medium and large sized organic growers in different geographic areas to ensure year-round organic berry supply for consumers.

As an industry leader in organics who believes in producing healthy food while being good stewards of the land, we believe the container growing recommendations included in this proposal are in direct conflict with organic principles. Therefore, Driscoll's requests that the NOSB members reject and vote no on the subcommittee proposal as shown here:

**RE: Container-Growing Recommendations:** Motion that for container production to be certified organic, a limit of 20% of the plants' nitrogen requirement can be supplied by liquid feeding, and a limit of 50% of the plants' nitrogen requirement can be added to the container after the crop has been planted. For perennials, the nitrogen feeding limit is calculated on an annual basis. Transplants, ornamentals, herbs, sprouts, fodder, and aquatic plants are exempted from these requirements.

If the subcommittee proposal were passed by the NOSB and adopted into regulation it would require a producer to:

- Have 50% of the total plant's nitrogen demand for the year, present the day of planting in soil mix
- Apply only an additional 30% of total nitrogen demand through top dressing
- Apply the remaining 20% of nitrogen demand through the drip system
- Recalculate perennial plant nitrogen application limits every year

We believe these practices are in direct conflict with organic principles. A grower would not be able to properly adjust to site specific conditions and would not be able to maximize the conditions in the rootzone making it extremely challenging to be a good steward of the land.

Driscoll's actively participated with the NOSB task force on container production standards and has provided comment and testimony in previous NOSB meetings. Driscoll's has consistently held the position that container production can be done in accordance with the Organic Foods Production Act (OFPA) by integrating cultural, biological and mechanical practices that foster the cycling of resources, promote ecological balance and conserve biodiversity. Driscoll's comments submitted in October of 2016 documented the research we have done that shows the diverse biological activity in our container production systems. Our previously submitted testimony also documented the importance of adding diverse biology to our production systems.

Our agronomic team has done years of research on the pattern of plant nutrient uptake. We know that perennial berry plants do not take up the majority of nutrients in the first six months. The container environment generally has a higher average daily temperature than soil in the same environment. This means that the mandated nitrogen levels would break down and cycle out of the rootzone before the plant was large enough to consume the provided nutrition. This would also cause the grower to expose a very young plant to high levels of salinity which is detrimental to most plants during establishment, one of the most critical phases of growth. Furthermore, this would likely cause large amounts of unused nitrogen to leave the containers. None of these things are in the best interest of the plant, the environment, or the grower. We believe that it could be more constructive to develop standards that address the active biology in the rootzone and the reduction of leaching that may have negative environmental impacts including the loss of resources.

In the introduction to the proposal the Sub-Committee compared the use of liquid feeding to the use of sodium nitrate. This is not an accurate comparison; nitrate is an ionic form of nitrogen directly available to the plant. The majority of all organic nitrogen fertilizers are protein based and in protein form. Whether they are solid or liquid, they require microbial activity to break down into ionic form for plant uptake. This is why Driscoll's production systems place emphasis on creating conditions that will support diverse biological activity and introduce biological diversity to the system. We are concerned that the subcommittee

proposal is based on faulty logic by comparing current container production systems to the use of a fertility product that is not used in our organic production.

This proposal has a large impact on perennial plant production. There is no practical explanation for how a grower could grow the same plant in containers for many years. Currently our largest certified organic container acreage crop is blueberries. Growers are targeting at least six years of production from a single planting. If 80% of annual nutrition must come from solid fertilizer, how would a grower practically do this? It is not possible to top dress that amount of nitrogen. The only solution under this proposal would be to re-pot the plants every year which would waste valuable resources and damage the plant.

This recommendation is extremely prescriptive and dictates how every farmer should manage the nitrogen fertility for every terrestrial plant and is not consistent with the way the NOP program works for soil production. During the spring NOSB meeting it was discussed that there would not be a double standard for soil and container production, that the same principles and procedures should apply to both.

Driscoll's urges the board to vote no on this proposal. We believe the proposal should be sent back to subcommittee for further work to ensure all the proper effort has been put forth to create meaningful standards that are in line with the organic principles.

Driscoll's thanks the National Organic Standards Board for the opportunity to comment and their commitment to seek opportunities in advancing organic agriculture while protecting the integrity of the program.

Thank you for your consideration.

Sincerely,



Soren Bjorn  
President, Driscoll's of the America's