



June 17, 2024

Dr. Jennifer Tucker
Agricultural Marketing Service
United States Department of Agriculture
1400 Independence Avenue SW
Mail Stop 0268, Room 2648-S
Washington DC 20250-0268

RE: Legal complaint and request for action regarding certification by Ecocert SAS and Control Union Certifications of multiple producer groups exporting turmeric grown in Fiji

Dear Dr. Tucker,

We respectfully request that your office thoroughly investigate and take appropriate enforcement action to address apparent violations of the NOP requirements for certification.

Based on OrganicEye research, it appears that at least two accredited certifiers – through incompetence, indifference, or intent – fail to accurately indicate the appropriate certification scope for CROPS and WILD CROPS applied to producer groups exporting turmeric root from Fiji.

Whether used in the certifiers' own communications or the communications of the certified operation itself, the terms CROPS and WILD CROPS appear to be interchangeable, for example:

1. Produce Processing Pte Limited

Certified by: Ecocert SAS, formerly Ecocert SA, Operation ID 7880231568
Scope: **Crops, Handling** (NOTE: Not certified for Wild Crops scope, although Ecocert describes them as “Wild picker, Manufacturer/Processor, Specialist wholesaler.”¹)

2. Saurabh Patel Export & Import

Certified by: Ecocert SAS, formerly Ecocert SA, Operation ID 7880223995
Scope: **Crops, Handling**² (NOTE: Not certified for Wild Crops scope while operator website states: “Fiji Turmeric Root that grows wild in the mountain...”³)

3. Ashwin Export and Import

Certified by Ecocert SAS, formerly Ecocert SA, Operation ID 7880215650

¹ <https://certificat.ecocert.com/company/4665680B-11D5-482F-99DE-2B31A391AD29>

² <https://organic.ams.usda.gov/Integrity/CP/OPP?cid=24&nopid=7880223995>

³ <https://sbimalorganicurturmeric.com/#testimonial>

Crops, Handling⁴ (NOTE: Not certified for Wild Crops scope, while operator website states: “Turmeric is grown wildly in the interiors of Fiji.”⁵)

4. Island Magic (Fiji) Pte. Limited

Certified by: Control Union Certifications, Operation ID 1780867269

Scope: **Wild Crops, Handling**⁶ (NOTE: Not certified for Crops scope, while operator website states: “Farm land has been USDA organically certified.”⁷)

5. Terra Whole Foods Pte Ltd

Control Union Certifications, Operation ID 1780893352

Scope: **Wild Crops, Handling**⁸ (NOTE: Not certified for Crops scope, while operator website states: “Our natural Fiji environment provides the ideal conditions for farming throughout the year...” and “Contrary to the belief that small scale farming cannot produce consistent crops...”⁹)

Also *Certified by:* Ecocert SAS, formerly Ecocert SA, *Operation ID 7880254516*

Scope: **Crops, Handling**¹⁰

Based on examining websites and other market materials from these operations, there is confusion about which certification scope they are operating under and whether/how they are keeping wild and farmed products separate.

Thousands of organic farmers expecting the highest standards and ethics from accredited certifiers deserve the protection of their business and practices from misrepresented and possibly unfair competition, which may impact their ability to continue farming while employing the practices they believe in.

These protections are outlined by the Organic Food Production Act that codified this movement into law. More importantly, the interest of consumers, paying a premium for organic food in the marketplace, must be protected. That was the intent of Congress.

Please keep us informed of the status of this request.

Sincerely,

Mark Kastel
Executive Director

OrganicEye
PO Box 8
La Farge, WI 54639

⁴ <https://organic.ams.usda.gov/Integrity/CP/OPP?cid=24&nopid=7880215650>

⁵ <https://web.archive.org/web/20231206095908/http://ashwinexportandimport.com/>

⁶ <https://organic.ams.usda.gov/Integrity/CP/OPP?cid=21&nopid=1780867269>

⁷ <https://islandmagic.net/>

⁸ <https://organic.ams.usda.gov/Integrity/CP/OPP?cid=21&nopid=1780893352>

⁹ <https://terrawholefoods.com/what-we-do/>

¹⁰ <https://organic.ams.usda.gov/Integrity/CP/OPP?cid=24&nopid=7880254516&ret=Search&retName=Search>