Dear Dr. Moeller,

The undersigned groups represent the major biosolids producers and other key stakeholders in North America, collectively managing thousands of tons of biosolids on a daily basis. We have followed with great interest GlobalG.A.P.’s efforts to expand good agricultural practices across the globe and share your objective of ensuring sustainable food production that protects human health and the environment. While we share similar goals, we are aware that your organization’s production standards prohibit the use of biosolids of any kind – a limitation that we believe conflicts with your stated mission of sustainable agriculture.

An outright ban on the use of biosolids sends the wrong message to producers and the public and unnecessarily restricts the beneficial reuse of a material that has many advantages over commercial fertilizers. Such restrictions can lead to less sustainable management methods for biosolids, including landfills, which has broader environmental consequences.

We would like to learn more from you and your staff about your choice to prohibit the use of biosolids within the GlobalG.A.P. standard and discuss with you some of the benefits, opportunities and challenges we face in managing this resource.

The organizations represented on this letter include non-profit trade associations, professional membership groups, technical committees, researchers, farming cooperatives and municipalities focused on the management of biosolids at the local, regional, and national levels throughout North America. The National Association of Clean Water Agencies (NACWA), based in Washington, DC, would welcome the opportunity to host you at its office for a meeting with the undersigned groups. Alternatively, we could convene a discussion at your office in Baltimore at a date and time that is convenient for you.

We hope you are amenable to further dialogue on this issue and look forward to hearing from you soon. Please contact Chris Hornback, NACWA’s Chief Technical Officer at 202/833-9106 or chornback@nacwa.org to coordinate a meeting.

Sincerely,

NATIONAL ASSOCIATION OF CLEAN WATER AGENCIES (NACWA)
WATER ENVIRONMENT FEDERATION (WEF)
CALIFORNIA ASSOCIATION OF SANITATION AGENCIES (CASA)
MID-ATLANTIC BIOSOLIDS ASSOCIATION (MABA)
NORTH EAST BIOSOLIDS & RESIDUALS ASSOCIATION
NORTHWEST BIOSOLIDS
VIRGINIA BIOSOLIDS COUNCIL