



April 21, 2025

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP

Docket: AMS-NOP-24-0081

RE: Crops Subcommittee
Proposal: Compost, Feedstocks, and the National List
Discussion Document: Compostable Synthetic Food Packaging Plastics and Cellulosic Fiber-Based Materials

Dear Ms. Arsenault:

Thank you for this opportunity to provide feedback to the Crops Subcommittee on its proposal and discussion document relating to the evaluation of compost feedstocks. The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, material input providers, and others. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

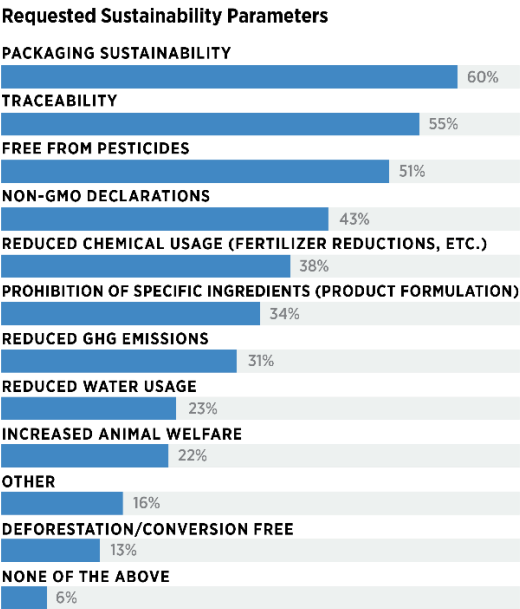
As a cornerstone of organic crop production systems, OTA appreciates the Board's thoughtful consideration of compost and the feedstocks that go into its production. As we noted in our fall 2024 comments, OTA supports the Subcommittee's proposal unanimously passed at that meeting to amend the practice standard. As we also noted in our comments in the fall, we do not take a position on the Subcommittee's approach to the evaluation of synthetic feedstocks in compost, however we understand the Subcommittee's desire to evaluate synthetic feedstocks consistent with the existing National List evaluation process.

We support the Subcommittee's current work to better understand and evaluate the suitability of compostable polymers and look forward to reviewing the forthcoming technical report (TR) on resins and formulated products that meet specific ASTM standards. As the Subcommittee continues its review, we reiterate our suggestion from the fall that it also address the wide use of noncompostable plastics, as used in plastic mulch film, and the potential for alternatives to these mulches such as biodegradable biobased mulch.

While mulch presents an opportunity in the field, organic consumer preferences are pointing to similar opportunities in the produce and grocery aisles. We'd like to share some fresh insights from our recent Organic Market Report, an annual survey of industry members to understand trends in the organic



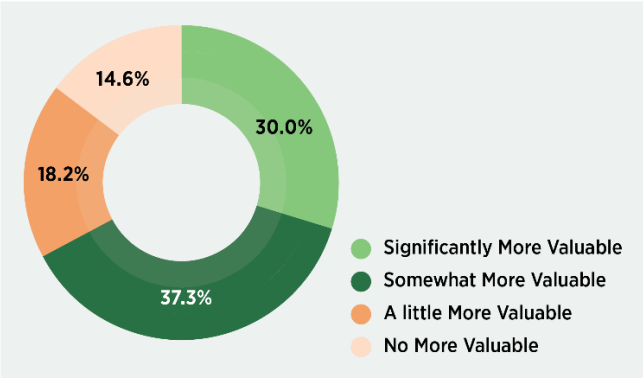
marketplace. This year, we queried members on several aspects of sustainability which demonstrate the increasing requests to see less plastic in consumers’ baskets. When asked “In what areas of sustainability are retailers (or other direct customers) asking for you to take action?” respondents put packaging sustainability at the top of the list.



Source: Organic Trade Association's 2025 Organic Market Survey conducted 10/31/2024–1/27/2025. Q: "In what areas of sustainability are retailers (or other direct customers) asking for you to take action? (Select all that apply)"

When asked “How much more valuable would organic certification be to your organization if it could also be used to verify more of these sustainability requests?” over 2/3 respondents noted they would find certification either somewhat or significantly more valuable and over 85% would see added value.

Increased Value of Organic If Meeting Sustainability Requests



Source: Organic Trade Association's 2025 Organic Market Survey conducted 10/31/2024–1/27/2025. Q: "How much more valuable would organic certification be to your organization if it could also be used to verify more of these sustainability requests?"

When asked “What specific retailer/customer requests have you received or what actions has your company taken to address packaging sustainability requests?” respondents rated highly the use of compostable packaging as well as the elimination of plastic.

Packaging Sustainability Requests

USE OF RECYCLABLE PACKAGING



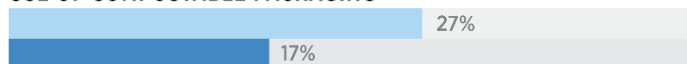
ELIMINATION OF PLASTIC



REDUCTION OF PACKAGING WEIGHT



USE OF COMPOSTABLE PACKAGING



■ Requests Received ■ Changes Implemented

Source: Organic Trade Association's 2025 Organic Market Survey conducted 10/31/2024–1/27/2025. Q: “What specific retailer/customer requests have you received or what actions has your company taken to address packaging sustainability requests? (Select all that apply)”

We know consumers place value on the organic brand and are now clearly expressing an interest in addressing other sustainability goals. While organic may not be able to meet every consumer expectation, there is real opportunity it can embrace some of these sustainability goals if we find substances that align with our common organic vision. Creating a dichotomy between organic certification and sustainable packaging will create headwinds for growing the organic marketplace and organic adoption by sustainability minded consumers. Organic—and conventional—production relies on tremendous amounts of nonbiodegradable, unrecyclable plastics in the field as well as in packaging. Organic has indicated a desire to move beyond this reliance by placing in the regulation an allowance for biodegradable biobased mulch, referencing some of the same or similar ASTM standards for degradability as will be evaluated in the coming TR.

However, no commercially available mulches exist that meet the requirements of the regulation, and we see continued use of nonbiodegradable plastic mulches. While these are required to be removed from the field at the end of the growing or harvest season before they can degrade, weather, exposure and the practicalities of farm machinery and movement in the field see some of this degrade before it can be removed.

While we may be uncomfortable with some biodegradable synthetics, we must ask to what degree are we comfortable with the continued use of nonbiodegradable plastics and synthetic microplastics that don't break down at all. Perfect solutions are rare, and tradeoff decisions must be made in the context of



real-world challenges, not theoretical protocols. Synthetic contamination of farms can occur through various practical avenues, such as poorly maintained equipment, inadvertent water contamination, or inadvertent litter.

With current composting standards, the physical removal of plastics from waste streams is unlikely to be completely effective. The Subcommittee is taking positive strides to address some of these concerns as they relate to compost with its distinction of contamination as that which can be removed from compost feedstocks, and unavoidable residual environmental contamination (UREC) as that which cannot be avoided. As a community we have accepted some of these small compromises and recognize organic does not exist in a “pure” environment.

While taking into consideration the findings of the forthcoming TR and through its deliberations as it considers the types of biodegradable plastics that might be acceptable in organic production, we encourage the board to challenge itself to explore the relative sustainability of real-world tradeoffs and the collective impact of not engaging in the efforts to reduce the reliance on plastics.

On behalf of our members across the supply chain and the country, OTA thanks the National Organic Standards Board for the opportunity to comment, and for your commitment to furthering organic agriculture.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Scott Rice", is positioned above the printed name.

Scott Rice
Sr. Director, Regulatory Affairs
Organic Trade Association

cc: Tom Chapman
Co-CEO
Organic Trade Association