



April 5, 2021

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

Docket: AMS-NOP-20-0089

RE: Crops Subcommittee – Paper-based Crop Planting Aids (Proposal)

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the National Organic Standards Board (NOSB) Crop Subcommittee's Proposal on Paper-based Crop Planting Aids.

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, representing over 9,500 organic businesses across 50 states. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

Summary

- ✓ OTA continues to support the allowance of paper to be planted in the soil when used as a planting aid because paper is already allowed for equivalent uses (e.g., as mulch).
- ✓ We support the key tenants of the proposed definition and listing of paper-based crop planting aids, and commend NOSB's diligence to take in and respond to stakeholder suggestions for improvement.
- ✓ We identify a few non-substantive items for further clarification in the proposed definition and listing, and support NOSB in passing this proposal at this meeting.

We offer the following more detailed comments:

Background

Paper planting pots have been [petitioned](#) for inclusion on the National List as an allowed input. Paper pots and other growing container and production aids are used to support seeding, growing and/or transplanting in the field, and are intended to remain in the soil. NOP has authorized continued use of these materials while NOSB completes its deliberation.

Nitten paper chain systems, which are the subject of the petition, are used to facilitate transplanting closely spaced crops such as onions, salad greens, herbs, and others crops. In addition to paper, the

products are formulated with several adhesives. Newspapers and other recycled papers are already allowed as synthetic substances for use as mulch and as a compost feedstock. Certifiers have historically extended the allowance for paper to its use in transplant pots, even though paper isn't specifically on the National List for this use. This petition was submitted for NOSB to specifically address the use of paper as a production aid for transplants intended to be planted into soil. Throughout the course of NOSB deliberation, the scope has expanded to include other paper-based planting aids such as seed tapes that are incorporated into the soil.

Several discussion documents have previously been presented by the Crop Subcommittee in fall 2018, spring 2019, and fall 2019. A [Technical Report](#) was commissioned in 2019 to provide information about the range of synthetic fibers and adhesives used in these types of paper-based crop planting aids. The Board continues to collect and evaluate information to distinguish between synthetic paper fibers and synthetic fibers that are not strictly paper, also whether such fibers are biobased and/or biodegradable.

The first [proposal](#) was presented by the Subcommittee in spring 2020 for a new definition and listing to be added to the NOP regulations to allow the use of paper-based planting aids under certain conditions. That proposal did not pass, and a new [proposal](#) was presented in fall 2020 that also did not pass. The Subcommittee continues to work diligently to craft an annotation that captures the detailed composition metrics of paper-based planting aids that meet the needs of organic producers and product manufacturers, while complying with Organic Food Production Act criteria for the National List.

Proposed Definition and Listing

The Subcommittee proposes to add the following definition and listing to the NOP regulations:

Add to §205.2 (Terms Defined):

Paper-based crop planting aid. A material that is comprised of at least 60% cellulose-based fiber by weight, including, but not limited to, pots, seed tape, and collars that are placed in or on the soil and later incorporated into the soil, excluding biodegradable mulch film. Up to 40% of the ingredients can be non-synthetic, other permitted synthetic ingredients at §205.601(j), or synthetic strengthening fibers, adhesives, or resins. Contains no less than 80% biobased content as verified by a qualified third-party assessment (e.g. laboratory test using ASTM D6866 or composition review by qualified personnel). Added nutrients must comply with §205.105, 205.203, and 205.206.

Add to §205.601 (National List):

Paper-based crop planting aids as defined in 205.2. Virgin or recycled paper without glossy paper or colored inks.

OTA continues to support the allowance of paper to be planted in the soil when used as a planting aid because paper is already allowed for equivalent uses (mulch, compost feedstock) that have been determined by NOSB to meet OFPA criteria for synthetics on the National List.

The necessity of paper-based planting aids for production has also been communicated in our previous comments and directly from other stakeholders. The use of paper chain pots and other paper-based crop

planting aids has been highlighted by OTA members as a necessary part of their operation, from small to commercial scales of production, due to the absence of natural alternative products and management practices that would achieve the equivalent level of efficiency (of time and labor), quality (of crops produced), and waste reduction (of plastic trays, for example).

We agree with the scope of review in the Subcommittee’s proposed definition that is inclusive of generic products that are paper-based and used as planting or seeding aids left to degrade in the soil (e.g. pots, chains, seed tape). This is an appropriate balance of scope, and is consistent with OTA’s previous comments that encouraged a scope of review that would make efficient use of NOSB’s efforts to review the existing variety of paper-based planting aids that share these key common characteristics of being paper-based, used as planting or seeding aids, and were are left to degrade in the soil.

We support the key tenants of the proposed definition and listing of paper-based crop planting aids and commend NOSB’s diligence to take in and respond to stakeholder suggestions for improvement. The Subcommittee has undertaken thoughtful and science-based consideration of this range of products over the past three years. The Subcommittee actively pursued technical information through a third-party technical report and has worked constructively with stakeholders across the organic community and input manufacturing industry. The proposal presented at this meeting is the result of a sound process for evaluation of materials in accordance with OFPA. We also appreciate NOP for permitting the use of previously approved paper pots while NOSB continues its deliberation on the petition, allowing NOSB to take its time to complete a thorough review and also avoiding disruptions to organic producers who have been using these materials in good faith.

We identify a few non-substantive items for further clarification in the proposed definition and listing to ensure clear and consistent implementation, and support NOSB in passing this proposal at this meeting.

- The listing motion should refer to paragraph (o) not (p) on the National List §205.601.
- The phrase in the definition, “other permitted synthetic ingredients at §205.601(j)” is unnecessary, may cause unintended confusion, and can be likely removed without compromising the intent of the Subcommittee. Material reviewers should review intended added ingredients with the relevant subsection of the National List. This is the same argument that has been made in the past about fungicides needing to be reviewed to §205.601.
- The last sentence in the definition, “Added nutrients must comply with §205.105, 205.203, and 205.206” is unnecessary, may cause unintended confusion, and can be likely removed without compromising the intent of the Subcommittee. This statement is establishing compliance of ingredients outside the defined term is inappropriate for definitions section of the regulations and is better suited for a National List annotation. Furthermore, it is unnecessary for every individual National List item to refer back to practice standards as these should be inherent in the initial review and approval of substances by certifiers.



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 that reads "Johanna Mirenda".

Johanna Mirenda
Farm Policy Director
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association