

April 4, 2019

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2642-So., Ag Stop 0268  
Washington, DC 20250-0268

**Docket:** AMS-NOP-18-0071

**RE: Crops Subcommittee – Paper (Plant Pots and Other Crop Production Aids) (Discussion)**

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Crops Subcommittee’s Discussion Document on Paper (Plant Pots and Other Production Aids). The Subcommittee is inviting discussion on a petition for the addition of paper planting pots to the National List for use in organic crop production.

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).
- ✓ OTA supports the decision by NOSB to expand the scope of review to be inclusive of generic products that are paper-based and used as planting or seeding aids.

**We offer the following more detailed comments:**

### **Background**

NOSB received a petition in August 2018 for the addition of paper planting pots to the National List: “§205.601(o) production aids - Plant pot or growing container-hemp or other paper, without glossy or colored inks.” Paper pots are used as a vessel for growing transplants intended to be planted directly in the soil along with the plant material. Nitten paper chain systems, which are the subject of the petition, are used to efficiently transplant closely spaced crops as part of a non-motorized machine transplanting system; the petitioned materials is planted into the soil along with the plant material.

At the last meeting (fall 2018), NOSB presented a discussion document to solicit public comments on the necessity and environmental impact of paper pots and the availability of alternatives. In OTA’s comments at that time, we supported 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 also encouraged NOSB to take a broad approach for reviewing paper-based planting aids to be inclusive of generic products that are paper-based and used as planting or seeding aids. We also communicated that organic farmers identify these materials as a necessary part of their operation 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).

For the spring 2019 meeting, the Subcommittee has presented a second Discussion Document<sup>1</sup> that continues to explore the petitioned material. NOSB has expanded the scope of its review to include a variety of paper-based production aids including pots, seed tape, collars, and hot caps. The discussion document highlights NOSB's main concern about these materials, which is the use of synthetic fibers. While the NOSB awaits results of a Technical Review on this information, the following discussion questions are presented for stakeholder feedback.

**The Crops Subcommittee has posed the following questions for discussion:**

*1. Are there other paper-based production aids that are not mentioned in this discussion document beyond mulch, compost feedstock, pots, seed tape, hot caps, or collars?*

OTA supports the decision by NOSB to expand the scope of review to be inclusive of generic products that are paper-based and used as planting or seeding aids. The inclusion of hot caps suggests that NOSB intends to broaden the scope to include products that *aren't* intended to degrade in the soil. While OTA doesn't object to this broadened scope, it's worth acknowledging that NOSB's evaluation of these products against the National List criteria may be impacted by whether the product is or is not intended to degrade into the soil.

*2. What synthetic fibers are used in paper-based crop production aids, what is the percentage of synthetic fiber in the paper-based product, and how long, if at all, does it take for the synthetic fiber to completely biodegrade?* No comment.

*3. Are the synthetic fibers used in paper as a crop production aid, also used in newspaper or recycled paper that is currently allowed on the National List?* No comment.

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

Respectfully submitted,



Johanna Mirinda  
Farm Policy Director  
Organic Trade Association

cc: Laura Batcha  
Executive Director/CEO  
Organic Trade Association

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<sup>1</sup> <https://www.ams.usda.gov/sites/default/files/media/CSPaperPotDDWeb.pdf>