



BEYOND PESTICIDES

701 E Street, SE ■ Washington DC 20003
202-543-5450 phone ■ 202-543-4791 fax
info@beyondpesticides.org ■ www.beyondpesticides.org

April 1, 2019

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

Docket ID # AMS-NOP-18-0071-0001

Re. CS: Paper pots

These comments are submitted on behalf of Beyond Pesticides. Founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers, and farmworkers, Beyond Pesticides advances improved protections from pesticides and alternative pest management strategies that reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

Beyond Pesticides requests that additional information—beyond that presented in the 2017 technical review (TR) of newspaper and other recycled paper—be developed for the board's consideration of the paper pot petition.

It is our understanding that the requirement that newspaper and other paper used in organic crop production be recycled comes from a resource conservation perspective. At this point in time, with the knowledge we have gained from the TR, it is evident that the NOSB may not have all the information needed to evaluate paper pots with respect to the criteria in the Organic Foods Production Act (OFPA).

A technical review addressing paper pots in reference to OFPA criteria has been requested. That review of paper pots should provide more information about the paper and adhesives used in the paper pots, the source of the pulp used in pots produced by the petitioner and others, as well as an estimate of the scale of production, so that the NOSB can better assess the environmental impacts of these pots in comparison to recycled paper that is now allowed as mulch.

Based on the information in the new TR, the CS should develop a proposal that contains an annotation clarifying the materials and manufacturing processes that would be allowed. The NOSB should facilitate support for the domestic production of paper pots that are compatible with organic principles.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is fluid and cursive, with a prominent initial "T" and a long, sweeping underline.

Terry Shistar, Ph.D.
Board of Directors