



BEYOND PESTICIDES

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September 20, 2018

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

Re. CS: Paper pots discussion document

These comments to the National Organic Standards Board (NOSB) on its Fall 2018 agenda 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.

The Crops Subcommittee (CS) has received a petition that would allow the use of a paper pot system that is currently in use, and approved by several certifiers. This is an ingenious, low-tech system available only from one company in Japan. Those who use it are enthusiastic and have commented in support. Some certifiers have allowed it, but NOP has prohibited its use after the 2018 growing season based on the presence of an unapproved synthetic (an adhesive). The pots are also apparently made from virgin paper containing hemp. It is not clear whether the pots also contain virgin wood pulp.

We have expressed concerns about the many additives in paper, which include adhesives, such as those used in the paper pots. In terms of the characteristics of the pot as planted, these pots are probably no worse than the paper currently allowed. The CS is considering requesting a technical review (TR). The Maine Organic Farmers and Gardeners Association has requested delaying the prohibition at least until after the 2019 growing season to allow the petition process to unfold.

This is not on the NOSB's agenda as an action item. There is probably time for an American company—since supporters do not believe that the Japanese company would change its processes for a small American organic market—to produce the pots to be compatible with organic principles. (See our comments on the sunset of newspaper and other recycled paper.)

Beyond Pesticides supports the following:

1. The NOSB should recommend that the prohibition on paper pots be postponed, until after the 2019 growing season;
2. A technical review should be commissioned to look at the production processes and materials of currently available paper pots, as well as paper pots made by other processes; and,
3. NOP 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 long horizontal stroke at the end.

Terry Shistar, Ph.D.
Board of Directors