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September 29, 2021

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

**RE: Docket: AMS-NOP-21-0038
Crops Subcommittee
Biodegradable Biobased Mulch (BDM) Film**

Dear Ms. Arsenault:

Thank you for the opportunity to comment on the National Organic Standards Board Crops Subcommittee's proposal on Biodegradable Biobased Mulch (BDM) Film. Oregon Tilth appreciates the subcommittee's efforts to move this proposal forward.

Oregon Tilth supports the Crops Subcommittee's BDM Film proposal. We believe that this latest version of the proposal provides a realistic goal that is genuinely achievable. Oregon Tilth stands with others in recognizing the possibility that the technology to evaluate all possible environmental impacts of BDM Film--partially made with synthetics or petroleum products--does not currently exist. Still, we support those alternatives that mitigate the impact of plastics and that have no *known* adverse environmental impacts based on available data. We believe that this proposal accomplishes that goal.

Please reference Oregon Tilth's previous comments for additional remarks (links below).

Respectfully Submitted,

Oregon Tilth

Oregon Tilth is a leading certifier, educator and advocate for organic agriculture and products since 1974. Our mission to make our food system and agriculture biologically sound and socially equitable requires us to find practical ways to tackle big challenges. We advance this mission to balance the needs of people and the planet through focus on core areas of certification, conservation, policy and the marketplace.

Supporting References

1. [Oregon Tilth Article](#) - Using mulches and biodegradable biobased mulch film
2. [Oregon Tilth Spring 2020 NOSB Comment](#) - Biodegradable Biobased Mulch Film
3. [Oregon Tilth Spring 2021 NOSB Comment](#) - Biodegradable Biobased Mulch Film