



2525 SE 3rd Street | Corvallis, OR 97333 | www.tilth.org | PH 503.378.0690 | FX 541.753.4924 | organic@tilth.org

October 3, 2018

Ms. Michelle Arsenault, Advisory Committee Specialist
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. S.W.
Room 2642-S, Mail Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-18-0029
Crops Subcommittee – Paper Pots Petition

Dear Ms. Arsenault,

Thank you for the opportunity to provide comments to the National Organic Standards Board (NOSB) Crops Subcommittee (CS) *Discussion Document on Paper Planting Pots*. As an organic certifier who has reviewed different types of biodegradable pots requested for use by our certified organic producers, Oregon Tilth appreciates the complexity and nuance of this topic and the questions raised by the CS.

The petition for this product states “...[paper pots] has been historically allowed for the past 12 years by some organic certification agencies...” We believe that some historical context around certifier allowance of these types of products may be helpful to the NOSB.

- Oregon Tilth has historically prohibited the use of pots made from new (not recycled) biodegradable paper, including transplanting pots such as [EllePots](#) and paper chain pots.
- Inconsistencies around paper pots have been ongoing since 2013 when ACAs were polled to comment on whether they allow or prohibit such paper pots.
- Several ACAs as well as the Organic Materials Review Institute (OMRI) confirmed that they would not allow these products for use in organic crop production due to prohibited synthetics such as binders and poly fibers.
- In 2017, we became aware of operations “certifier shopping,” e.g., searching for certifiers that would allow the use of paper pots.
- In early 2018, the USDA NOP provided additional clarification that synthetic binders used in the production of many types of paper pots were not allowed.

Oregon Tilth supports the petition to allow synthetic paper production aids to 205.601(o) for the following reasons:

- Organic agricultural producers require additional resources. Oregon Tilth has received many requests from farmers to use paper chain transplanting pots and other types of biodegradable paper pots.



2525 SE 3rd Street | Corvallis, OR 97333 | www.tilth.org | PH 503.378.0690 | FX 541.753.4924 | organic@tilth.org

- Paper planting pots reduce producers' dependence on plastic, fossil fuels, and intensive labor needed for planting transplants, thereby increasing the sustainability of organic farming practices.

Paper planting aids made from biodegradable paper use special technology to manufacture the biodegradable fibers and in some cases require the use of specialty equipment that appears to be fairly unique compared to other products on the market. Oregon Tilth certifies 15 clients using OMRI-approved nonsynthetic fiber pots — Jiffy Pot and Fertipot — that are used to grow transplants that must be planted by hand. Paper chain pots allow one person to transplant hundreds of seedlings in minutes using their proprietary transplanter, a cost-savings critical for farm viability.

We are in support of allowing operations, who have been approved to use these products by their certifier, to continue using them until a final determination is made via the petition process. It is important to note that the petition process can be time-consuming and we encourage the USDA NOP to continue to allow the use of paper pots already approved during this stage of the process.

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 planet through focus on core areas of certification, conservation, policy and the marketplace.