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April 3, 2020

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

**Docket** AMS-NOP-19-0095

**Crops Subcommittee Discussion Document: Biodegradable Biobased Mulch Film**

Dear Ms. Arsenault,

Thank you for the opportunity to comment on the National Organic Standards Board (NOSB) Crops Subcommittee's (CS) Discussion Document on biodegradable biobased mulch film. Oregon Tilth appreciates the Subcommittee's approach in the discussion document reconsidering the material listing for biodegradable biobased mulch film per §205.601(b) and the term biodegradable biobased mulch film as defined in §205.2.

Due to the fact that no biobased and biodegradable mulches are commercially available at this time, nor have any been developed in the eight years since this material was added to the National List, allowing partially biobased biodegradable plastic mulch would permit the use of more environmentally friendly options by reducing plastic waste from the removal of plastic mulch at the end of each season. The questions in the discussion document are moving in a sound and sensible direction for allowing the use of this material.

As a certifier, Oregon Tilth can specifically address question three, which asks about mulch films that could be engineered to include macro- or micro-nutrients or pesticides. Any added pesticides and/or nutrients in a planting aid must be allowed for use in organic production. We would consider any mulch containing prohibited pesticides or nutrients mulch to be a prohibited input and not allowed for use in organic production, and any use would result in a noncompliance per §205.201(a)(5).

Regarding the suggestion to require a minimum percentage of biobased content (similar to the proposal on paper based planting aids), we are supportive of this approach but request clarification on how the biobased percentage must be determined. We support a simple and robust verification process whenever possible.

We urge the Board to take a sensible approach to biodegradable biobased mulch that considers both the potential environmental impacts of a partially biobased biodegradable mulch, as well as the commercial availability of biodegradable mulches that meet producer needs. Reducing plastic waste while providing organic producers the flexibility to use materials that may be composted or otherwise incorporated into the soil is in line with the regulation, and any steps the NOSB and NOP can take to improve not only the natural resources of organic operations, but also the world as a whole, should be taken.

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.*