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September 24, 2012

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2648-So, Ag Stop 0268  
Washington, DC 20250-0268

RE: Docket: AMS-NOP-12-0040  
NOSB Crops Sub-Committee - **Biodegradable Mulch Film Made from Bioplastics**

Dear Ms. Arsenault and National Organic Standards Board:

Oregon Tilth Certified Organic supports the inclusion of biodegradable mulch film made from bioplastics to the National list. Although still defined as plastic, bioplastics are separate and distinct from traditional plastics.

Technological advances in plastics made from renewal carbons have dramatically increased over the last ten years. Over the same period of time the arsenal of tools available to organic farmers to control weeds has remained static. Weed pressure remains the number one challenge for many organic crop producers and additional tools are sorely needed.

We agree with the Crops Subcommittee on the importance and need of a clear definition of what constitutes biodegradable biobased bioplastic. Further, the distinction that separates biodegradable biobased bioplastic mulch from traditional plastic mulch must be discernable producer and verifiable by the certifier.

Respectfully submitted,

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*Oregon Tilth, Inc. is a non-profit 501(c)(3) organization that supports and promotes biologically sound and socially equitable agriculture. Oregon Tilth offers educational events throughout the state of Oregon, and provides organic certification services to organic growers, processors, and handlers internationally. An NOP accredited certifier since 2002, Oregon Tilth currently certifies over 650 farms and ranches and over 600 handlers in more than 35 states affording us a broad perspective of current practices and challenges faced by organic producers and handlers.*