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October 4, 2018

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

Re: Docket Number: AMS-NOP-18-0029
Crops Subcommittee Discussion Document: Paper Planting Pots

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. The Accredited Certifiers Association (ACA) is a nonprofit educational organization, and our membership includes 54 USDA Accredited Certification Agents and over 90% of US based certifiers accredited by the USDA.

In May and June of 2018, the ACA conducted a survey of our members related to the use of paper pots for planting. This was in response to increased ACA conversation on the topic after the NOP clarified in spring of 2018 that, although certain paper materials can be used as mulch or compost feedstock (as outlined on the National List at 205.601), paper is not an allowed material for use as or in a pot that would be used for transplanting, etc. *Please note: Our survey related strictly to paper materials, and not to paper chain pot systems or additional materials that might be contained in them.* Respondents were asked to select their organization's level of support for the following addition to the National List.

Section 205.601(o) production aids. Suggestion to add (ii) Plant pot or growing medium - newspaper and other recycled paper, without glossy or colored inks.

It should be noted that the wording of our survey question varies slightly from the wording of the proposal that ended up being submitted. We received responses from twenty certification agencies. Ninety percent supported or strongly supported the amendment. Although the language used in the survey varies from the language of the NOSB proposal, overall responses indicate support for allowance of paper as a plant pot. Respondents noted that allowing this use of paper was similar to use as a mulch or compost feedstock in terms of environmental effects and that paper is an appropriate alternative to plastic transplanting units.

Respondents also noted that expanding the use of paper in this way could be confusing because people might mistakenly think the listing is for specific paper pot products (which often contain glues or other additives) as opposed to simply paper. This distinction should be made clear.

The ACA also requests that the deadline for discontinuing the allowance of paper pots (ones that have already been approved and contain no additional prohibited substances) be extended beyond the 2018 growing season as the petition process plays out.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jennifer Cruse".

Jennifer Cruse
ACA Coordinator