



**Accredited Certifiers Association**  
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April 4, 2019

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-18-0071  
Crops Subcommittee Discussion Document: Paper (Plant pots and other crop production aids)

Dear Ms. Arsenault:

Thank you for the opportunity to provide comments to the National Organic Standards Board (NOSB) Crops Subcommittee (CS) on the most recent Strengthening the Organic Seed Guidance Proposal. The Accredited Certifiers Association (ACA) is a nonprofit educational organization, and our membership includes 58 certification agencies that are accredited by the USDA or in the process of becoming accredited.

We appreciate the CS's work on paper pots and other paper crop production aids. Many certifier members had been allowing paper pots prior to NOP clarification that the use of paper pots was not permitted under current listings of paper on the National List, and many are continuing to allow paper pots based on the NOP's extended use-up deadline for this material.

The petitioned annotation for paper pots reads, "Plant pot or growing container-hemp or other paper, without glossy or colored inks." The ACA supports the allowance of both recycled and virgin paper in this proposed annotation. If additives, such as synthetic fibers, are a concern, then allowing virgin sources may offer better control over what additives the paper contains.

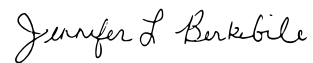
The ACA supports the CS's request for a technical review of the synthetic fibers used in paper-based pots, seed tape, collars, and hot caps. Other ingredients commonly found in paper products, such as glues, have been identified by some certifiers in already approved paper compost feedstocks and mulch, and they were included in previous technical reports on paper. More information is needed, however, on synthetic fibers used in paper products. We encourage the subcommittee to request and consider information on whether the breakdown and consumption of these synthetic fibers by naturally occurring soil organisms meet American

Society for Testing and Materials (ASTM) standards. This standard was considered during the initial NOSB review and approval of biodegradable biobased mulch film and may be relevant to paper pots as well.

The ACA supports the ultimate allowance of paper pots but agrees that the allowance of synthetic fibers within paper pots should be carefully considered.

We appreciate the NOSB's work on this topic and look forward to future dialog.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jennifer L. Berkebile".

Jen Berkebile  
ACA Materials Working Group Co-Facilitator