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PO Box 85 Mabel, MN 55954
(844) 783-7974
www.accreditedcertifiers.org

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

April 3, 2020

Re: Docket #AMS-NOP-19-0095
Crops Subcommittee Proposal: 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) regarding the proposal on Paper (Plant pots and other crop production aids). The Accredited Certifiers Association (ACA) is a 501(c)(3) nonprofit educational organization created to benefit the organic certifier community and the organic industry. The ACA strives for consistency in organic certification to uphold organic integrity, maintain stakeholder trust, and grow the organic industry. Our membership includes 60 certification agencies that are accredited by the USDA or in the process of becoming accredited; this includes all USDA accredited certifiers based in the USA.

We appreciate the Crop Subcommittee'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. The subcommittee is proposing to add a definition of Paper-based crop planting aid at §205.2 and a listing for Paper-based crop planting aids at §205.601(o). The ACA supports the proposal for the allowance of paper-based crop planting aids but has concerns and questions that we would like to see addressed.

The proposed definition of Paper-based crop planting aid at §205.2 is:

A material that is comprised primarily of cellulose-based paper, including pots, seed tape, and collars that are placed in or on the soil and are intended to degrade into the soil. Contains no less than 85% biobased content with biobased content determined using ASTM D6866 (incorporated by reference; see §205.3).

The ACA requests clarification on this definition. It is our understanding that cellulose is one biobased component of a paper-based crop planting aid, and that other biobased components could include reinforcement fiber, for example. Is the intent of this definition to communicate the



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requirement that the paper-based crop planting aid as a whole contains no less than 85% biobased content, which could include cellulose or other biobased components? In this case, certifiers and material review organizations may only verify biobased content, determined using ASTM D6866. If so, the ACA suggests the following minor revision (in blue):

Paper-based crop planting aid. A material comprised primarily of cellulose-based paper, including pots, seed tape, and collars that are placed in or on the soil and are intended to degrade into the soil. **Primarily cellulose-based crop planting aids** contains no less than 85% biobased content with biobased content determined using ASTM D6866 (incorporated by reference; see §205.3).

Or is the intent of the definition to communicate that certifiers should verify both that a paper-based crop planting aid is composed primarily of cellulose-based paper *and* contains no less than 85% biobased content? If so, the ACA requests further clarification on “primarily cellulose-based paper.” In addition, the ACA requests that the subcommittee consider whether it is necessary to verify both cellulose and biobased content.

In addition, the ACA requests clarification on the standard of identity of “cellulose” in this definition. Does the term “cellulose” include modified forms of cellulose? For example, viscose is a modified cellulose - would a material made primarily of viscose-based paper, and meeting the 85% biobased content requirement, meet the definition of a paper-based crop planting aid?

Finally, ACA members expressed concern about requiring no less than 85% biobased content as determined using ASTM D6866 for all paper-based crop production aids. This level of biobased content may exclude many products on the market. It is our understanding that the level was chosen to allow for currently used paper pots, but the ACA reached out to one paper pots manufacturer who is not yet sure if his products will meet this requirement. In addition, it is not just paper pots but also seed tapes, collars, and other paper-based crop planting aids that will be required to be 85% biobased content, which may inadvertently exclude these types of products. Finally, even if other paper-based crop production aids do meet the minimum level of biobased content, manufacturers, especially of seed tape and collars, may not be willing to pay for ASTM testing.

The ACA agrees that certifiers and material review organizations would request ASTM D6866 test results from manufacturers of paper-based crop planting aids; it is unlikely that we would have the resources to do these tests ourselves. The ACA could not reach consensus on verification of some additional proposed requirements at §205.601(o). The proposed listing reads:



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Production Aids: Paper-based crop planting aids as defined in §205.2. Virgin or recycled paper without colored or glossy inks. If these paper-based crop planting aids are commercially available with 100% biobased fiber content, these must be used.

The ACA has not reached agreement on our requirements for the commercial availability part of this annotation. ACA members have agreed to work together to develop common requirements, should this listing be added to the National List.

In summary, we support the allowance of paper-based crop planting aids including pots, collars and seed tapes, with guidance on certifier verification. We appreciate the NOSB's work on this topic.

Sincerely,

Jen Berkebile
ACA Materials Working Group Co-Facilitator