



April 4, 2019

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National Organic Standards Board  
USDA-AMS-NOP  
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Washington, DC 20250-0268

Submitted via [www.regulations.gov](http://www.regulations.gov)

**RE: Document # AMS-NOP-18-0071**

**[NOSB Crops Subcommittee Discussion on Paper \(Plant pots and other crop production aids\)](#)**

Dear NOSB members:

Thank you for the opportunity to provide comments on the Discussion on Paper (Plant pots and other crop production aids). MOSA certifies approximately 2150 organic operations throughout the United States, including about 500 vegetable and transplant growers. Many of these certified operations use paper production aids and would be negatively impacted by a requirement to discontinue use in organic production.

MOSA supports the addition of *“Plant pot or growing container made from hemp paper or other paper, without glossy or colored inks”* (or similar language) to the National List as a crop production aid. We appreciate the NOP withdrawal of the phase-out requirement which allows business to continue as usual while the details are coming together.

We also support the NOSB’s expansion of the paper production aid category to include other applications of paper beyond paper pots. We support the general listing of paper as a crop production aid, rather than individually listing specific uses. If any particular ingredients or processing methods are of concern, perhaps those could be spelled out in annotation language.

MOSA only became aware of synthetic fibers used in paper processing during this discussion process. We are interested to hear the results of the Technical Review and final recommendation from the NOSB. We have heard from manufacturers that strength is an important consideration for plant pots, and we are also aware there has been some discussion of natural fibers replacing synthetic fibers. We encourage full disclosure and discussion of all fibers used in production of paper plant production aids. Again, we support the allowance of paper pots and other paper crop production aids, but we agree that synthetic fibers within paper pots or other products should be specifically considered.

Thank you for your work on this topic. We are available to answer your questions.

Respectfully submitted,

The MOSA Certification Team