



April 5, 2021

Ms. Michelle Arsenault, Advisory Committee Specialist  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Ave., SW.,  
Room 2642-S., Mail Stop 0268  
Washington, DC 20250-0268

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

**RE: Docket #AMS-NOP-20-0089**

**NOSB Crops Subcommittee [Proposal: Paper-Based Crop Planting aid - petitioned](#)**

Dear NOSB Members:

Thank you for the opportunity to provide comments on the Proposal for Paper-Based Crop Planting Aids. MOSA certifies approximately 2,100 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 paper use in organic production. We appreciate your continued effort to reach a practical recommendation for an addition to the National List.

MOSA continues to support the addition of paper pots and other paper crop production aids, and we encourage you to pass this proposal at this meeting. However, the motion should be to list paper-based planting aids at §205.601(o) As production aids. This action creates the need for a (i) and a (ii). We also have one remaining question noted below.

It's important to understand the intention with the change from production aid to planting aid --- to limit the use of this paper to that planting period in the crop's production, meaning NOT something that would be used later in the crop's production cycle. The addition of soil incorporation makes it clear that this addition does not include materials that would be removed from the soil. Having this understanding is important to ensure that we can implement the rule as written. Paper transplant pots can definitely be looked at as a planting aid for the crop, though could be viewed as a crop production aid for the transplants, so it's important to have clear context.

Our question is regarding the last sentence of the definition. We would like to fully understand the intention.

*Added nutrients must comply with §205.105, 205.203, and 205.206.*

Added nutrients that we would find compliant are those in compliance with §205.601(j), plant or soil amendments, which is called out earlier in the proposed definition. Though we don't think either reference is necessary, we understand the reference to §205.105, which impacts other standards, and we understand the reference to §205.203, the soil fertility and crop nutrient management practice standard. However, the reference to §205.206 would apply to pest, weed, and disease management practices, and would NOT seem to apply to added nutrients. This standard could apply to some of the different types of products being used. A paper-based planting aid for pest control would need to comply with §205.206(e). To reflect our understanding, we recommend striking the last sentence of the definition entirely, or at least revising the sentence with the following technical revision.

*Added nutrients must comply with §205.105 and §205.203. Materials used for pest control, disease or weed control must comply with §205.206(e).*

We encourage product manufacturers to obtain ASTM D6866 testing and be prepared to submit full composition verification in preparation of a swift rulemaking process. We would prefer seeing manufacturers become listed by a Material Review Organization, such as OMRI. Although we are confident in our ability to evaluate products to the proposed criteria, product approval by an organization like OMRI ensures consistent decisions between certifiers and eliminates the need for manufacturers to provide multiple individual certifiers with the same information.

Though it has taken a lot of discussion and consideration to get to a final proposal that seems as if it will work, we really appreciate the work on this topic. Thank you for your commitment to seeing this decision through. Our certified organic growers thank you too.

Respectfully submitted,

The MOSA Certification Team