



CCOF

Advancing organic agriculture through certification, education, advocacy, and promotion.

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

Docket: AMS-NOP-18-0029-0001

Re: Crops Subcommittee: Paper pots – petitioned discussion document

October 4, 2018

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Crops Subcommittee's discussion document "Paper pots - petitioned."

CCOF is a nonprofit organization governed by the people who grow and make our food. Founded in California more than 40 years ago, today our roots span the breadth of North America. We are supported by an organic family of farmers, ranchers, processors, retailers, consumers, and policymakers. Together, we work to advance organic agriculture for a healthy world.

CCOF does not have a position on the petition for paper pots but encourages NOSB to expand the scope of the petition to include other paper-based seeding and transplanting aids. NOSB should review paper-based seeding and transplanting aids under a unified listing on the National List of Allowed and Prohibited Substances. Growers in California are looking at novel paper-based technologies to improve efficiency as regulatory costs rise and skilled labor is more difficult to source. Expanding the petition from paper pots to "planting aids" or "seeding and transplanting aids" would establish common requirements for paper-based products and streamline their review for NOSB.

Thank you for your review of our comments. Please do not hesitate to contact me for further information.

Sincerely,

A handwritten signature in black ink that reads "Peter Nell".

Peter Nell
Policy Specialist

cc: Cathy Calfo, Executive Director/CEO
Kelly Damewood, Director of Policy and Government Affairs
Jake Lewin, President, CCOF Certification Services, LLC