



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-18-0071-0001

Re: Crops Subcommittee Discussion Document: Paper (Plant Pots and Other Crop Production Aids) – petitioned

April 4, 2019

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Crops Subcommittee’s discussion document “Paper (Plant pots and other crop production aids) – 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 supports NOSB’s request for a technical review of the synthetic fibers and glue used in paper-based pots, seed tape, collars, hot caps, and other planting aids. CCOF also supports NOSB’s expansion of the petition from only paper pots to plant pots and other crop production planting aids. Expanding the petition from only paper pots to also include other crop production planting aids will 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
Government Affairs Manager

cc: Kelly Damewood, CEO

Jody Biergiel Colclough, Interim Chief Certification Officer, CCOF Certification Services, LLC