



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-19-0095

Re: Crops Subcommittee: Paper-Based Crop Planting Aids – Petitioned; Wild, Native Fish for Liquid Fish Products Discussion Document; Biodegradable Biobased Mulch Film Discussion Document

April 3, 2020

Dear Ms. Arsenault and NOSB:

Thank you for the opportunity to comment on the petition for paper based crop planting aids and the discussion documents on wild, native fish for liquid fish products and biodegradable biobased mulch film.

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 certifies over 2,600 organic farms across North America. Attached are our comments on the Crops Subcommittee's discussion documents and the petition on paper based crop planting aids.

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
Special Assistant to the CEO

cc: Kelly Damewood, CEO, CCOF, Inc.
April Crittenden, Chief Certification Officer, CCOF Certification Services, LLC
Rebekah Weber, Policy Director, CCOF, Inc.

CCOF's Comments on the Crops Subcommittee's Petitioned Material Proposal Paper-based Crop Planting Aids

CCOF supports the expanded proposed definition of paper-based crop planting aids under § 205.2 and a broader listing under § 205.601(o). Prior to 2018, CCOF did not allow the use of paper chain pots. However, after the NOP announced the allowance of these systems while NOSB completed their review, CCOF has allowed the use of paper chain pots in organic crop production. Currently 9 CCOF members use paper-chain pots as listed under the temporary allowance.

The expanded definition and listing will allow other novel paper-based technologies that improve efficiency and establish common requirements for paper-based products to streamline their review. These systems are important as regulatory costs rise and skilled labor is more difficult to source.

CCOF's Comments on the Crops Subcommittee's Discussion Document Wild, Native Fish for Liquid Fish Products

1,166 CCOF members list liquid fish products in their OSPs. CCOF supports the goal of protecting marine species, including fish and marine materials, and supports nonduplicative and achievable standards for organic producers, organic material manufacturers, and others in the organic supply chain.

CCOF appreciates the NOSB for taking the time to consider the impacts of nonsynthetic inputs. These materials are not given the same attention synthetic materials are given as they go through the Sunset Review process. However, due to the Technical Report's indication that no species of wild, native fish are harvested exclusively for use in liquid fish products, the question remains on whether the organic standards are the appropriate conduit for this work.

Some CCOF members ferment fish byproducts purchased from local fisherman to create their own fertilizers or divert similar wastestreams into fertilizer. However these examples may not serve as scalable solutions for other operations.

CCOF's Comments on the Crops Subcommittee's Discussion Document Biodegradable Biobased Mulch Film

CCOF supports the continued work on biodegradable biobased mulch film for organic crop production. Overall CCOF supports the reduction of plastic use in organic crop production and biodegradable biobased mulch film could be a useful option for producers should a manufacturer be able to create a commercially available product that complies with the regulations.

CCOF also supports measures to include the recycling of materials in the organic standards. Recycling materials is a missing component within the standards and can be tied in with natural resources requirements. Mulch films could be reviewed through the lens of natural resources protection when examining secondary residues and the impacts of the synthetics used in creating mulch films to soil and crops.

Additionally, if mulch films are developed to include nutrients or pesticides, they must be compliant with the relevant organic standards. Currently there are no commercially available mulch films that meet the regulation so it would be a significant jump forward for a product to include pesticides or nutrients. However, their development may be forthcoming when a commercially available mulch film is available.

Including an annotation regarding different soils and climates will be a complex process that may be too specific and lengthy for the standards. Certifiers, inspectors, and producers should be responsible for determining the biodegradability of mulch films depending on their site-specific conditions, including soil type and climate. The producer would know if the mulch film was breaking down in their soil and inspectors would be able to verify this during annual inspections.