

**National Organic Standards Board**  
**Crops Subcommittee Petitioned Material Discussion Document**  
**Paper Planting Pots**  
**August 21, 2018**

**Summary of [Petition for Paper Planting Pots](#)**

The NOSB received a petition in August 2018 for the addition of paper planting pots to the National List: **§205.601(o) production aids- Plant pot or growing container-hemp or other paper, without glossy or colored inks.**

This material has not been petitioned for inclusion on the national list in the past. However, it has been historically allowed for the past 12 years by some organic certification agencies, under the allowance for “Newspaper or Other Recycled Paper as a mulch or compost feedstock”. There have been three technical reports (TRs) for Newspaper, in [1995](#), [2006](#) and [2017, which can be found here: <https://www.ams.usda.gov/rules-regulations/organic/national-list/n>](#). [NOP guidance 5034-1](#) “Materials for Organic Crop Production” from December 2016 excludes virgin paper from the “newspaper or other recycled paper” allowance for mulch or compost feed stocks. The guidance states: *“Includes newspaper and other recycled paper such as cardboard, without glossy or colored inks. Does not include paper that is not recycled (i.e., virgin paper).”*

In February 2018, the NOP notified all certifiers that paper chain transplanting pots are not allowed in organic systems. However, because some certifiers had previously approved their use, NOP allowed a phase-out period until the end of the 2018 crop season. The NOP’s decision on this material was based primarily on the presence of an unapproved synthetic in the product. Further, the current allowance for paper on the National List does not extend to the use associated with paper pots.

Paper pots are used by small scale farming operations to efficiently transplant using a non-motorized machine transplanting system. More information on this transplanting method can be found on these websites: <http://paper-pot.com/> and <http://www.smallfarmworks.com/>. This equipment, along with the paper pots, is imported from a manufacturer in Japan. According to the petition, the Nitten paper pot chain system uses paper, produced from a non-bleached kraft pulp, and adhesives. There have also been synthetic fibers in small quantities in the paper pots, but these fibers are now being replaced by a natural hemp fiber. The petitioner and public comment at the Spring 2018 NOSB meeting stated this system is unique and necessary. The only alternative would be the much slower and more costly method of hand planting individual plants. The system is used for closely spaced crops such as onions, beets, baby salad, etc. The petition states that similar to newspaper, these pots decompose in the soil over time.

The petition states the TR on newspaper addresses the presence of adhesives in recycled newspaper as well. The three adhesives in the Nitten paper chain pots are vinyl-acetate resin (water soluble and stated to be leached from the pots before transplanting), ethylene-vinyl-acetate resin and acrylic acid ester copolymer. In addition, the petition states that in the manufacture of the paper, magnesium chloride and urea are used.

The Crops Subcommittee is considering a technical review request covering a variety of manufacturing processes for paper pots as a generic material.

**Questions:**

1. Is this material needed by organic producers, and why?
2. Are there alternatives to this material?
3. Are there risks to the environment or human health resulting from the use of this material?

**Vote in Crops Subcommittee**

Motion to accept the paper planting pots petitioned material discussion document

Motion by: Harriet Behar

Seconded by: Jesse Buie

Yes: 7 No: 0 Abstain: 0 Absent: 1 Recuse: 0

**Approved by Steve Ela, Subcommittee Chair, to transmit to NOSB, August 21, 2018**