

**National Organic Standards Board**  
**Crops Subcommittee Petitioned Material Discussion Document**  
**Paper (Plant Pots and Other Crop Production Aids)**  
**February 19, 2019**

**I 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 historically been 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).”*

Paper pots are used by small scale farming operations to efficiently transplant using a non-motorized machine transplanting system, or are planted individually to avoid removing plants from plastic pots at transplanting. Research on paper-based planting pots has brought to our attention the significant use of synthetic fibers in addition to the cellulose-based fibers used in newspaper. A variety of synthetic fibers, from vinylon, rayon, and polyester, as well as others we may not know of, are used in current “paper pots” on the market in amounts ranging from 15%-100% in We have been told that a research is being conducted on the use of natural hemp fibers to replace the synthetic ones. Hemp fiber is becoming more available in the marketplace and could offer the strength found in synthetic fibers, but the current supply is somewhat erratic. In Fall 2018, there were numerous public comments that requested that the allowance for paper be expanded to include a variety of production aids.

Many of the adhesives and fibers typically used in paper have been described and reviewed in the technical review on newspaper. However, the use of synthetic fibers was not covered in sufficient detail, and therefore the Crops Subcommittee has requested a technical review (TR) of the synthetic fibers used in paper-based pots, seed tape, collars, and hot caps. The TR scope for paper-based crop production aids is to include: the types of synthetic fibers used, the percentage of the synthetic fiber that biodegrades and in what time frame, as well as the standard OFPA criteria for a material used in organic production.

**II Questions:**

1. Are there other paper-based production aids that are not mentioned in this discussion document beyond mulch, compost feedstock, pots, seed tape, hot caps, or collars?
2. What synthetic fibers are used in paper-based crop production aids, what is the percentage of synthetic fiber in the paper-based product, and how long, if at all, does it take for the synthetic fiber to completely biodegrade?

3. Are the synthetic fibers used in paper as a crop production aid, also used in newspaper or recycled paper that is currently allowed on the National List?

### **III Vote in Crops Subcommittee**

Motion to accept the paper (plant pots and other crop production aids) discussion document

Motion by: Harriet Behar

Seconded by: Rick Greenwood

Yes: 6 No: 0 Abstain: 0 Absent: 2 Recuse: 0

**Approved by Jesse Buie, Subcommittee Vice Chair, to transmit to NOSB, February 19, 2019**