

**Formal Recommendation by the  
National Organic Standards Board (NOSB)  
to the National Organic Program (NOP)**

**Date:** April 29, 2011

**Subject:** Sunset 2012: 205.601(b) (2) (ii) Plastic mulch and covers (petroleum-based other than PVC).

**Chair:** Tracy Miedema

**The NOSB hereby recommends to the NOP the following:**

Rulemaking Action        X  
Guidance Statement  
Other

**Statement of the Recommendation (Including Recount of Vote):**

The Board recommends the relisting of Plastic mulch and covers (petroleum-based other than PVC) as a synthetic substance allowed for use in organic crop production in 205.601(b)(2)(ii).

**Rationale Supporting Recommendation (including consistency with OFPA and NOP):**

The requested TR was not available for the guidance of the Crops committee in arriving at its recommendation.

OFPA Section 6508(c) (2) prohibits the use of plastic mulches, unless such mulches are removed at the end of the each growing season or harvest season.

Several commenters expressed interest in the use of biodegradable plastics and /or not removing plastic at the end of each season. One commenter questioned the need to list plastics at all suggesting they are "tools". These comments seem to be beyond the scope of this decision.

Because of its long use in organic production and minimal known adverse effects, continued listing is believed to be acceptable at this time.

**NOSB Vote:**

<b>Moved:</b> JFo		<b>Second:</b> BF		
<b>Yes:</b> 14	<b>No:</b> 0	<b>Abstain:</b> 0	<b>Absent:</b> 0	<b>Recusal:</b> 0

**National Organic Standards Board  
Crops Committee  
Sunset 2012 Proposed Recommendations  
Plastic Mulch**

**April 29, 2011**

**List § 205.601 Synthetic substances allowed for use in organic crop production**

- (b) As herbicides, weed barriers, as applicable
  - (2) Mulches
    - (ii) Plastic mulch and covers (petroleum based other than PVC)

**Committee Summary**

OFPA Section 6508 prohibits the “use plastics mulches, unless such mulches are removed at the end of each growing or harvest season ..” The Crops Committee requested a technical report for this use and thus new information might result in the revision of this recommendation. Biodegradable plastic is apparently available and might be an alternative for some applications. Because of the long use as a substitute for herbicides and other benefits to growers and the belief that adverse effects are minimal, the CC believes continued use is acceptable.

**Committee Recommendation**

Relist plastic mulches and covers on § 205.601(b)(2)(ii).

**Committee Vote**

Motion by: Barry Flamm    Second: John Foster  
Yes: 6            No: 0            Absent: 1            Abstain: 0            Recuse: 0