

## **Planting Stock for Perennial Crops Grown as Annual Crops**

The NOSB Crops Committee submits this recommendation to the NOP to clarify Section 205.204, the seeds and planting stock practice standard, in the USDA organic standard for clarification to growers and certifiers in reference to Section 205.204 of the final rule.

There are a number of plants crops such as raspberries and strawberries that are perennial crops grown from planting stock rather than true seed. In some farming operations, these crops may be grown as annuals rather than perennials where new planting stock is used each year to produce one harvest season of an organic crop.

The Crops Committee recommends that in these systems, the planting stock would be considered an annual planting stock and comply with the requirements of the rule as it pertains to seeds and planting stock in Section 205.204(1) and 205.204(2), rather than those for perennial planting stock that is addressed in Section 205.204(4). For annual production, Section 205.204(1) and 205.204(2) addressing annual production states that nonorganically produced planting stock, whether untreated or treated with a substance on the National List, may be used to produce an organic crop when an equivalent organically produced variety is not commercially available. Organic seed or planting stock is required for these crops unless an equivalent organically produced variety is not commercially available. Growers who do not grow these crops as annual planting stock as defined in the rule as "a plant grown from seed that will complete its life cycle or produce a harvestable yield within the same crop year or season in which it was planted", would be required to comply with the planting stock requirements for perennial crops presented in Section 205.204(4).