

James Felizola

Re: Paper Planting Pots
First, I think that in general, natural paper planting pots have amazing potential. Strongly advise changing: Up to 40% of the ingredients can be non-synthetic, other permitted synthetic ingredients at §205.601(j), or synthetic strengthening fibers, adhesives, or resins. To: Up to 40% of the ingredients can be non-synthetic, or permitted synthetic ingredients at §205.601(j), without synthetic strengthening fibers, adhesives, or resins. To just up and allow synthetic strengthening fibers, synthetic adhesives, and synthetic resins, just because this toxic crap is used in the most current, commodity sourced paper planting pots is very flawed logic, and to justify it as a labor saving measure is sad, because labor could also be saved with the use of paper planting pots without synthetic strengthening fibers, adhesives, or resins. For example those simply made from recycled paper only. To weaken the USDA/NOP Rule because current, commodity sourced commercial suppliers of most paper planting pots do not currently offer a less toxic alternative sets a dangerous precedent. We need to maintain high standards that drive innovations, and not adopt weak standards which discourage it. Synthetic fibers are a disgusting and persistent synthetic soil additive, and the adhesives and resins could instead be derived from natural sources - one could dip 100% paper used for planting pots in raw and natural liquid rubber for a thin coat, etc. I have been and remain strongly opposed to such use of synthetic strengthening fibers, synthetic adhesives, or synthetic resins in paper planting pots used in organic crop production.