

Anonymous

I am Hidekazu Terasawa, director of the paper pots division for the Nippon Sugar Beet Manufacturing Company in Japan. Publicly, our company is known as Nitten. We are writing in support of the USDA proposed rule to allow paper pots to be used on certified organic farms in the U.S. We have been making paper pots to solve planting challenges for farmers since 1961. This began with paper pots for sugar beets and now extends to a wide range of paper pot products for many different crops. Our paper chain pots have been used on certified organic farms in the United States since 2006 through the work of our North American representative and importer, Small Farm Works. The paper chain pots that we manufacture meet the proposed standards in terms of ingredients and proportions: A minimum of 60% craft pulp paper, a minimum of 80% bio-based materials, and a maximum of 20% other (non-bio-based) ingredients. Once the proposed rule is made into law, we will proceed with a third-party review and verification through the Organic Materials Review institute. The paper chain pot system has been enthusiastically adopted by numerous small-scale farmers in the United States and elsewhere who believe in sustainable production practices. The paper chain pot system allows these producers to reduce or limit their use of plastics, fossil fuels, and land. The use of flimsy plastic trays that typically only last a few seasons is reduced. The paper chain pot transplanter is a non-motorized tool that does not use fossil fuels. Cultivation is reduced because the system allows growers to plant crops normally direct-seeded (for example: peas, beans, spinach, beets, corn, turnips, radishes, and carrots) thus allowing crops to get a head start on weeds. Paper chain pots allow growers to plant crops in tight rows with minimal in-row spacing, helping them to produce more per square foot or acre. Finally, the paper chain pot system saves time and labor costs. This helps small-scale sustainable and organic producers be more profitable, allowing them to remain in business and focus more effort on other aspects of their farming system. Thank you for developing the proposed rule which will allow paper chain pots to be used on certified organic farms.