

Anonymous

I am John Hendrickson, owner of Small Farm Works, a family business that sells paper pots in North America and the person who submitted the original petition to allow the use paper pots on certified organic farms in 2018. We also are the official North American importer and distributor of Nitten paper chain pots from Japan. I support the NOP proposed rule which will allow the use of paper-based planting aids, including paper pots, on certified organic farms. These materials are environmentally benign and incredibly beneficial, especially for small-scale organic farmers. They enhance productivity, efficiency and profitability while decreasing the use of disposable plastics and fossil fuels. More specifically, I support the proposed criteria regarding allowable ingredients and the proportion of those ingredients. Nitten, the manufacturer of the paper chain pots we import and sell has had third party testing done and their paper pots meet the proposed regulations. The materials the paper chain pots are made from are safe and inert and range in bio-based content from 83% to over 88%. We continue to work closely with Nitten to investigate and develop paper pots with even greater proportions of natural, bio-based materials and with faster decomposition rates. Small Farm Works looks forward to the proposed rule becoming law and working with Nitten and the Organic Materials Review Institute (OMRI) to verify that Nitten's paper pots meet the proposed rule. I also want to take time to thank the National Organic Standards Board for their work in carefully considering our petition and working through a complex set of issues to develop the proposed rule. Thanks also to the USDA National Organic Program staff for their effort during the process and for allowing organic farmers to continue to use paper chain pots while the petition review was in process.