



April 6, 2015

Ms. Michelle Arsenault, Special Assistant
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2648-So, Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-15-0002

RE: Crops Subcommittee – 2017 Sunset: Plastic mulch and covers (petroleum-based other than polyvinyl chloride (PVC): National Organic Standards Board members

The Biodegradable Products Institute (BPI) represents the major manufacturers of biodegradable films in the United States. The Biodegradable Products Institute (BPI) is a professional association of over 150 key individuals and groups from government, industry and academia, which promotes the use, and recovery of biodegradable materials.

BPI, in March 2012, submitted a petition to allow biodegradable mulch film made from bioplastics to be added to the National List for organic crop production. In 2014 a Final Rule was published by the National Organic Program (NOP) based on the discussion and decision of the Crops subcommittee and National Organic Standards Board (NOSB) to list biodegradable biobased mulch film as an allowed synthetic for use in organic crop production.

Strong grower support was a key reason that this petition was approved. Most of the farmer's comments focused on the superior handling and disposal characteristics of these materials. Little concern was expressed by the growers as to the petroleum vs biobased content. Moreover the petition disclosed that the mulch film contained both biobased and petroleum-based feedstocks, and this was confirmed in the Technical Evaluation Report (TER). The NOSB annotations also indicated that the biobased content needed to be identified, a procedure which would have been redundant if only 100% biobased feedstocks were allowed.

In January 2015, the NOP issued a policy memo that instructs certification agents and material review organizations to allow only biodegradable biobased mulch film that contains 100% biobased feedstock. This guidance document was issued by NOP with their knowledge that no commercially available products meet this 100% biobased requirement. Nor are any acceptable biodegradable products going to be available in the foreseeable future.

During the NOSB meetings, some of the participants wondered if current plastic mulches should be allowed to sunset in 2017, recognizing that biodegradable mulches could be viewed as a better alternative. At that time, NOSB's approval of biodegradable mulches was seen as the opportunity to allow organic growers to use these new materials and to determine for themselves if they were, in fact, a preferred alternative to non-degradable petroleum-based plastic mulches.

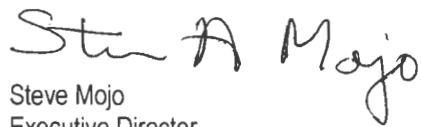
Plastic mulches are used widely across the world on farms and have numerous benefits, such as increase yields. Biodegradable mulch films have comparable performance of conventional mulches, but eliminate many of their drawbacks. Organic growers commented that conventional plastic mulches are labor intensive, as they must be removed at the end of the season and disposed of, taking soils with them. They also leave non-degradable plastic fragments, which will remain in the soils for long periods of time. Finally, disposal of these films (via landfill or incineration) can be costly. Biodegradable mulch films are an improvement on these conventional mulches, as they

overcome the issues of waste creation and disposal. At the end of the crop cycle, fully biodegradable mulch films are plowed back into the soil, where they are removed via biodegradation by soil microorganisms.

It should be recognized that no viable biodegradable plastic mulch alternatives to the current plastic mulches are available at this time. This is due to the NOSB's interpretation of the original petition and NOP's decision to limit biodegradable ag-mulches to only those that are 100% biobased. The decision prevents growers the option to use and evaluate biodegradable plastic mulches, which contain some biobased content and bring significant benefits to the organic growers. In their place, organic growers will have no choice but to continue to use non-degradable, plastic mulches, which are derived solely from petroleum.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Steve Mojo". The signature is written in a cursive, flowing style.

Steve Mojo
Executive Director