

**NOSB Resolution on paper pots
October 26, 2018**

The NOSB thanks the NOP for enforcing the National List and for its close review of this issue. Paper pots are not explicitly listed on the National List and therefore its usage as a production aid can be confusing. Different certifiers have viewed this differently, with decisions made in good faith, and with equally compelling perspectives. In the opinion of the NOSB, paper pots that may include virgin paper and adhesives, are used as a nursery production aid like many other types of pots. At the time of field planting, the paper should be considered used and therefore recycled since they have been used in the nursery. If this paper material is applied to the field it would be considered a recycled paper for use as mulch.

Based on comments received at the Fall 2018 NOSB meeting, we have heard universal support for this material in this application. The moratorium on usage will create a substantial financial burden on those growers who have used this system in good faith with the consent of their certifiers. We understand that the National List could be clearer in this regard and the NOSB is in the process of considering a petition on paper pots. **Therefore, be it resolved by unanimous vote, to ensure a full and timely review of paper pots we request the NOP allow the continued use of paper pots while this review and potential rulemaking proceed. We believe the interpretation offered in this resolution allows the program to take this path while maintaining fidelity to the existing regulations that the program is charged with protecting.**