



BEYOND PESTICIDES

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September 11, 2012

National Organic Standards Board
Fall 2012 Meeting
Providence, RI

Re. Biodegradable Biobased Bioplastic Mulch (Crops)

These comments are submitted on behalf of Beyond Pesticides. Beyond Pesticides, founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers and farmworkers, advances improved protections from pesticides and alternative pest management strategies that reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and groups around the world.

We support the recommendation of the Crops Subcommittee to list biodegradable biobased bioplastic mulches under specified conditions.

Plastic mulches are allowed by the *Organic Foods Production Act* only when removed at the end of the growing or harvest season. There were good reasons for this limitation —plastics, in general, are not good for the soil, and their removal allows beneficial soil organisms to recover from the stress put on them by the smothering and heating impacts of the plastic. Plastic also has impacts in the cradle-to-grave cycle that must be considered in the listing and use of synthetic materials. Finally, natural organic mulches add organic matter to the soil and feed soil organisms. As a weed suppressant, it is difficult to see how plastic can be justified when so many organic mulches are available, with beneficial soil impacts. Black plastic does have soil-warming properties that other mulches do not have, but the need for soil warming is not universal.

Biodegradable biobased bioplastic mulches seem to circumvent the problems of plastic mulches. We are concerned that the bioplastic mulches really be biodegradable to carbon dioxide and water before the next season and that they have minimal impacts in their manufacture. The criteria in the annotation seem to ensure that these conditions are met. This is an important opportunity —bioplastics are at a stage in their technological development where the creation of a good annotation can ensure that future development will be in a direction that results in products consistent with organic standards. There may not be many products that currently meet all of the criteria that the subcommittee has proposed, but NOSB

clarity in an annotation that meets OFPA criteria is the best way to ensure that there will be more such products in the future.

We are still concerned that the use of these mulches may substitute for organic mulches that help build the soil, and suggest that in the next sunset some limitation be considered. However, it does not make sense to impose those limitations on biodegradable biobased bioplastic mulches when they are not imposed on conventional plastic mulches. The next sunset review for conventional plastic mulch should consider the question of need in light of the availability of biodegradable biobased bioplastic mulches.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is fluid and cursive, with a long horizontal stroke at the end.

Terry Shistar, Ph.D.
Board of Directors