



Compost Regulation in the National Organic Standards

History and Implications

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Overview of the Federal Rule

- **Mandated by the 1990 Organic Foods Production Act (OFPA)**
- **First draft of national standards released in 1997**
- **Over 275,000 comments from public expressed outrage at radiation, GMOs, and sewage sludge being allowed**

Overview (continued)

- **Second draft released March 2000 using NRCS compost practice standard; another 40,000 comments submitted, including many on limitations of NRCS practice standard applied to farms**
- **Final draft released December 2000; to be fully implemented Oct. 2002**

“Compost” defined in the Rule

The product of a managed process through which microorganisms break down plant and animal materials into more available forms suitable for application to the soil. Compost must be produced through a process that combines plant and animal materials with an initial C:N ratio of between 25:1 and 40:1. Producers using an in-vessel or static aerated pile system must maintain the composting materials at a temperature between 131°F and 170° F for 3 days. Producers using a windrow system must maintain the composting materials at a temperature between 131°F and 170°F for 15 days, during which time, the materials must be turned a minimum of five times.

Compost Standard in the Rule

- ☛ **Integrates NRCS and EPA standards; reviewed by USDA-ARS**
- ☛ **§ 205.203 Soil fertility and crop nutrient management practice standard ...**
- ☛ **(c) The producer must manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances. Animal and plant materials include:**

Compost Standard (cont.)

- ☛ ... (2) Composted plant and animal materials produced through a process that
- ☛ (i) established an initial C:N ratio of between 25:1 and 40:1; and
- ☛ (ii) maintained a temperature of between 131 F and 170 F for 3 days using an in-vessel or static aerated pile system; or
- ☛ (iii) maintained a temperature of between 131F and 170F for 15 days using a windrow composting system, during which period, the materials must be turned a minimum of five times.

Industry and Grower Response

- **USCC: “overly restrictive”; takes issue with time-temperature requirements**
- **Growers: too expensive and time-consuming, especially for small scale farms**
- **Organic Trade Association: has issued alternative language**
- **Mushroom industry: mushroom composting doesn’t fit the definition**

The Compost Task Force

- Formed to make recommendations to the National Organic Standards Board
- Short-term response: will re-interpret “include” in 205.203 to mean “include but not limited to”; issue document describing approved compost practices to guide certifiers
- Long-term response: change in Rule language to include other composting methods such as vermicompost

The Need to Regulate Compost

- **According to USDA: Because manure has strict application restrictions, they must distinguish compost from manure**
- **My opinion: Unbased fear of microbes; capitulation to organic critics**

Industry Implications

- ✔ **Will have to follow the organic standards for compost production in order to sell for use on organic farms. Never use feedstocks that could have persistent herbicides or heavy metals.**
- ✔ **Consider listing product with Organic Materials Review Institute (OMRI)**
- ✔ **Guiding standard:** (e) The producer must not use: (1) Any fertilizer or composted plant and animal material that contains a synthetic substance not included on the National List of synthetic substances allowed for use in organic crop production;

Emerging Issues

- ✓ **Vermicompost: will likely be dealt with by Task Force**
- ✓ **Compost tea: language in final rule commentary indicates USDA wasn't inclined to allow it. Production methods must be carefully documented. USDA seeks more data on its use.**

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