Organic Policy Statement
Manure/Compost

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REQUIREMENTS FOR DOCUMENTATION OF COMPOST PRODUCTION AND PREHARVEST APPLICATION TIMING REQUIREMENT INTERVALS FOR MANURE USAGE ON CROPS FOR HUMAN CONSUMPTION.

Pertinent NOP rule sections:
§ 205.203 Soil fertility and crop nutrient management practice standard (205.203 (c)(1) and (c)(2); and
§ 205.103 Recordkeeping by certified operations.

Organic producers have limited choices on what products can be used to meet fertility needs for crop production under the National Organic Program (NOP) rule. Most producers use some form of compost or manure or a combination of both.

In order for the producer to comply with the NOP rule, a producer must be clear on two specific components:

1) What is the definition of compost under the NOP rule? and

2) What restrictions apply when applying raw manure to crops intended for human consumption.

The NOP rule states:

> (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:
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> (1) Raw animal manure, which must be composted unless it is:
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> (i) Applied to land used for a crop not intended for human consumption;
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> (ii) Incorporated into the soil not less than 120 days prior to the harvest of a product whose edible portion has direct contact with the soil surface or soil particles; or
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> (iii) Incorporated into the soil not less than 90 days prior to the harvest of a product whose edible portion does not have direct contact with the soil surface or soil particles;
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> (2) Composted plant and animal materials produced though a process that:
>
> (i) Established an initial C:N ratio of between 25:1 and 40:1; and
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> (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 131 °F and 170 °F for 15 days using a windrow composting system, during which period, the materials must be turned a minimum of five times.

Animal manure or plant material derived compost may be applied to any organic crop to meet fertility needs without meeting any preharvest application timing requirement. However, an organic producer cannot consider a manure based material “compost” unless it has met the above conditions. Some producers consider manure that has been piled for a year

or longer to be compost. This is not correct. If the material has not been **managed** to establish an initial C:N ratio of between 25:1 and 40:1; **and maintained** at a temperature of between 131 °F and 170 °F for 3 days using an in-vessel or static aerated pile system; **or maintained** a temperature of between 131 °F and 170 for 15 days using a windrow composting system, during which period, the materials were turned a minimum of five times it must be managed as raw manure for compliance with the NOP rule.

Manure products that have not met the above criteria for compost or producers who do not have documentation that the manure material meets the criteria regardless of whether it meets the criteria or not, must follow the preharvest manure application timing requirements when applying the product to crops for human consumption. Records documenting compost production methods must be maintained for both on-farm produced compost as well as for compost obtained from an outside source.

Compost tea is considered manure for the purposes of determining the preharvest application timing requirements unless the compost that was used as the source of the tea product met the above mentioned requirements and there were no additives to the product.

Records must be kept of the date the manure was incorporated into the soil and the actual or expected date of harvest. Note, the NOP rule specifically states the preharvest application timing requirement is from the date of incorporation until harvest. Therefore the preharvest interval clock starts on the day the manure is incorporated into the soil and not on the date the manure was spread on the field.

Other resources for information on composting:

Colorado State University's Rocky Mountain Compost School
http://www.rockymountaincompostschool.info/

Baldwin, K. R. and Greenfield, J.T. Composting on Organic Farms, http://www.cefs.ncsu.edu/PDFs/Organic%20Production%20-%20Composting.pdf

Diver, S. ATTRA. Farm-Scale Composting Resource List. http://www.attra.org/attra-pub/farmcompost.html

On-Farm Composting Handbook. Natural Resource, Agriculture, and Engineering Service.
http://www.css.cornell.edu/compost/OnFarmHandbook/onfarm_TOC.html

Disclaimer: This policy statement is provided as guidance to organic producers/handlers and is not to be used as a substitute for or in place of the National Organic Program rules.