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:

(1) Raw animal manure, which must be
composted unless it is:

(i) Applied to land used for a crop
not intended for human consumption;
(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

(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;

(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

(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.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.