

# FDA Food Safety Modernization Act

## OTA-WSDA Organic Producer Survey Results



## Biological Soil Amendments of Animal Origin

**Impact of FDA's Proposed Application Intervals on  
Organic Fertility and Crop Rotation Requirements**

# Impact of FDA's Proposed Application Intervals on Organic Fertility and Crop Rotation Requirements

## Background

In an effort to further inform the effects of the proposed application intervals would have on organic crop producers, the Organic Trade Association (OTA) and the Washington State Department of Agriculture (WSDA) conducted a survey of organic producers asking a number of questions related to the impact the FDA proposed produce safety rule would have on their organic fertility and crop rotation practices. The survey was circulated to organic producers via email and hardcopy (August 30 – October 4, 2014) and was limited to producers certified under the USDA organic regulations, and therefore legally subject to the requirements outlined in 7 CFR 205.205 (Crop rotation practice standard).

## Rate of survey response

The NOP website lists approximately 8,100 producers certified for crop production in the United States. This was considered the target population for the purposes of this survey, as organic crop producers are the group of farmers who may be subject to both the crop rotation requirements under USDA organic regulations as well as the application interval requirements outlined in FDA's proposed produce safety rule. The survey received 310 responses, which constitutes a response rate that provides a 95% confidence level with a confidence interval of 5.5%.

## Survey conclusions

94% of organic producer responses indicate the use of compost or manure as a soil fertility input with organic covered produce. The survey results indicate that FDA's proposed waiting periods between application and harvest for compost and untreated manure will restrict organic producers' ability to rotate crops as part of preventive pest and disease control and to comply with the established USDA Organic Regulations at 7 CFR 205.203, 205.205, and 205.206 (Soil Fertility and Crop Nutrient Management Practice Standard & Crop rotation practice standard; Crop Rotation Practice Standard; and Crop Pest, Weed, and Disease Management Practice Standard). Failure to implement crop rotation as part of a preventative pest management program will force organic producers out of compliance with current USDA Organic Regulations and prompt organic certifiers to pursue adverse action. Results also indicate that the majority of producers using compost obtain their compost from commercial sources.

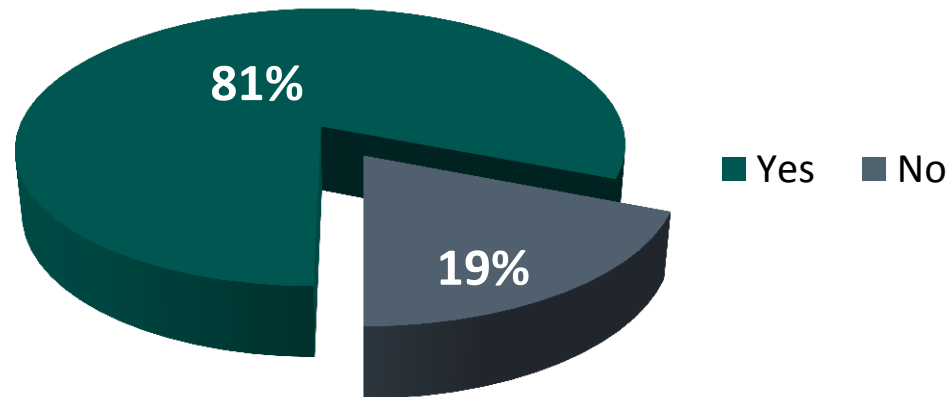


# Biological Soil Amendments

## Organic Producer Survey Results



**Does your operation grow any organic produce commonly consumed raw?**



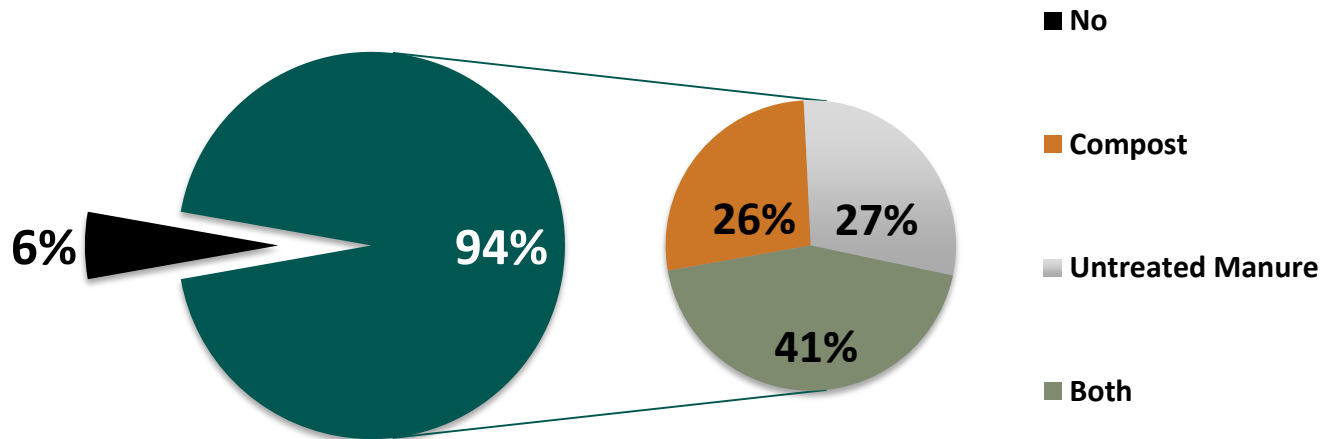


# Biological Soil Amendments

## Organic Producer Survey Results



Does your operation use either untreated manure or compost for soil fertility?



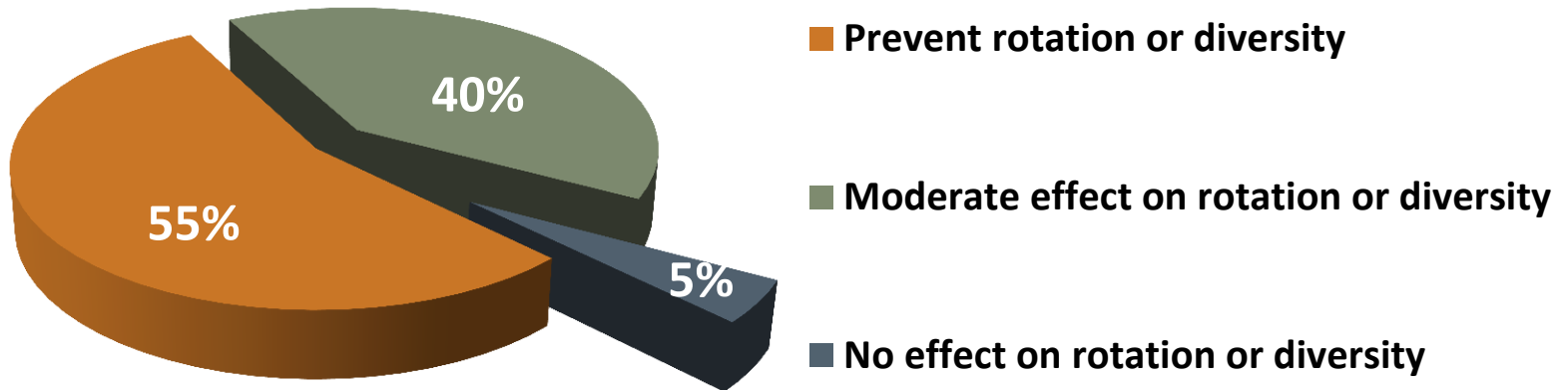


# Biological Soil Amendments

## Organic Producer Survey Results



**If a nine (9) month waiting period was required after applying untreated manure, how would this impact your operation's ability to rotate crops or introduce biological diversity?**



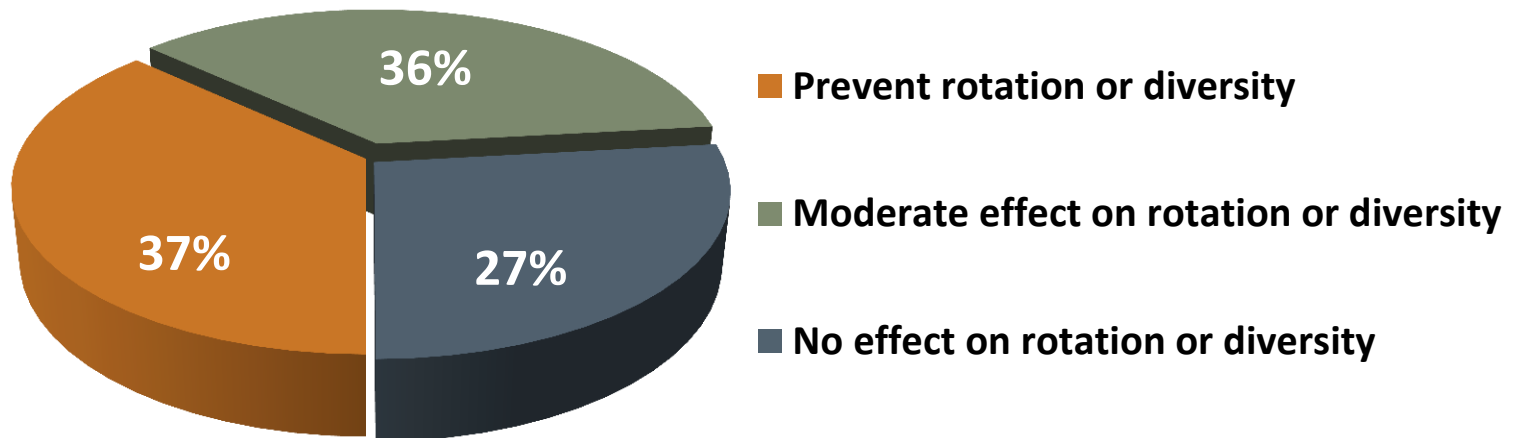


# Biological Soil Amendments

## Organic Producer Survey Results



**If a forty-five (45) day waiting period was required after applying compost, how would this impact your operation's ability to rotate crops or introduce biological diversity?**



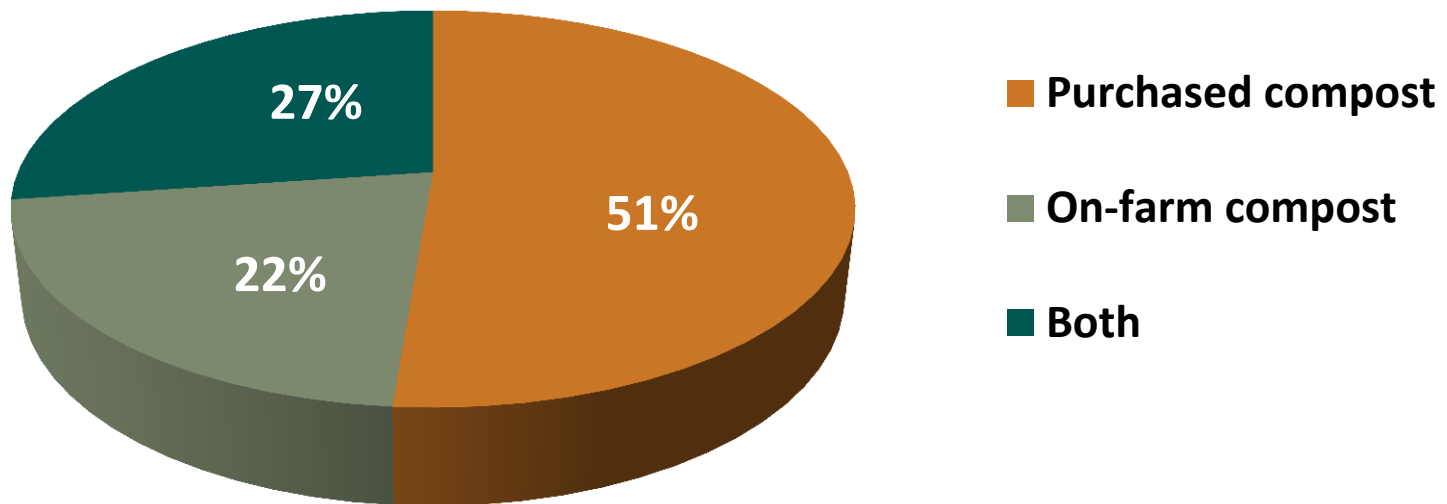


# Biological Soil Amendments

## Organic Producer Survey Results



**What are the sources of compost used on organic farms?**





# Biological Soil Amendments

## Organic Producer Survey Results



**310 responses received from 32 states**

**White: 0 | Green: 1-17 | Orange: 18-27 | Brown: 49+**

