



September 30, 2024

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP

**Docket:** AMS-NOP-24-0023

**RE: Crops Subcommittee  
Proposal: Compost**

Dear Ms. Arsenault:

Thank you for this opportunity to provide feedback to the Crops Subcommittee on its Compost proposal. The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, material input providers, and others. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

**OTA supports the Subcommittee's proposal to amend the practice standard**, removing the C:N ratio requirements and amending the language regarding time and temperature requirements. These appear to be widely supported. **OTA currently does not have a position on how the Subcommittee approaches the inclusion or exclusion of synthetic feedstocks in compost** and encourages the Board and organic community to think about how we can collectively move forward in a wider context.

As we find in many of our deliberations, we are challenged to address larger issues of sustainability when we constrict our conversations into silos. If we wish organic to be relevant in wider sustainability discussions, including those addressing environmental and human health challenges, we must look holistically at how we can do better. In this same agenda, the Board is proposing the top research priority for crops is "the extent and impact of plastic use in organic crop production, and how organic producers can lead in reducing it and aligning with consumer concerns." Organic—and conventional—production relies on tremendous amounts of nonbiodegradable, unrecyclable plastics. Organic has indicated a desire to move beyond this reliance by placing in the regulation an allowance for biodegradable biobased mulch, referencing some of the same or similar ASTM standards for degradability as proposed by a petition to USDA.

Yet to date, no commercially available mulches exist that meet this definition, and we see continued use of nonbiodegradable plastic mulches. While these are required to be removed from the field at the end of the growing or harvest season before they can degrade, weather, exposure and the practicalities of farm machinery and movement in the field see some of this degrade before it can be removed. While we may be uncomfortable with some biodegradable synthetics, we must ask to what degree are we comfortable with the continued use of nonbiodegradable plastics and synthetic microplastics that don't break down at all. Perfect solutions are rare, and tradeoff decisions must be made in the context of real-world challenges, not theoretical protocols. Synthetic contamination of farms can occur through various practical avenues, such as poorly maintained equipment, inadvertent water contamination, or inadvertent litter. Even with current composting standards, the physical removal of plastics from waste streams is unlikely to be



completely effective. We encourage the board to challenge itself to explore the relative sustainability of real world tradeoffs and the collective impact of not engaging in the efforts to reduce the reliance on plastics.

OTA appreciates the Board has committed to taking a deeper look at resin formulated and fiber-based products and encourages the Board to address biodegradable synthetics in compost with mindfulness to the need to address the use of these or similar substances in biodegradable biobased mulch.

On behalf of our members across the supply chain and the country, OTA thanks the National Organic Standards Board for the opportunity to comment, and for your commitment to furthering organic agriculture.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Scott Rice", is positioned below the text "Respectfully submitted,".

Scott Rice  
Sr. Director, Regulatory Affairs  
Organic Trade Association

cc: Tom Chapman  
Co-CEO  
Organic Trade Association