

April 3, 2024

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

Docket: AMS-NOP-23-0075

RE: Crops Subcommittee
Discussion Document: Compost

Dear Ms. Arsenault:

Thank you for this opportunity to provide feedback to the Crops Subcommittee on its Compost Discussion Document. 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 appreciates the Board's effort and intent to update the organic definitions and regulations regarding compost production and recognizes the significant task this presents in light of a myriad of considerations: updating the regulations to reflect the many composting processes currently in practice; the use of compost across a wide variety of cropping systems; food safety concerns regarding the use of compost from animal origin; the Biodegradable Product Institute's petition to USDA to change the definition of compost and add a definition of "compost feedstock;" and the inclusion of mushroom-specific requirements of compost production in UDA's recent proposed rule on mushroom production.

OTA looks forward to engaging our membership in earnest on this issue. In light of these complex considerations and a relatively brief period in which to comment, we were unable to convene any discussions prior to the April 3 comment deadline. In support of developing comments to inform the Board on this topic so central to organic production, we intend to tap into our diverse membership in the coming months to provide insight on the nine technical topic areas queried by the Board. We will then collate these comments for submission when the fall meeting docket opens for consideration by the Board. In the interim, we look forward to the compost panel's insights and the Board's conversations at its upcoming meeting in Milwaukee.

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,



Scott Rice
Regulatory Director
Organic Trade Association

cc: Tom Chapman
Co-CEO
Organic Trade Association