



April 28, 2025

Ms. Michelle Arsenault, Advisory Committee Specialist  
National Organic Standards Board  
USDA-AMS-NOP

Submitted via [Regulations.gov](https://www.regulations.gov).

RE: Docket #AMS-NOP-24-0081-0001

**NOSB Crops Subcommittee [Proposal on Compost Production for Organic Agriculture](#) and [Discussion Document on Synthetic Compostable Polymers](#)**

Dear NOSB Members:

Thank you for the opportunity to provide comments on the 2025 Crops Subcommittee's proposal and discussion document concerning synthetic compostable polymers. MOSA certifies over 1,735 organic operations throughout the United States, including approximately 620 livestock operations, 1,355 crop operations, and 345 handling operations. Hundreds of MOSA certified operations use compost, and hundreds more use inputs that include compost as an ingredient. We recognize that compost is a fundamental component of organic agriculture and we appreciate the NOSB's close consideration of synthetic feedstocks that may be used in its production.

We support the Spring 2025 Proposal affirming that synthetic compost feedstocks must be evaluated by the NOSB, recommended for addition to the National List by a two-thirds vote of the NOSB, and added to the National List through the Federal Register process of notice and comment rulemaking by the NOP. This process has been fundamental to the organic industry since its inception, and synthetic compost feedstocks should be considered in line with how other materials have been considered. MOSA values the deliberative process regarding inclusion of any synthetic material on the National List.

With regard to the questions posed in the Discussion Document on Synthetic Compostable Polymers we would offer the following responses:

- 1. Does the current listing for newspapers or other recycled paper, without glossy or colored inks, as a synthetic compost feedstock adequately address the contamination concerns related with these types of products? Are there suggestions for improving this annotation to better reflect the role that paper has as a compost feedstock?**
  - *MOSA has reviewed and approved compost from municipalities (which we note may include leaf collection bags) for use by several clients. Our current policy requires confirmation that biodegradable plastic bags are not accepted by these composting operations. Additionally, we would note that paper is listed both at 205.601(b)(2)(i) as a mulch material and at 205.601(c) as a compost feedstock. We currently have 20 clients who list paper as a mulch. MOSA supports a consistent interpretation of paper. As such any paper that is considered compliant for use as a mulch should also be permitted as a compost feedstock.*

- 2. What are the risks and benefits to allowing all compostable polymers to be included as compost feedstocks in organic compost?**
  - *The risk that MOSA identifies with including compostable polymers as an allowed synthetic compost feedstock is our understanding that these materials need to degrade such that the residues will not present a risk of contamination to the crops, soil and/or water on organic operations. When evaluating a compost containing compostable polymers MOSA will necessarily have to evaluate whether these polymers have been sufficiently degraded by the composting process. Specifically, we would ask the NOSB to consider whether or not the composting standards present at 205.203(c)(2)(i-iii) would meet this requirement. If so can the same be said regarding the standards in section 4.2 of NOP 5021? MOSA currently uses both of these standards to evaluate whether composts containing manure may be used without a pre-harvest restriction, but we are not certain that they would be sufficient to establish that compostable polymers had been sufficiently degraded. In particular, we have received feedback from a composting operation that produces both NOP compliant compost and compost containing post-consumer compostable serviceware which indicates these requirements may not be sufficient. Notably, they did not consider the time and temperature standards described at 205 203(c)(2)(i-iii) to be sufficient to completely degrade the compostable polymers present in the post-consumer food waste they compost.*
- 3. What are the risks and benefits to continuing the current prohibition on compostable polymers' inclusion in organic compost?**
  - *From MOSA's perspective, the benefit to continuing the current prohibition on compostable polymers is that it would not alter regulations that are well known throughout the organic industry. As mentioned above, we currently list hundreds of compliant composts in addition to many further manufactured inputs that contain compost as an ingredient.*
- 4. There have been suggestions to create an allowance for compostable food contact labels (e.g. fruit stickers) and compostable waste collection bags in order to reduce contamination in compost and get more food waste out of the landfill and into compost facilities, but to prohibit compostable plastics in organic compost when they're used in single-use service wear (e.g. cups, clamshells, utensils). What are the risks and benefits to this approach?**
  - *The risk that we see with this approach involves the difficulty of verifying that food contact labels and/or compostable waste collection bags are the only compostable plastics incorporated into a given compost. Since all of these compostable materials are intended to break down in a finished compost, is there an empirical measure that we could use to verify that a compost did not include single use compostable serviceware?*
- 5. What are the unique contamination risks associated with composting food waste and the associated compostable polymers that typically come with food waste?**
  - *MOSA recognizes that the most unique contamination risk would perhaps be the fact that serviceware manufactured with compostable polymers looks almost identical to that which is manufactured with conventional plastics. While we acknowledge the presence of UREC in compost as described in the discussion document, the reliance on a composting facility to distinguish between a fork made from compostable polymers versus a fork made from conventional plastic would present a heightened risk that perhaps rises above the current*

*threat that compost may contain prohibited synthetic contamination. We do not think that the contamination threat posed by inadvertent conventional serviceware should be considered unavoidable.*

**6. What other factors should NOSB consider when evaluating compostable polymers for inclusion on the National List?**

- *As we have mentioned we are particularly concerned with how compostable polymers are handled by a composting operation. Are there standards according to which these polymers would need to be processed in order for them to be considered compliant with their listing on the National List? If so we would like for this to be clear when these materials are added to the National List.*

**7. Is the approach to evaluating UREC and contamination, as described in this document, consistent with organic principles?**

- *MOSA agrees with the understanding of UREC and contamination that the crop subcommittee summarizes in the discussion document. Prohibited synthetic materials that can be kept out of organic production should be. This has been a guiding principle that MOSA has used when evaluating the compliance of crop inputs. For example, our review of a mined mineral as a crop input would include verification that it had not been treated with any prohibited dust suppressants during processing. Even though a dust suppressant would be present in a minimal amount and though it may have been added for the benefit of the manufacturing process rather than for a technical function, a mined material that included a prohibited synthetic processing aid would be prohibited from use on a MOSA certified operation. Changing this long held review process, or reviewing new materials in a fundamentally different way, would be a significant shift for the organic industry. We support the continued distinction between contamination and UREC.*

We would again like to thank the NOSB for your work on this complex issue. MOSA appreciates your careful consideration of the multitude of issues raised by BPI's petition. We also especially value the opportunity to comment on this important issue.

In closing, we emphasize the importance of a thorough and comprehensive process that considers all stakeholder feedback. This timeline does not allow for either adequate time to provide feedback on the significant proposal documents up for NOSB determination at this spring meeting, or to ensure NOSB has sufficient time to consider stakeholder feedback. This timeline needs no further emphasis; the verbal comments are before letters are due, which is the day before the meeting begins, and the regulations.gov portal is down from Friday until Monday morning, very unfortunate timing all the way around. We would prefer to see all proposals be planned for further discussion and voting at the next meeting.

Respectfully submitted,

The MOSA Certification Team