



# OREGON TILTH FARM FAQs

## **What are the restrictions to using pressure-treated wood in fence posts and other structures?**

Section 205.206(f) of the NOP Final Rule declares that “a producer must not use lumber treated with arsenate or other prohibited materials for new installations or replacement purposes in contact with soil or livestock.” The Preamble (Crop Production--Changes Based on Comments (7)) elaborates on 205.206(f):

“This provision prohibits the use of lumber treated with arsenate or other prohibited materials for new installations or replacement purposes in contact with an organic production site. We included this modification to clarify that the prohibition applies to lumber used in direct contact with organically produced and handled crops and livestock and does not include uses, such as lumber for fence posts or building materials, that are isolated from production. The prohibition applies to lumber used in crop production, such as the frames of a planting bed, and for raising livestock, such as the boards used to build a farrowing house.”

OTCO requires a buffer to prevent contamination of organic fields, crops or livestock. This may require a barrier of some sort between the post and the ground, crop, or livestock. This is site and condition-specific, so you'll need to check in with OTCO staff to see what might be needed for your site or condition.

## **Which crops require a 120 day pre-harvest interval when manure is applied?**

Crops intended for human consumption and whose edible portion has direct contact with the soil surface or soil particles require a 120 day pre-harvest interval (PHI). A 90 day PHI is required for those crops whose edible portion does not come in contact with soil particles (i.e. orchard fruit). How the crop is grown and harvested with regards to soil contact will determine which pre-harvest interval is to be used.



## **How do I know that the materials I use on my land are compliant with the NOP National List?**

Growers are responsible for ensuring that materials chosen for use meet the NOP, including all ingredients. The National List functions as the formal list of allowed synthetics and prohibited natural materials as exceptions to the general understanding that anything natural is allowed and synthetics are prohibited. In the event that specific ingredients are confusing or hard to understand, consulting the manufacturer or asking OTCO are good options. OMRI is also a good resource for determining compliance.

## **How am I to know if inert ingredients contained in pesticide products I use are on EPA List 4?**

Most materials containing inert ingredients do not specify which list these ingredients are on. Organic production allows only EPA List 4 synthetic inerts in pesticides. Verification from the manufacturer that synthetic inert ingredients, contained in pesticides, are on List 4 is needed to demonstrate compliance. Often times manufacturers are unwilling to disclose the identity of inerts, but may be willing to confirm whether they are all on EPA List 4 or not. Approval by OMRI or an accredited certifier can also be used to demonstrate that the inerts are acceptable.



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## Where can I find certified organic compost and/or soil?

Only agricultural products can be certified. Thus, soil and compost are not eligible for organic certification. However, §205.203 of the NOP Final Rule requires that the compost be produced through a process that:

established an initial C:N ratio between 25:1 and 40:1

maintained a temperature of between 131 F and 170 F for 3 days using an in-vessel or static aerated pile system

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.

Further recommendations on managing compost, along with information on using compost teas and vermicompost can be found in the Compost Task Force Final Report, submitted to USDA by the National Organic Standards Board (NOSB) in 2002.

## How do I verify compliance with the compost standards?

Compost standards are difficult to comply with and require records of ingredients used, turnings, and temperature readings to meet the current prescription outlined in Section 205.203(c) (2) of the NOP. Please note that when manure is not an ingredient, plant matter does not require composting and can be applied at any time prior to harvest. When raw manure is an ingredient and composting procedures do not meet the NOP requirements, the manure standards apply with regards to pre-harvest intervals.

## How do I verify commercial unavailability of organic seeds to justify my use of non-organic seeds?

Organic seeds are required for organic production unless commercially unavailable. OTCO considers at least three attempts to source organic seed from sources to be the minimum in demonstrating unavailability. Attempts to source organic seed should be documented in farm files to justify the use of non-organic, untreated and non-GMO seeds.

