



## Get to Know PCO

DIANA KOBUS | Pennsylvania Certified Organic

**F**ounded in 1997 as Pennsylvania Certified Organic (PCO) by a small group of farmers, PCO now certifies approximately 1700 clients under the USDA National Organic Program (NOP) standards, in states across the United States. We are the fifth largest certifier in the country; our main office is in Pennsylvania and we have a fully remote staff. We work hard to achieve a level of customer service that informs our clients and supports them in their certification processes.

Our vision is that all communities are enriched through organic food and farming, and our mission is to ensure the integrity of organic products and serve our farming community. PCO's Core Values serve as a guide for how PCO works and makes decisions every day. Through these core values, we recognize the interdependent relationships between all our stakeholders: certified clients, supporters

and members, PCO staff and contractors, partner organizations, and the community and environment.

1. We keep people at the center of every action, interaction, and decision.
2. We promote restorative practices that improve the world for future generations.
3. We embrace transparency and integrity in all our work.

Some areas of specialty knowledge in the organic industry where PCO really shines are: mushrooms, poultry and affiliate programs, our materials program, and the Organic Plus Trust (OPT) Certified Grass-fed Organic standard.

PCO also strives to build the relationship between client and certifier. While our staff is not permitted to give advice on exactly how any one client should meet requirements of



the NOP, we can direct you to guidance and resources to help you through the process, and provide support through the application, documentation, and record keeping processes along the way. Customer service is a source of pride for our team, and if you are thinking about organic certification, we'd love to hear from you!

## Q&A with PCO

Recently, AMI solicited questions from members on organic issues. Below are the questions, along with answers from PCO. You can find more resources on PCO's website [www.paorganic.org](http://www.paorganic.org).

Questions answered by PCO staff: Katie Poppiti, Certification Specialist Jen Berkebile, Materials Manager and Certification Director Kyla Smith.

*Please note there are no specific organic regulations that pertain specifically to mushrooms, and therefore there are some discrepancies in interpretation among certifiers. The answers below reflect PCO's policies in evaluating organic certification for mushrooms.*

**Q:** Considering the only difference between "organic certified" and regular hay-based compost, is the pesticide used in the growing process, why can't regular compost be accepted for use with "organic certified" farmers? The compost is made and treated the exact same way with exception of pesticide. All pesticides are degraded by temperature and humidity (Phase IV pasteurization process).

**A:** Technically, compost cannot be "organic certified"; only agricultural products intended for human or livestock consumption can be certified organic. However, compost can be sourced from organic operations, or it can be sourced from conventional operations or compost manufacturers. Regardless of the source, compost needs to be reviewed prior to use on an organic operation. Organic certifiers need to review and approve all inputs used in any compost, as well as the composting process itself. For this reason, some composts made on conventional or organic operations may be permitted for use in organic production, and some may be prohibited. Because compost inputs are reviewed as part of the organic certification process, it is unlikely that a compost sourced from an organic operation is prohibited; however, certifiers still need to completely review the inputs and composting process. The compost may end up being prohibited if the manufacturer is unwilling to share information, for example, or if it is from a split operation and the compost comes from the conventional side where

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prohibited inputs are used. Pesticides used during the growing process are not considered ingredients in the compost and do not affect whether or not the compost is eligible to be used on an organic operation.

**Q: Why is it that non-PCO certifiers (OC, NOFA, VDACS, etc) only see the word “manure” without trying to understand the entire pasteurization process and timeline in hay based mushroom compost?**

**A:** The organic regulations at §205.203 specify soil fertility and crop nutrient management practice standards. Manure is specifically mentioned with requirements for application, unless it is composted according to standards. In addition, the NOP has published guidance documents on compost and processed manure. All together, these resources list the following requirements for compost:

Compost is the product of a managed process through which microorganisms break down plant and animal materials into more available forms suitable for application to the soil. Compost must be produced through a process that combines plant and animal materials with an initial C:N ratio of between 25:1 and 40:1. Producers using an in-vessel or static aerated pile system must maintain the composting materials at a temperature between 131°F

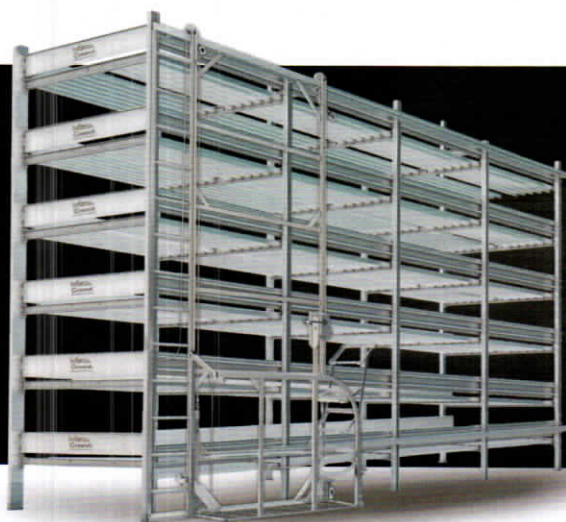
and 170°F for 3 days. Producers using a windrow system must maintain the composting materials at a temperature between 131°F and 170°F for 15 days, during which time, the materials must be turned a minimum of five times.

Alternative Composting Methods are clarified in NOP handbook document 5021. Compost is acceptable if (i) made from only allowed feedstock materials; (ii) the compost undergoes an increase in temperature to at least 131°F (55°C) and remains there for a minimum of 3 days; and (iii) the compost pile is mixed or managed to ensure that all of the feedstock heats to the minimum temperature for the minimum time.

Processed Manure/Heat Processed Manure guidelines are specified in NOP handbook document 5006. Processed manure may be used as a supplement to a soil building program without a specific interval between application and harvest. Processed manure must be treated so that all portions of the product, without causing combustion, reach a minimum temperature of either 150° F (66° C) for at least one hour or 165° F (74° C), and are dried to a maximum moisture level of 12%; or an equivalent heating and drying process could be used. Processed manure products must not contain more than  $1 \times 10^3$  (1,000) MPN fecal coliform per gram of processed manure sampled and must not contain

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more than 3 MPN Salmonella per 4 grams of processed manure sampled.

Certifiers that are less familiar with mushroom farm clientele will most likely associate the word "manure" with raw manure from dairy or poultry operations. However, if operators are able to supply information to their certification agency to show that the manure is no longer raw but rather meets any of the composting or processed manure requirements as listed above, the mushroom compost containing the manure should not be restricted as raw manure is. Supplying your certifier with clear and concise documentation up front about the composting materials and process, as well as any testing results for fecal coliform and salmonella, will allow your certifier to evaluate your mushroom compost appropriately.

**Q: Organic v. Sustainable. What is the status of sugar beet lime and recycled gypsum?**

**A:** Recycled Gypsum: The National Organic Program (NOP) regulations allow synthetic inputs only if they are specifically listed as allowed in the regulations; non-synthetic inputs are generally allowed, unless they are prohibited in the regulations. In addition, the NOP has clarified that gypsum "may not be sourced from recycled drywall" for use on organic crop operations. Regardless of this clarification, in many cases, recycled gypsum is synthetic, and since synthetic gypsum is not specifically listed in the organic regulations as allowed, it is prohibited. However, if it can be verified that recycled gypsum is non-synthetic, it may be permitted in organic production.

Sugar Beet Lime is considered a prohibited synthetic for organic production. The US does not allow it, but currently mushrooms grown with sugar beet lime in Canada are allowed into the US to be sold as organic. It would need to be petitioned for crop use to be allowed in the US.

**Q: Currently certified organic spawn is not available in the US. However, some European countries are beginning to ask for certified organic spawn. Do you expect that US spawn makers will be required to produce certified organic spawn for those mushroom growers who wish to be certified by PCO in the near future?**

**A:** Currently, the National Organic Program standards allow for the use of non-organic mushroom spawn if and only if organic spawn are not commercially available. Other international organic standards may always require the use of organic spawn; regardless, PCO operators will continue to be allowed to use non-organic spawn if organic is not commercially available, unless the NOP organic regulations

change to require this. There is nothing currently indicating that this change would occur anytime soon.

**Q: When making organic oyster mushroom substrate, does the straw and the cottonseed hulls used in the substrate need to be certified organic also?**

**A:** Operations producing ready-to-use spawn (formed as blocks, packaged into plastic bags, or shaped into logs) are required to hold organic certification but PCO *does not* require the raw materials (such as straw and cottonseed hulls used in substrate production for organic oyster mushrooms) to be certified organic. PCO would need to verify that the raw materials are allowed for that use and that no prohibited substances were used as a "treatment" for the raw materials, similar to review criteria for any other crop soil amendment.

However, if a ready-to-use spawn product is imported, the product (i.e. ready to use log) must be certified organic.

**Q: What are acceptable supplements for use in making organic oyster mushroom substrate?**

**A:** In general, non-synthetic inputs are allowed for use in organic crop production unless specifically prohibited at §205.602 of the organic regulations. PCO has approved some non-synthetic materials that are not prohibited at §205.602 for use as mushroom supplements. These include, but are not limited to: hay, non-synthetic gypsum, and sawdust from untreated, unpainted wood. If you have a supplement you wish to use that is not listed on the PCO Approved Crops Materials List, you can submit to your Certification Specialist at PCO.

**Q: Is it acceptable to use gypsum (calcium substrate) in organic oyster mushroom substrate production?**

**A:** Gypsum is an acceptable substrate, provided that it can be verified to be non-synthetic. Non-synthetic gypsum is of a mined origin, undergoes no chemical processing, and contains no prohibited additives. ♣

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