

Compost Tea Comment 6-8-04.txt

From: Kirk Leonard [kirk@oregonatural.com]  
Sent: Tuesday, June 08, 2004 4:28 PM  
To: NOSB Crops  
Cc: Benham, Katherine; Darlene Hoolley  
Subject: Compost Tea Comment

Dear members of the NOSB Crops Committee:

You recently received the Compost Tea Task Force report and recommendations on compost tea. This is the first of several comments I would like to make on it, concerning test requirements in the recommendations. The report itself is a pretty good treatise on tea, so some good work was done. Thank you.

The pathogen test recommendations are manageable but restrictive - even prohibitive in some circumstances. USDA could not do all the testing implied in recommendation #5!

I suggest tests be re-oriented to machine (or "brewer") performance with all composts and additives, rather than specific tea combinations. Here's why:

Compost tea producers need to 'customize' products for different applications. For instance, blueberries require a much different set of microorganisms for nutrient cycling than beans. Typically, different compost mixes are used to achieve the best application - different additives are used, as well, depending on soil- and plant-specific needs. The range of possible input combinations for effective compost tea is large and the CTF recommendation for testing teas is too limiting. The potential need for an un-ending series of tests is both prohibitive and unreasonable.

A grower cannot be expected to test every combination of composts and additives and machines and still raise a variety of certified crops with these test requirements! Most growers also make compost tea in substantial quantities and cannot afford not to use the tea with each compost or additive change, pending testing. It's not practical.

Ultimately, the tests recommended are tests of the machines used, so I suggest focusing test requirements on the tea machine, rather than teas, is both more manageable and appropriate.

> Some number of tests to establish the safety of a tea machine using  
> all  
additives and composts ought to reduce test requirements for all combinations. If a given tea machine has performed well in prior tests, further test requirements should be eliminated for the composts and additives tested.

> Suggestion: When a given tea machine has passed *ecoli* or *enterococci*  
> tests  
some number of times (six seems sufficient, twelve ample) using a given set of additives and composts, the tea made with that machine should be henceforth certifiable with any combination of those additives and composts.

Another major comment on tests is that USDA should fund them. And they should absolutely fund collecting the data. Proof of danger in compost tea has not been shown - only the possibility. No one has ever reported a problem. If USDA insists on tests, they should pay for them.

Thank you again for your good work.

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