

From: Kirk Leonard [kirk@oregonatural.com]  
Sent: Wednesday, June 16, 2004 3:15 PM  
To: NOSB Crops  
Cc: Benham, Katherine  
Subject: NOSB CTF Report Comment

Dear NOSB members:

I have a comment on the Compost Tea Task Force report you received 4/29/04. It is about sanitizing agents for compost tea machinery.

Recommendation #2 requires sanitizing per 21 CFR 178.1010. Why? I believe it would be both more appropriate and more clear if the recommendation simply stated that appropriate dilutions of hydrogen peroxide or chlorine or a few kinds of soap were required, preferably natural soaps.

Additionally, many of the substances in the CFR reference seem to be materials that are hazardous to both people and the biology of compost tea. Residues could easily wreak havoc with teas. It also seems to me that many of the substances in the reference are not allowed by NOP. Not being a chemist I may be wrong, but if that is the case it does not seem appropriate.

The cleaning of compost tea equipment should not, and does not require restaurant-level sanitizing, and most of the substances specified in 21 CFR 178.1010 are unnecessary, potentially even counterproductive.

Hydrogen peroxide or chlorine dilutions are often used in cleaning tea equipment, but there are many other natural cleansers used which are quite sufficient and equally safe. Well-designed and maintained tea equipment can often be adequately cleaned simply using pressure washing with clean water, and tea itself is a good cleaning agent in combination with a little rubbing or light brushing.

The key here is the principal cleaning problem, which is biofilm buildup, not pathogens. Clean tea equipment does not harbor pathogens - nor does good compost tea, for that matter.

I support the report, but this provision seems inappropriate. A short list of acceptable, common cleaning agents would be much better for both users and certifiers.

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