

**MEMORANDUM TO THE NATIONAL ORGANIC STANDARDS BOARD****April 9, 2025****FROM:** Erin Healy, Standards Division Director  
National Organic Program (NOP)**SUBJECT:** Petition Received: Compostable Plastics as Allowed Compost Feedstocks

This memorandum is in response to a petition from World Centric that requests changes to the organic regulations to explicitly allow compostable products, which meet ASTM Standards and are free of per- and polyfluoroalkyl substances (PFAS), as compost feedstock in organic production. NOP requests that the Board discuss the petition and submit a recommendation, if appropriate, on the topic of compost feedstocks.

**World Centric Petition to the United States Department of Agriculture**

On April 7, 2025, World Centric submitted a petition (attached) for rulemaking to the United States Department of Agriculture (USDA). World Centric manufactures compostable and reusable foodservice and packaging products. The petition asks the NOP to engage in rulemaking to explicitly allow compostable products, which meet ASTM Standards and are free of per- and polyfluoroalkyl substances (PFAS), as compost feedstock in organic production.

**Background**

Independent from World Centric's rulemaking petition, the NOSB has been working on topics related to compost, including a previous petition from the [Biodegradable Products Institute \(BPI\)](#) requesting that compostable plastics, which meet ASTM compostability specifications, be included as permissible feedstocks in organic compost. Additionally, they proposed amending 205.203(e) to allow de minimis traces of synthetic materials in fertilizers and compost. In response to this petition, the NOSB passed a [recommendation](#) to NOP in Fall 2024 and is still discussing a related document at its Spring 2025 meeting: [Compostable Synthetic Food Packaging Plastics and Cellulosic Fiber-Based Materials](#).

**National Organic Program's Request to the National Organic Standards Board**

The NOP asks that the Board review World Centric's petition and incorporate that review into its ongoing work on the topic of compost in organic production. If appropriate, submit feedback or a recommendation to NOP that addresses World Centric's petition.

Thank you in advance for your work on this topic, and we look forward to your discussion and guidance.



Secretary of Agriculture, Brooke Rollins

U.S. Department of Agriculture

1400 Independence Ave., S.W.

Washington, DC 20250

March 19, 2025

**RE: Update National Organic Program Regulations to Include ASTM-Certified Compostable Plastics without PFAS as Allowed Compost Feedstock Materials**

Dear Secretary Rollins:

I am writing to formally request the U.S. Department of Agriculture updates the National Organic Program (NOP) regulations to explicitly include compostable products that meet ASTM Standards and are free of per- and polyfluoroalkyl substances (PFAS) as allowed materials for compost feedstock in organic production.

**Background and Justification**

The NOP regulations at 7 CFR 205.203(c) currently address compost production requirements but do not specifically address modern compostable packaging and foodware that:

1. Meet established ASTM standards for compostability (specifically ASTM D6400, ASTM D6868, and/or ASTM D8410)
2. Contain no added PFAS chemicals
3. Completely disintegrate during the composting process before becoming part of the final soil amendment

Additionally, the NOP has already designated several materials as allowable compost feedstocks, including:

- Newspaper or other recycled paper, without glossy or colored inks
- Plastic mulch and covers (petroleum-based other than polyvinyl chloride (PVC))

- Biodegradable biobased mulch film as defined in § 205.2, provided it is produced without organisms or feedstock derived from excluded methods

Given these existing allowances, it is consistent with current NOP policy to include compostable products that meet ASTM Standards for compostability and safety.

### **Proposed Regulatory Update**

We propose that 7 CFR 205.203(c) be updated to include the following language:

"(5) Compostables may be used as compost feedstock materials provided they: (i) Meet ASTM D6400, ASTM D6868, and/or ASTM D8410 standards for compostability; (ii) Contain no added per- and polyfluoroalkyl substances (PFAS); (iii) Completely disintegrate during the composting process as defined in 7 CFR 205.203(c)(2); and (iv) Result in no detectable residues or synthetic chemicals in the final compost product when tested according to methods approved by the NOP."

### **Economic Benefits and America First Principles**

This proposed regulatory update aligns with America First economic principles and would provide significant benefits to the domestic bioeconomy:

#### **Supporting American Farmers and Rural Communities**

- Expands the market for plant-based feedstocks (particularly corn) used in compostable products, creating new revenue streams for American farmers
- Rural communities benefit from increased demand for agricultural products and potential job creation in bioplastics manufacturing
- Reduces dependence on foreign petroleum-based plastics by prioritizing domestically grown renewable resources

#### **Strengthening the Domestic Bioeconomy**

- Provides the U.S. bioplastics sector with a competitive advantage through regulatory clarity and market expansion
- American corn growers directly benefit as primary suppliers of the polylactic acid (PLA) feedstock used in many compostable products
- Creates a circular economic model where American agricultural products are used, composted, and returned to American soil

### **Job Creation and Economic Growth**

- Expands manufacturing opportunities in the growing compostables sector
- Drives innovation in sustainable materials technology, positioning American companies as global leaders
- Creates skilled jobs throughout the supply chain from agricultural production to advanced manufacturing

### **Long-term Economic Sustainability**

- Reduces future remediation costs associated with persistent plastic pollution
- Decreases dependence on volatile petroleum markets for plastic production
- Positions American agriculture at the center of a sustainable materials economy

This update would represent a significant step toward economic self-sufficiency in materials production while supporting American farmers and manufacturers who are working to develop alternatives to conventional plastics.

### **Scientific Evidence**

Research has demonstrated that properly certified compostable plastics meeting ASTM D6400 standards disintegrate and biodegrade during industrial composting processes that align with NOP requirements. The ASTM standards specifically require:

- 90% disintegration within 84 days
- 90% biodegradation within 180 days
- No toxic effects on plants and soil organisms in the resulting compost

These criteria ensure that when used as compost feedstock, these materials will not persist in the final organic soil amendment.

This proposed update remains consistent with organic principles because:

1. It maintains the integrity of organic production by ensuring no prohibited substances remain in the final compost
2. It provides clear, testable standards to verify compliance
3. It explicitly prohibits PFAS, addressing growing concerns about these persistent chemicals

## **Conclusion**

The proposed regulatory update would provide clarity for organic producers while maintaining the high standards of the National Organic Program. It recognizes advances in compostable materials technology while ensuring that organic integrity is protected through clear standards and verification requirements.

We appreciate your consideration of this petition and would welcome the opportunity to provide additional information or clarification as needed.

Thank you,

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