



Policy Memorandum

To: Stakeholders and Interested Parties

From: Miles V. McEvoy, Deputy Administrator
National Organic Program

Subject: Biodegradable Biobased Mulch Film

Date: Approved on January 22, 2015

A handwritten signature in blue ink, appearing to read "Miles V. McEvoy", with a horizontal line underneath.

This policy is directed at certifying agents and material evaluation programs that are reviewing biodegradable biobased mulch film products for compliance with the USDA organic regulations (7 CFR part 205).

On October 30, 2014, the USDA organic regulations were amended to allow the use of biodegradable biobased mulch film in organic crop production (79 FR 58655). The term “biodegradable biobased mulch film” was added to sections 205.2 and 205.601 of the USDA organic regulations. The National Organic Program (NOP) has received questions from certifiers and material evaluation programs regarding interpretation of the term “biobased” in evaluating products for compliance. This policy memorandum clarifies how certifying agents and material evaluation programs should review the biobased requirement for these products.

As explained in the final rule, and consistent with the National Organic Standards Board’s (NOSB) recommendation for this material, certifiers and material review organizations should review these products to verify that all of the polymer feedstocks are biobased. Pigments and processing aids are not considered feedstocks. ASTM International defines biobased as organic material in which carbon is derived from a renewable resource via biological processes. Biobased materials include all plant and animal mass derived from carbon dioxide recently fixed via photosynthesis, per definition of a renewable resource. Biobased feedstocks are composed of biological products or renewable agricultural or forestry materials.

Biodegradable mulch film that contains non-biobased synthetic polymer feedstocks, such as petrochemical resins, does not comply with the USDA organic regulations.

References

Organic Foods Productions Act of 1990, as amended

7 U.S.C. § 6517 National List

USDA Organic Regulations ([7 CFR Part 205](#))

7 CFR § 205.2 Terms Defined



Biodegradable biobased mulch film. A synthetic mulch film that meets the following criteria:

- (1) Meets the compostability specifications of one of the following standards: ASTM D6400, ASTM D6868, EN 13432, EN 14995, or ISO 17088 (all incorporated by reference; see §205.3);
- (2) Demonstrates at least 90% biodegradation absolute or relative to microcrystalline cellulose in less than two years, in soil, according to one of the following test methods: ISO 17556 or ASTM D5988 (both incorporated by reference; see §205.3); and
- (3) Must be biobased with content determined using ASTM D6866 (incorporated by reference; see §205.3).

7 CFR § 205.601 Synthetic substances allowed for use in organic crop production.

(2) Mulches.

(iii) Biodegradable biobased mulch film as defined in §205.2. Must be produced without organisms or feedstock derived from excluded methods

NOSB Recommendations

[NOSB Recommendation for Biodegradable Biobased Mulch Film.](#)

Approved on January 22, 2015

If you have any questions regarding this memorandum, please contact Lisa M. Brines at (202) 720-3252 or lisa.brines@ams.usda.gov.