



United States
Department of
Agriculture

Agricultural
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Service

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MEMORANDUM TO THE NATIONAL ORGANIC STANDARDS BOARD

FROM: Miles V. McEvoy
Deputy Administrator
Agricultural Marketing Service
National Organic Program (NOP)

SUBJECT: Assessing Soil Conservation Practices

The USDA organic regulations at 7 CFR § 205.200 require that production practices on organic operations must maintain or improve the natural resources of the operation, including soil and water quality. Additionally, these regulations contain the following soil quality provisions for cropping and grazing systems:

- Organic producers must select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of soil and minimize soil erosion (§ 205.203(a)).
- Organic producers must manage plant and animal materials to maintain or improve soil organic matter content, without contamination of crops, soil or water with plant nutrients, or pathogens (§ 205.203(c)).
- Organic producers must use crop rotations, including cover crops to provide erosion control, as warranted by site-specific conditions (§ 205.205(d)).
- Organic ruminant livestock operations must describe their soil fertility and seeding systems; and erosion control and protection of natural wetlands and riparian in their pasture plans (§ 205.240(c)).

The National Organic Program (NOP) is aware of concerns regarding use of appropriate soil conservation practices on organic farms, for instance prevention of soil erosion, fencing of livestock from streams, application of manure on frozen soil, and overgrazing of pasture. The NOP is evaluating the compliance aspects of the regulation's soil conservation provisions. The NOP believes that information about how certifying agents, in aggregate, are assessing soil management practices may reveal areas that could benefit from targeted training and tools. Therefore, the NOP requests that the National Organic Standards Board (NOSB) Certification, Accreditation, and Compliance Subcommittee (CACS) develop a discussion document to solicit public feedback on specific questions about evaluating soil conservation management on organic operations.

Some questions that CACS could consider in development of a discussion document include:

- How do certifiers assess whether production practices, identified in an organic system plan and/or observed on-site, maintain or improve soil quality? Is visual assessment



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sufficient?

- What tools, other than visual inspection, could aid certifiers in evaluating soil management practices, e.g., Revised Universal Soil Loss Equation 2 (RUSLE2) or soil organic matter levels?
- What benchmarks do certifiers have for issuing noncompliances related to soil conservation: for instance, visible erosion, overgrazing, evidence of manure application on frozen ground, manure or compost stored in flooded areas? Are quantitative benchmarks used?
- What qualifications do certifiers seek among inspectors for evaluating soil management practices on-site?
- What tools do inspectors use (other than soil testing) to evaluate/measure the adequacy of soil management during on-site inspections? Is one on-site inspection enough to assess erosion if it is done during a single visit?
- How do certifiers respond if a review/on-site inspection indicates that there is a soil management problem? Do certifiers issue notices of noncompliance or note as a finding to be reassessed at a later time?
- How do certifiers respond when complaints are filed about a producer's soil management?
- Some USDA benefits require producers to be in compliance with Highly Erodible Land (HEL) provisions. Are certifiers aware of USDA Natural Resource and Conservation Service (NRCS) classification and HEL provisions? Should certifiers verify whether production acreage is classified as "highly erodible land" (HEL) and ensure appropriate soil management practices for HEL?¹
- Are certifiers aware of USDA NRCS's tolerable soil loss standards? Should certifiers verify whether production acreage has been assessed to meet tolerable and sustainable soil loss levels?
- When NRCS personnel who provide technical assistance on organic operations observe soil management risks and problems should the producer be required to communicate this information to their certifier

The NOP has provided some references below that may be useful for the CACS to consider as they work on a discussion document. We appreciate the assistance of the CACS in working to address this issue.

¹ The USDA Natural Resources Conservation Service defines highly erodible land (HEL) as having soil with an erodibility index of 8 or higher. Producers who participate in NRCS or Farm Service Agency programs and have highly erodible land need to maintain conservation practices to substantially reduce soil loss.
http://www.fsa.usda.gov/FSA/newsReleases?area=newsroom&subject=landing&topic=pfs&newstype=prfactsheet&type=detail&item=pf_20120412_consv_en_helcwc12.html



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References

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Organic System Plan Template for Crop and/or Livestock Production, March 2011, National Center for Appropriate Technology,
<https://attra.ncat.org/attra-pub/summaries/summary.php?pub=359>

Soil Health Assessment, Natural Resources Conservation Service,
<http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/health/assessment/>

RUSLE2 in Organic Systems (webinar), February 2012, the [USDA NRCS East and West National Technology Support Centers](#), <http://www.forestrywebinars.net/webinars/rusle2-in-organic-systems/>