



United States
Department of
Agriculture

Agricultural
Marketing
Service

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MEMORANDUM TO THE NATIONAL ORGANIC STANDARDS BOARD

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

SUBJECT: Biodegradable Biobased Mulch Film

On January 22, 2015, the National Organic Program (NOP) published Policy Memo 15-1, Biodegradable Biobased Mulch Film. The policy memo clarifies how biodegradable biobased mulch film should be reviewed by certifying agents and material evaluation programs for compliance with the USDA organic regulations.

In response to a recommendation of the National Organic Standards Board (NOSB), biodegradable biobased mulch film was added to the National List on October 30, 2014 (79 FR 58655). The USDA organic regulations include a definition of biodegradable biobased mulch film and include additional criteria for biodegradable biobased mulch film.

Several stakeholders have notified the NOP that there are no products currently on the market that meet the requirements for biobased content that are described in Policy Memo 15-1. In response to this feedback, the NOP contracted with the Organic Material Review Institute to develop a report that describes the biobased status of commercially available biodegradable biobased mulch products and their compliance with the USDA organic regulations.

The report is available for the public on the NOP website for [Petitioned Substances](#). The NOP is requesting that the NOSB Crops Subcommittee add the review of this report to its work agenda to determine if any additional action is needed by the NOSB.

References

Organic Foods Production Act of 1990, as amended
7 U.S.C. § 6517 National List

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

7 C.F.R. § 205.2 Terms Defined.



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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 C.F.R. § 205.601 Synthetic substances allowed for use in organic crop production.

(b) As herbicides, weed barriers, as applicable.

(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.](#)