Soil Amendments Overview

A soil amendment refers to any material added to the soil to improve its physical or chemical properties. With fresh fruits and vegetables, food safety concerns are most often associated with biological contamination by pathogens in manure-based soil amendments. However, chemical hazards associated with inorganic fertilizers can represent a chemical risk to crops as well as to those who apply the fertilizers. Many inorganic fertilizers are federally regulated so the first rule is to always follow the label because the label is the law. Proper storage practices and controlling access to these chemicals is also important to meet federal requirements and reduce the chance of chemical contamination on the farm.

Manure-based soil amendments can harbor pathogens that can cause illness in humans and may contaminate produce when introduced into the production environment. This overview is intended to provide general guidelines and recommendations to reduce the likelihood of produce microbial contamination when using manure-based soil amendments.

- If it is unknown whether the manure-based soil amendment is raw or fully composted, it should be considered raw manure.
- Recommended time intervals from application of raw manure to the harvest of the produce crop vary from 90 days to 1 year. These recommendations are discussed in more detail below.

Raw Manure

When a crop is grown on land on which raw manure has recently been applied, there is a risk that the crop could be contaminated because of the likelihood of foodborne illness pathogens being present and the increased risk of crop contamination. If raw manure is used as a soil amendment or fertilizer, it should never be applied during the growing season and always be incorporated into the soil within 72 hours after application. The interval between raw manure application and harvest should be maximized. The required time frame between application and harvest varies throughout the industry. The Leafy Greens Marketing Agreement (LGMA)\(^1\) requires an interval of at least one year. The National Organic Program (Rule 7 CFR Part 205.203) recommends applications be at least 90 days before harvest for crops that have edible portions which do not come in contact with the soil and at least 120 days before harvest of crops that have edible portions which do come in contact with the soil (crops in or near the soil are most vulnerable to contamination). The proposed Food Safety Modernization Act (FSMA)\(^13\) Produce Rule would require nine months between a raw manure application and harvest of a produce crop covered by the rule. Some research even shows that pathogens can persist in the soil well beyond this time frame\(^2,3,4,5\) and therefore some leafy green buyers require a five year interval.\(^6\)

Aside from raw manure purposely applied to fields, it is important to consider manure that may enter the field through runoff, wildlife animal intrusion, or movement from adjacent lands that have domesticated farm animals. Please see the Wildlife and Animal Management and Land Use Decision Trees to assess these risks.
Compost

Composting animal manure can reduce microbial pathogens and greatly reduce the risk of contamination to fruit and vegetable crops. Simply piling manure without actively managing and monitoring it, or using an anaerobic system (also called ‘aging’), is not composting and therefore must be considered raw manure. If the same equipment or tools are used on raw, cured, or curing piles, be sure to clean and sanitize them after use on raw manure to avoid recontamination of the other piles.

Compost must maintain a temperature of between 131 and 170°F for 3 days (enclosed system) or 15 days (windrow system), during which period the composting materials must be turned a minimum of five times. After these steps, the compost pile should cure for 45 days. Finished and curing compost piles should be covered in order to prevent recontamination. Acceptable organic materials for compost include, but are not limited to: animal manure, byproducts of agricultural commodities processing, yard debris, and kitchen wastes. Detailed records should be kept of pile type (aerobic vs. anaerobic, enclosed, windrow, etc.), temperature and moisture management, dates turned, and the duration of high temperatures. The Northeast Recycling Council and the Cornell Waste Management Institute’s Compost Fact Sheet Series 1–8 provide specific guidelines and tips for composting manure to assure its safe and effective use as a fertilizer. Furthermore, if commercial compost is treated by a scientifically valid controlled physical or chemical process, or combination of these processes, in accordance with the FSMA requirements to meet the microbial standard, there is a 0 day interval between application and harvest.

Leachates and Teas

Leachates and teas are used as foliar fertilizers and soil amendments to suppress pests and diseases, as well as enhance soil biology. Compost leachate is the liquid coming out of compost when water from irrigation, rain, or snow filters through the compost. Compost tea is made from compost steeped in water. There are two basic types of compost tea, aerated and non-aerated.

- Aerated tea = manure/compost mixed with water (1:10-50) and then aerated by injection or re-circulated water for 12–24 hours.
- Non-aerated tea = manure/compost mixed with water (1:3-10) and left untouched for several days (1–3 weeks).

To reduce the risk of pathogen contamination of produce:

1. Use potable water when mixing compost teas. The proposed FSMA Produce Rule requires any tea be mixed with water that is free of generic E.coli determined through testing.
2. Use properly composted manure. There is no application restriction on using compost tea made from properly composted manure, though it should only contact the soil and not the edible portion of the crop.
3. Raw manure teas can only be applied to soil and not directly to plants, and should follow the one-year harvest interval.
4. Additives (molasses, yeast, etc.) must follow the same one-year application to harvest interval as raw manure.
5. Compost leachate may be applied to the soil with the 90/120 day rule. It may NOT be applied directly to plant.
6. Teas may NOT be applied to edible seed sprouts.

Recordkeeping

Recordkeeping should always be part of your food safety program. Developing a recordkeeping system that is easy to use will encourage soil amendment
applicators to properly document their activities and support the implementation of a farm food safety plan. Documentation should include:

- Type of soil amendment being applied
- Composting method and microbial testing (if applicable)
- Fields receiving application
- Date of application
- Rate (quantity applied per acre)
- Method of application
- What crops will be planted

References

The information in the template food safety plan, SOPs, and recordkeeping logs are examples you can use. They are not intended to be used directly. Tailor each to fit your farm operation and practices. These documents are guidance for risk reduction and for educational use only. These documents are not regulatory and are not intended to be used as audit metrics. These documents are subject to change without notice based on the best available science.
Soil Amendments Decision Tree

1. Do you use inorganic fertilizer?
   - No
   - Yes
     - Are inorganic fertilizers stored in a covered area that is separate from where produce is handled or stored?
       - No
         - State in plan: “No inorganic fertilizer is used on the farm”. Go to question 4.
       - Yes
         - Are inorganic fertilizer storage facilities checked weekly and cleaned when necessary?
           - No
             - Storage facilities should be inspected weekly to check for spills to reduce risks of chemical contamination. Use the Chemical Storage Facility Monitoring Log to document maintenance checks and cleanings.
           - Yes
             - Do you use raw untreated manure (e.g. teas, leachates, and slurries) on the farm?
               - No
                 - State in plan “No raw animal manure is used on the farm”. Go to question 1.
               - Yes
                 - No
                   - Yes
                     - No
                       - Yes
                         - No
**Soil Amendments Decision Tree**

**5.** Do you incorporate raw untreated manure into the soil at least 1 year before harvest?

- **No**

  Raw manure presents a food safety risk because it contains pathogens that can contaminate fresh produce. When using raw manure, reduce risks by incorporating it into the soil within 72 hours after application, and never apply it during the growing season. Maximize the time between manure application and crop harvest to reduce risks. The LGMA requires a 1 year harvest interval, while the NOP requires 90/120 days and the FSMA proposed produce rule requires 9 months. Refer to the Soil Amendments Overview for more information and references.

- **Yes**

**6.** Do you avoid spreading raw untreated manure on fields that are water saturated, prone to annual flooding or runoff, or are frozen or snow covered?

- **No**

  Manure applied to fields that are water saturated or prone to flooding can leach and contaminate surrounding production areas and water sources. Be sure to know and follow municipal, state, and federal rules and regulations. Your Natural Resources Conservation Service (NRCS) state offices will have current state standards on water quality protection practices (codes 590 and 633).

- **Yes**

**7.** If raw untreated manure is stored on your farm, is it covered and physically contained?

- **No**

  Runoff, leachate, and wind spread from raw manure piles can result in the contamination of produce, soil, and water sources. To reduce risks, manure piles should be physically contained and covered to protect them from rainfall and wind. The minimum containment for storage is on a concrete slab. Raw manure should never be piled in a produce field or on bare soil.

- **Yes**
Is raw untreated manure from livestock, manure containment structures, storage piles, and composting facilities located at least 400 feet from produce fields and handling sites?

If manure is close to production areas, there is a risk that it will contaminate produce by runoff or wind spread. Safe distances for storage will vary depending on the amount of manure present, crop location (downhill and/or downwind) from source, likelihood of runoff or leaching, physical barriers present, and how storage piles/facilities are protected.

Is raw untreated manure located at least 200 feet from well heads?

Manure storage areas can leach pathogens into the soil, wells, and other water sources. Wells are particularly susceptible to contamination if they are not capped or properly constructed. To reduce risks of well contamination, be sure the well is properly constructed and capped, install back-flow devices, keep animals out of the well recharge area, store manure downhill from the well, and make sure water runs away from the well head.

Is raw untreated manure separated from surface water sources used during the production of fresh fruits and vegetables?

Raw manure storage areas near surface water can result in water contamination, either by runoff or through leaching. Safe distance recommendations from the surface water source depend on soil type and slope of land. The Leafy Greens Marketing Agreement (LGMA) recommends at least 100 feet if soil is sandy, 200 feet if soil is clay or loam, and 300 feet if slope is greater than 6%.
Soil Amendments Decision Tree

Do you use composted manure or compost manure on your farm?  

Yes  

Is the composting process done on your farm?  

Yes  

If you get your compost from a supplier, ask for documentation about the composting method and microbial testing to include in your records.  

No  

Do you properly process/compost manure according to industry standards? For compost guidelines refer to the Soil Amendment Overview.  

Yes  

Composting manure reduces food safety risks by reducing the likelihood that pathogens are present. Composting requires specific active processing treatments; passive treatments like “aging” do not count as composting. For composting standards, refer to the Soil Amendment Overview. If proper composting practices have not been met by you or your provider, then you must follow the application and storage guidelines for raw manure outlined in questions 5–10.  

No  

Do you keep finished compost under covered storage?  

Yes  

If you store finished or curing compost on your farm, it should be covered to prevent recontamination of the pile. It can be covered with a tarp or stored in an enclosed facility. Recontamination of a compost pile can occur by rain, wind spread from adjacent manure piles, or bird or other animal intrusion.  

No  

Go to Question 16.
Soil Amendments Decision Tree

**Is compost stored at least 30 feet\(^{14}\) from produce fields and 80 feet\(^{10}\) from water sources?**

- **No**
  - Composted manure is less likely to contaminate crop and water sources than raw manure; however, the best practice is to cover and store the compost as far away as possible from water sources and produce fields. When assessing your farm’s risk, some factors to consider are the field locations (uphill or downhill) from compost, likelihood of wind-spread, presence of runoff or leaching, amount of compost being stored, and any physical barriers that are present.

- **Yes**
  - **Do you keep records of the following?**
    - Type of fertilizer being applied
    - Method of application
    - Field receiving applications
    - Date of application
    - Rate (quantity applied per acre)
    - What crops will be planted
    - Compost production methods and microbial testing (if applicable)

- **No**
  - Recordkeeping is critical to keeping track of soil amendment applications, both for plant and soil fertility as well as safety. Utilize the *Soil Amendment Application Log* for your food safety plan and application recordkeeping.

- **Yes**
  - Finished

---

References


Sample Compost Process Log

Name of farm: Pleasant Valley Farm

Type of compost method: Windrow  Date piled: 9-15-2012  Date finished:  Row number: 2

List all ingredients added to compost: Poultry manure, kitchen scraps, dried leaves, straw

Use this log if you produce compost on your farm. Record all ingredients and your composting method including the date piled, turning dates, and the temperatures maintained. Use one sheet for each pile or row.

<table>
<thead>
<tr>
<th>Date Turned</th>
<th>Temp Test Area 1</th>
<th>Temp Test Area 2</th>
<th>Temp Test Area 3</th>
<th>Temp Test Area 4</th>
<th>Initials</th>
</tr>
</thead>
<tbody>
<tr>
<td>9-25-2012</td>
<td>135</td>
<td>138</td>
<td>140</td>
<td>135</td>
<td>abc</td>
</tr>
</tbody>
</table>

Proper compost production requires that a temperature of between 131°F and 170°F be maintained for 3 days using an enclosed system OR a temperature of between 131°F and 170°F for 15 days using a windrow system, during which the materials must be turned 5 times (National Organic Program. 2012. Rule 7 CFR part 205.203. Soil fertility and crop nutrient management practice standard. http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&rgn=div5&view=text&node=7:3.1.1.9.32&idno=7#7:3.1.1.9.32.3.354.4).

Reviewed by: _____________________________  Title: _____________________________  Date: _____________________________
Sample Soil Amendment Application Log

Name of farm: Pleasant Valley Farm

This log should be used to record soil amendments applied to fields on your farm. Use one log for each crop for each season.

<table>
<thead>
<tr>
<th>Date</th>
<th>Plot</th>
<th>Crop</th>
<th>Quantity Used</th>
<th>Type of Amendment</th>
<th>Date Planted</th>
<th>Date Harvested</th>
<th>Application Method</th>
<th>Initials</th>
</tr>
</thead>
<tbody>
<tr>
<td>5/2/2013</td>
<td>*A-1</td>
<td>Tomato</td>
<td>1.5 tons/acre</td>
<td>Composted manure</td>
<td>5/15/2013</td>
<td>7/1/2013</td>
<td>Broadcasting</td>
<td>ska</td>
</tr>
</tbody>
</table>

*This is the code name of the field/plot/row you have designated for that area (same as you will use in your traceability program). For example, A is the field and 1 is the plot within that field.

Reviewed by: __________________________________________ Title: ___________________________ Date: ___________________________
# Sample Chemical Storage Facility Monitoring Log

**Name of farm:** Pleasant Valley Farm

<table>
<thead>
<tr>
<th>Date</th>
<th>Floors swept</th>
<th>Floors washed</th>
<th>Foreign material removed</th>
<th>Checked for signs of rodents</th>
<th>Checked for leakage</th>
<th>Initials</th>
</tr>
</thead>
<tbody>
<tr>
<td>6/11/13</td>
<td>✔</td>
<td></td>
<td></td>
<td>✔</td>
<td>✔</td>
<td>ALW</td>
</tr>
</tbody>
</table>

Reviewed by: ___________________________________________  Title: ___________________________________________  Date: _______________________

---

Template Language for Soil Amendments
Section of a Farm Food Safety Plan

Risk Assessment
Inorganic fertilizers represent a chemical contamination risk to crops. We are aware of the chemical hazards associated with inorganic fertilizers and have implemented practices to reduce these risks. Practices are outlined below.

Biological soil amendments, including raw manure, represent a food safety risk because they can carry foodborne illness pathogens that can contaminate fields and fresh produce when they are applied. We have completed a risk assessment of the soil amendment applications we use on the farm and implemented practices to reduce identified risks. Our composting practices have also been assessed and are documented to ensure the processes we use are effective at minimizing food safety risks.

Actions
Inorganic fertilizers are never kept near where produce is grown, handled, or stored to reduce the risk of chemical contamination. Documentation of storage area monitoring and cleaning is kept in the Chemical Storage Facility Monitoring Log and can be found [state location]. We always follow the label for determining rates of applications.

Raw manure is applied and incorporated in the field at least [state # of days] before planting and at least [state # of days] before harvest. Manure applications are documented in the Soil Amendment Application Log located [state location]. In order to minimize leaching and contamination, raw manure is never spread on fields that are water saturated, prone to annual flooding, runoff, or are frozen or snow covered [OR Manure is sometimes spread on fields that are water saturated, prone to annual flooding, runoff, or are frozen or snow covered but is done in accordance with state regulations [describe regulations]].

(You must choose either A or B depending on whether or not you store manure on your farm.)

A. Manure is applied to fields immediately, requiring no storage areas on the farm.

B. Manure stockpiles are stored on farm and therefore all possible precautions are taken to prevent contamination of crop production areas, water sources, and produce handling facilities. Manure stockpiles are covered with a [state material], physically contained by [describe containment], and stored [state distance] from water sources, [state distance] from produce production and handling areas. [Describe any other precautions taken to minimize contamination by runoff and windspread, such as downhill, downwind, or use of vegetative buffers]
Composting Practices (if applicable)
(You must choose either C or D depending on if you buy or make compost.)

C. We purchase composted manure from [state company name]. We keep the compost microbial test results and certificate of their process on file and keep the records [state location].

D. Manure is processed on our farm and is properly composted before application to reduce pathogens. Our [state type of compost pile] system reaches a temperature of at least [state temperature (must be at least 131°F)] for [state # of days] days, after which it cures for at least 45 days. It is turned [state # of turns] times. We keep a Compost Process Log to document these procedures.

Compost Storage (if applicable):
(You must choose either E or F depending on your farm situation.)

E. Composted manure is applied immediately after it is received, requiring no storage on farm.

F. To prevent recontamination of compost piles and contamination of nearby water sources by runoff, compost piles are covered with a [state material], and stored [state distance] from surface water, [state distance] from well heads, and [state distance] from produce fields. [Describe any other precautions taken to minimize contamination by runoff and windspread, such as downhill, downwind, or use of vegetative buffers].

Recordkeeping
Records are kept of fields receiving soil amendments, including type (raw, composted manure, or inorganic), quantity, application method, dates of application, fields where it was applied, and crops planted (pertains to raw manure users – at least 1 year). We keep a Soil Amendment Application Log to document all application practices. All recordkeeping logs are located [enter location here] and stored for [enter time period here—should be at least 2 years].