Preduce Safety



Cornell University



Module 3: Soil Amendments

Learning Objectives

- Identify potential routes of contamination associated with soil amendments
- Explain soil amendment handling practices that may reduce risks
- Identify key strategies such as composting or application intervals to reduce risks
- Describe corrective actions that may be utilized if a soil amendment presents a risk
- Identify recordkeeping tools for monitoring and managing soil amendment handling, application, and proper use



What Is A Soil Amendment?

- Soil amendments are any chemical, biological, or physical materials intentionally added to the soil to improve and support plant growth and development
- May reduce soil erosion and sediment runoff
- Many different types of soil amendments are available
- Soil amendments can present produce safety risks
- Assessing risks and implementing GAPs can reduce risks





Soil Amendments & Food Safety Risks



- Biological soil amendments, especially those that include untreated (raw) manure, pose significant microbial risks
- Synthetic (chemical) soil amendments can also impact food safety, if not prepared and applied properly
- Risks should be assessed when selecting and applying all soil amendments on produce fields



Assessing Your Risks

- What type of soil amendments do you use?
 - Raw manure, composted manure, chemical, etc.
- What crops receive soil amendments?
 - Fresh produce or agronomic crops
- When do you apply them?
 - Days to harvest, time of year
- How do you apply them?



- Incorporated, injected, surface applied
- How much and how often do you apply them?
 - Excessive application can lead to environmental impacts



Chemical Soil Amendments

- Minimal risk of human pathogens
 - Cannot be considered 100% safe
 - Synthetic fertilizers, minerals
- Can pose chemical risk to humans



- Be sure workers are trained to apply properly and use personal protective equipment
- Follow all application instructions
- Proper labeling and storage



Human Waste & Biosolids

- Human waste is prohibited for use on produce crops, unless it meets the EPA regulation for biosolids (40 CFR part 503)
- Untreated human waste may contain pathogens, heavy metals, or other contaminants
- May not be accepted by produce buyers
- Management of biosolids not discussed because use is infrequent in fresh produce production



Pre-Consumer Vegetative Waste

- Should not be considered zero risk and may contain:
 - Chemical hazards
 - Physical hazards
 - Biological hazards
- Examples include:
 - Produce food preparation waste
 - Out of date vegetables
 - Food products removed from their packaging





Non-Manure Based Soil Amendments of Animal Origin

 Should be processed to eliminate pathogens or must be considered untreated biological soil amendments of animal origin



The Value of Manure

- Increases soil tilth, fertility, and water holding capacity
- Sound nutrient management and waste utilization for those with animal production or partnering with other farms who have animals
- Widely available and cost effective







Pathogens in Animal Manure

- All manures can carry human pathogens
- Some animals tend to be reservoirs for certain pathogens
- Many things can affect animals shedding pathogens in their manure
 - Age
 - Rearing practices
 - Diet
 - Season
 - Environmental conditions





Untreated Soil Amendments

- Untreated biological soil amendments of animal origin are considered high risk since they have not been treated to reduce or eliminate pathogens
- All of the following soil amendments would be considered untreated:
 - Raw manure
 - 'Aged' or 'stacked' manure
 - Untreated manure slurries
 - Untreated manure teas



- Agricultural teas with supplemental microbial nutrients
- Any soil amendment mixed with raw manure



Reducing Soil Amendment Risks

- Selection
- Treatment
- Application Timing

- Application Methods
- Handling and Storage
- Recordkeeping





Composting as a Treatment

- Composting is a <u>controlled</u> biological process that decomposes organic matter and reduces pathogens
- Temperature is the primary method of pathogen reduction for thermophilic composting; however, chemical and biological factors also contribute
- Only a composting process that has been scientifically validated ensures pathogen reduction
- Process monitoring and recordkeeping are critical to ensuring the compost is adequately treated



Properly Composted Manure

High temperatures are maintained by;

- Manipulating the compost pile inputs (feed stocks)
- Proper carbon to nitrogen ratios
 - Initial C:N ration of between 25:1 and 40:1
- Moisture percentage
- Aeration

Going the Extra Step

- Cure compost
 - Leave finished compost in an undisturbed pile for at least 2 months.
- Remember
 - Keep curing or finished compost away from 'active' compost piles.
 - ****Best practice**: store, cover or apply finished compost immediately following curing stage.**



Composted Manure

(lower risk)

- Substantially reduces microbial pathogens
- Finished product will yield a valuable soil amendment, with few pathogens, if composted properly.
- Safety Considerations
 - Compost temperature not monitored
 - Failure to properly turn compost pile
 - Finished compost contaminated by nearby manure piles
 - Curing finished compost

Composting Options

Must use a scientifically valid process:

- Aerated static composting: aerobic, minimum 131°F (55°C) for 3 days, followed by curing with proper management to ensure elevated temperatures throughout all materials
- Turned composting: aerobic, minimum of 131°F (55°C) for 15 days, minimum 5 turnings, followed by curing
- 3. Other scientifically valid, controlled composting processes





Properly Composting Manure

Two popular methods

- 1. In-vessel or static aerated pile system
 - Temperatures must be maintained of at least 131 °F for 3 days



Aerated Bay Compost System. URI Peckham Farm, September 2010.



Forced aeration. A powered blower will force air through this pipe to the compost pile. A slotted wooden floor will cover the aeration pipe.

Properly Composting Manure

- 2. Windrow composting system
 - Temperatures must be maintained of at least 131 °F for 15 days, during which time, the materials must be turned a minimum of five times.



Properly Composting Manure



Reducing Risks During Application

Steps you should take to reduce risks:

- Preferentially apply soil amendments containing manure to crops not intended for fresh consumption
- Maximize the time between application and harvest
- Do not contact the edible portion of the crop during application.
- Do not side-dress with raw manure
- Minimize risks to adjacent produce crops if you are field spreading manure





Minimum Application Intervals

 There are currently no application intervals for raw manure outlined in the FSMA Produce Safety Rule



- Untreated Soil Amendments
 - FDA is currently pursuing further research to support application intervals for raw manure
 - Raw manure must not be directly applied to the harvestable portion of the crop

Treated Soil Amendments

Zero day application interval for compost treated by a scientifically validated process

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PSR vs RIGAP NOP recommended vs required



Fresh or Raw Manure

Application Recommendations - NOP

 Incorporate into the soil (after harvest period) before the ground freezes

OR

- Incorporate into the soil
 - 120 days prior to harvest of product whose edible portion in direct soil contact OR
 - 90 days prior to harvest of product whose edible portion does **NOT** have direct soil contact

*Avoid growing root and leafy crops in the year that manure is applied to a field

Handling Recommendations

 Designate specific equipment and tools for handling soil amendments



- Develop SOPs to clean and sanitize equipment and tools that contact soil amendments and fresh produce
- Direct traffic (foot, equipment) around soil amendment storage or processing areas to reduce the risk of cross-contamination



Storage Area Recommendations

- Minimize runoff, leaching, and wind drift to reduce contamination of crops, water sources, and handling areas by soil amendments
 - Cover piles
 - Build berms to prevent runoff



- Do not store in locations that are likely to experience runoff or areas that are close to water sources
- Keep raw manure and finished compost in separate areas to prevent cross-contamination
- Minimize animal access to compost piles



Worker Training

Workers who handle soil amendments, both treated and untreated, should:

- Understand SOPs for properly completing tasks which require managing raw manure or compost
- Make sure clothes, boots, and gloves are clean before handling produce
- Wash hands after handling







Recordkeeping: Soil Amendments

Soil amendments can introduce microbial risks, so you should document:

- Type and source of soil amendment
- Rates and dates of application
- Handling and sanitation practices used that reduce risks



There are a few records required for treated biological soil amendments of animal origin within the Produce Safety Rule

• Some details are outlined on the next few slides



Recordkeeping: On-Farm Composting

Key factors in the composting process must be documented. These may include the following steps depending on the process used:

- Time
- Temperatures
- Turnings
- Other processing steps







Recordkeeping: Soil Amendments Supplied by a Third Party

Documentation should be kept of:

- The name and address of the supplier
- What soil amendments were purchased
- The date and amount purchased
- Lot information, if available



Documentation must be collected from the supplier:

- To ensure the supplier has used scientifically validated treatment processes and monitoring during the production of the treated amendment (including compost)
- To ensure proper handling requirements have been met

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Corrective Action Plan

- Outline steps that could be taken if soil amendments:
 - Pose a microbial risk to the crop
 - Were improperly treated
 - Accidentally contacted the edible portion of the crop
- Think of alternative market options
 - Processing markets that involve a "kill" step
- Document in your plan





Summary

- Soil amendments can introduce produce safety risks, especially those that contain raw manure
- To reduce risks associated with soil amendments:
 - 1. Apply untreated manure to non-produce fields
 - 2. Treat raw manure using a scientifically validated, controlled process
 - 3. Extend the time between application of raw manure and harvest
- Make sure storage areas do not contaminate fields, water sources, or packing areas
- Train workers who handle and apply soil amendments
- Develop sanitation steps for tools and equipment
- Keep records of soil amendment applications and treatments

