

Dear USDA-accredited Certifying Agent:

The National Organic Program (NOP) was notified of a discrepancy between certifying agents in the review of imported pre-inoculated “shiitake mushroom log” products for organic mushroom production.

#### Decision

This notice clarifies that operations producing ready-to-use spawn are required to hold organic certification. Information received by the NOP indicates that documents accompanying imported products may inaccurately describe ready-to-use spawn products as mushroom “spawn.” Unless these products are certified, they may not be used. Certifiers that have previously approved the use of ready-to-use spawn as part of an organic system plan need to take steps to notify affected growers that any ready-to-use spawn must be certified organic to be approved for use. Previously approved products that are not in compliance must be removed from organic system plans by May 1, 2019.

Additional information on this decision is provided below:

#### Background

For the purpose of this notice, the term “ready-to-use spawn” is defined as colonized substrate prepared for producing harvestable mushrooms (fruiting bodies) in situ with proper humidity and temperature control. In contrast, the term “spawn” is defined as colonized media used to inoculate substrates on which mushrooms are grown. Ready-to-use spawn may be produced in a variety of formats, including but not limited to, formed as blocks, packaged into plastic bags, or shaped into logs. For example, “shiitake mushroom logs” may consist of plastic bags containing mixtures of fibrous materials (e.g., wood chips, sawdust, wheat bran, husks), processed mined substances (e.g., gypsum), and mushroom inoculant.

#### Justification

NOP Instruction 4009 in the Program Handbook stipulates a certified operation may not, “Allow an uncertified operation to produce or handle agricultural products, under contract or other arrangement, on the uncertified operation’s land or premises (i.e., at units, facilities, or sites not explicitly subject to inspection or compliance action by the NOP or a certifying agent).”

Because ready-to-use spawn includes all components to produce harvestable mushrooms, it is considered an agricultural product under the USDA organic regulations (see § 205.2 definition of agricultural product). Ready-to-use spawn used in organic mushroom production must be produced by certified organic operations (see § 205.100(a) What has to be certified). Certification is essential to ensure that an accredited certifying agent conducts annual inspections of the production facility and reviews substrates and spawn in these products for compliance with USDA organic regulations.

It may be argued that using non-organic ready-to-use spawn products, such as “shiitake mushroom logs,” is equivalent to using non-organic seed when not commercially available. The NOP disagrees with this assessment, because “shiitake mushroom logs” are not used to inoculate medium at the certified operation to produce a crop in a related manner that seeds are planted into soil to produce a seedling. Rather, the pre-inoculated “shiitake mushroom logs” contain the spawn, growth medium and nutrients required to produce a mushroom crop upon watering and are not placed in new containers or growth medium at the certified operation. Additionally, “shiitake mushroom log” producers might argue that

they do not require certification because they do not handle any certified organic ingredients. We disagree with this argument because they are producing an agricultural product for use in certified organic production. To ensure equal oversight to entities involved in organic mushroom production and to ensure organic integrity, "shiitake mushroom logs" and other ready-to-use spawn products used in organic mushroom production must be produced by a certified facility.

If you have any questions regarding this notification, please contact your Accreditation Manager.

Regards,

Cheri Courtney

Director, Accreditation and International Activities Division

USDA National Organic Program

Notice to Certifying Agents - Shiitake mushrooms