

Third-Party Soil Amendment Suppliers
Food Safety Modernization Act (FSMA) Produce Safety Rule
Model Certificate of Conformance

March 26th, 2025

To whom it may concern;

Black Earth Compost LLC's product Black Earth Compost meets the definition of a treated biological soil amendment of animal origin¹ in the FSMA Produce Safety Rule. This product has undergone a scientifically valid treatment, with appropriate process monitoring, to conform to one of the following microbial standards.

YES Groton, Framingham

§112.55(a): No detectable *L. monocytogenes*, *Salmonella* spp., and *E. coli* O157:H7

- For *L. monocytogenes*, detection limit 1 CFU in 5 g or 5 mL
- For *Salmonella*, detection limit 3 MPN in 4 g (total solids) or 4 mL (if liquid is being sampled)
- For *E. coli* O157:H7, detection limit 0.3 MPN in 1 g or 1 mL analytical portion

YES Manchester

§112.55(b): No detectable *Salmonella* spp., and fecal coliforms <1000 CFU in 1 g or 1 mL total solids

- For *Salmonella*, detection limit 3 MPN in 4 g (total solids) or 4 mL (if liquid is being sampled)

The process used to achieve this treatment status was:

YES Manchester, Groton Aerated static composting with 3 or more days at temperature followed by adequate curing

- Turned (windrow) composting with 15 or more days at temperature and 5 or more turnings, followed by adequate curing

YES Framingham Other: Turned windrow composting with 45 or more days at temperature followed by adequate curing

Appropriate control parameters **Time, Temperature and Number of Turnings** were monitored throughout the treatment process.

This product has been handled, conveyed, and stored in a manner and location to minimize the risk of contamination by an untreated or in-process biological soil amendment of animal origin. Practices used to minimize contamination risk include:

Yes Physical separation of in-process product from finished product

Yes Storm water and runoff were directed away from finished product

- Different equipment was used for handling finished product

Yes Equipment was cleaned and sanitized before handling finished product **Bucket is emptied and flushed with tailings**

Yes Other: Truck used for delivery is dedicated only for finished product

Andrew Brousseau, Compost Operations

Notes:

¹ For soil amendments that do not contain materials of animal origin, state regulations may require a separate statement specifying that the product does not meet the definition of a biological soil amendment of animal origin (BSAAO). Soil amendments that do not meet the definition of a BSAAO are not covered by the FSMA Produce Safety Rule. For this reason, it may be useful to describe the compost feedstock in the first paragraph. The FSMA Produce Safety Rule definitions do not include, for example, human waste and pre-consumer vegetative waste as a BSAAO.

² FDA's draft guidance for industry (docket number FDA-2018-D-3631) states that:

"A farm that receives a treated BSAAO from a third party could keep a record that includes a statement such as: 'A scientifically valid thermal treatment was applied and carried out with appropriate process monitoring to satisfy the microbial standard in 21 CFR 112.55(a). The BSAAO has been handled, conveyed, and stored in a manner and location to minimize the risk of contamination.' In addition, other information related to producing or managing the BSAAO, such as the BSAAO materials used, process parameters monitored and their results, and any applicable test results could be included." (page 72)

In addition to the FDA requirements, industry representatives have indicated that the FSMA-optional language may be beneficial or required by state regulations, buyer requirements, organic audits, or other programs.

⦿ **§ 112.56 What application requirements and minimum application intervals apply to biological soil amendments of animal origin?**

(a) You must apply the biological soil amendments of animal origin specified in the first column of the table in this [paragraph \(a\)](#) in accordance with the application requirements specified in the second column of the table in this [paragraph \(a\)](#) and the minimum application intervals specified in the third column of the table in this [paragraph \(a\)](#).

Expand
Table


If the biological soil amendment of animal origin is—	Then the biological soil amendment of animal origin must be applied—	And then the minimum application interval is—
(1)(i) Untreated	In a manner that does not contact covered produce during application and minimizes the potential for contact with covered produce after application	[Reserved].
(ii) Untreated	In a manner that does not contact covered produce during or after application	0 days.
Manchester (2) Treated by a scientifically valid controlled physical, chemical, or biological process, or combination of scientifically valid controlled physical, chemical, and/or biological processes, in accordance with the requirements of § 112.54(b) to meet the microbial standard in § 112.55(b)	In a manner that minimizes the potential for contact with covered produce during and after application	0 days.
Groton Framingham (3) Treated by a scientifically valid controlled physical, chemical, or biological process, or combination of scientifically valid controlled physical, chemical, or biological processes, in accordance with the requirements of § 112.54(a) to meet the microbial standard in § 112.55(a)	In any manner (<i>i.e.</i> , no restrictions)	0 days.

Black Earth Compost

REPORT OF ANALYSIS

For: (60367) Black Earth Compost
Spring 2025

Analysis	Level Found		Reporting			Analyst-Date	Verified-Date
	As Received	Dry Weight	Units	Limit	Method		
Sample ID: Manchester	Lab Number: 70594635		Date Sampled: 2025-02-06 1500				
Percent solids	55.7		%	0.01	SM 2540 G-(2015) *	cvn2-2025/02/24	jsp9-2025/02/24
Salmonella	< 1.2	< 1.2	MPN/4g	1.2	TMECC 7.02 (mod)	Maw2-2025/02/24	snl7-2025/02/24
E. coli O157:H7	negative		org/25g	None	Real-Time PCR Assay; AOAC-RI 031002	Nmo4-2025/02/22	elh8-2025/02/23
Fecal coliforms	314.0	563.7	MPN/g	0.2	EPA 1681	ojb0-2025/02/22	snl7-2025/02/24
Listeria monocytogenes	presumptive positive		org/25g	1	Real-Time PCR Assay; AOAC-RI 121402/AFNOR QUA 18/10-01/19	zma6-2025/02/23	elh8-2025/02/23
Listeria monocytogenes Confirmation	Positive		org/25g	1	FDA BAM Chpt. 10	fjl0-2025/02/27	jzh4-2025/02/27
Sample ID: Groton	Lab Number: 70594636		Date Sampled: 2025-02-06 1500				
Percent solids	45.1		%	0.01	SM 2540 G-(2015) *	cvn2-2025/02/24	jsp9-2025/02/24
Salmonella	< 1.2	< 1.2	MPN/4g	1.2	TMECC 7.02 (mod)	Maw2-2025/02/24	snl7-2025/02/24
E. coli O157:H7	negative		org/25g	None	Real-Time PCR Assay; AOAC-RI 031002	kkb0-2025/02/23	elh8-2025/02/23
Fecal coliforms	2.4	5.3	MPN/g	0.2	EPA 1681	ojb0-2025/02/22	snl7-2025/02/24
Listeria monocytogenes	negative		org/25g	1	Real-Time PCR Assay; AOAC-RI 121402/AFNOR QUA 18/10-01/19	zma6-2025/02/23	elh8-2025/02/23
Sample ID: Framingham	Lab Number: 70594637		Date Sampled: 2025-02-06 1500				
Percent solids	51.7		%	0.01	SM 2540 G-(2015) *	cvn2-2025/02/24	jsp9-2025/02/24
Salmonella	< 1.2	< 1.2	MPN/4g	1.2	TMECC 7.02 (mod)	Maw2-2025/02/24	snl7-2025/02/24
E. coli O157:H7	negative		org/25g	None	Real-Time PCR Assay; AOAC-RI 031002	kkb0-2025/02/23	elh8-2025/02/23
Fecal coliforms	1.3	2.5	MPN/g	0.2	EPA 1681	ojb0-2025/02/22	snl7-2025/02/24
Listeria monocytogenes	negative		org/25g	1	Real-Time PCR Assay; AOAC-RI 121402/AFNOR QUA 18/10-01/19	zma6-2025/02/23	elh8-2025/02/23

The result(s) issued on this report only reflect the analysis of the sample(s) submitted.

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REPORT NUMBER

25-058-4199

REPORT DATE
Feb 27, 2025

RECEIVED DATE
Feb 21, 2025

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60367



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ISSUE DATE
Feb 27, 2025

Black Earth Compost

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For: (60367) Black Earth Compost
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	As Received	Dry Weight		Limit	Method		

EPA 1681 holding time of < 24 hours from sampling to laboratory set up of samples for biosolids and compost has been exceeded. Individual states enforce different holding times for compost or biosolids so please contact the regulatory body in your state for their requirements.

MPN = most probable number

For questions please contact:

Rob Ferris
Account Manager
rferris@midwestlabs.com (402)829-9871

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