June 3, 2021

Mr. Eddie Simons  
President, Association of American Plant Food Control Officials  
Washington Dept of Agriculture  
PO Box 42560  
Olympia, WA 98504-2560

Dear Mr. Simons, AAPFCO Board and Committee Chairs:

The US Composting Council is a trade group comprised of more than 2,000 individuals across the U.S. who are compost manufacturers, advocates and affiliated businesses associated with the composting industry. We are writing to urge AAPFCO to help compost product manufacturers to better distinguish the slowly releasing nature of phosphate in compost (and other carbon-based) products with accurate labeling.

Product labels should allow for the illustration of both slow releasing nitrogen and phosphate claims. We encourage AAPFCO’s allowance of slowly releasing phosphate claims for compost, and related products, as well as recognition of the SERA-17 water extractable phosphate test as a standard test procedure to measure quickly available phosphate.

The ability to claim slowly releasing phosphate (and nitrogen) is critical in the marketing and proper end use of compost, and other soil amendments which inherently contain plant nutrients.

We believe that this initiative will be beneficial for both product end users and the environment. Please contact us with any further questions about this issue, and we urge you to vote to allow this initiative to move forward.

Sincerely,

Frank Franciosi, Executive Director

CC: Ron Alexander, USCC representative, AAPFCO