



Your Operation and NEW Organic Regulations

How will your operation be affected? Use this assessment to find out!

The [Market Development for Mushroom and Pet Food Rule \(MDR\)](#) made changes to the USDA Organic regulations that **must be implemented by March 22, 2027**. These changes aim to foster growth in the organic mushroom industry, particularly by providing more clear guidelines for:

- mushroom substrate and spawn (including spawn media) composition
- sourcing of mushroom spawn
- composting for organic mushroom production

All organic mushroom operations will be impacted.

This self-assessment is intended to help you prepare for compliance with the revised organic mushroom production requirements by March 22, 2027. The completed assessment is for your records only and does not need to be submitted to PCO. **Depending on your operation and production practices, some requirements may not apply, and you may already be meeting others through existing practices. Review each item below to determine whether it applies to your operation and whether your current practices meet the requirement or if changes are needed before the implementation date.**

Requirements for all Organic Mushroom Operations:

The below section applies to mushroom operations that produce any organic mushroom or mushroom crop product (e.g. organic ready-to-use products or organic spawn).

A. General Management as an Organic Crop

1. [§205.210\(a\)](#): The MDR final rule clarified which sections of the existing crop production standards are required as part of an operation's mushroom management practices and which provisions are not relevant. **Only the sections referenced below are required.**

Mushroom producers must manage mushroom production in accordance with the following provisions:

- a. [§205.200 - General](#)
 - i. *Organic producers must follow applicable organic production requirements and use practices that maintain or improve the natural resources of the operation, including soil and water quality.*
- b. [§205.201 - Organic production and handling system plan](#)
 - i. *Organic producers must develop and follow an Organic System Plan, approved by their certifier, that explains how they will comply with the*

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organic regulations, including their practices, inputs, monitoring, recordkeeping, fraud prevention, and measures to protect organic integrity.

- c. **§205.202 (as applicable) - Land requirements**
 - i. *Land used to produce organic crops must be managed according to the organic regulations, be free of prohibited substances for at least three years before harvest and have clear boundaries and buffers to prevent contamination from neighboring land.*
- d. **§205.203(e) - Prohibited practices in the Soil fertility and crop nutrient management practice standard section**
 - i. *Organic producers may not use prohibited synthetic fertilizers or composts, sewage sludge (biosolids), or burn crop residues except to control disease or stimulate seed germination.*
- e. **§205.206(a)(2) and (3) and (b) through (f) - Specific requirements in the Crop pest, weed, and disease management practice standard section**
 - i. *Organic producers must prevent pests, weeds, and diseases primarily through cultural, mechanical, physical, and biological practices, may use approved inputs only when those practices are not sufficient, and must not use prohibited treated lumber in contact with soil or livestock.*

☐ Yes, my management practices include the required provisions as indicated above

☐ No, my management practices do not include the required provisions as indicated above

- If you answered no, consider how you will demonstrate compliance when you submit your OSP updates to PCO (in early 2027)

B. Contamination Prevention

1. **§205.210(b): Mushroom producers must manage mushroom substrate and mushroom spawn media, including spent mushroom substrate and mushroom spawn media, in a manner that does not contribute to contamination of crops, mushroom spawn, mushroom substrate, soil, or water by pathogenic organisms, heavy metals, or residues of prohibited substances on your operation.**

☐ Yes, I comply with the above requirements

☐ No, I do not comply with the above requirements

- If you answered no, consider how you will demonstrate compliance when you submit your OSP updates to PCO (in early 2027)

Requirements for Mushroom Operations using Mushroom Substrate:

The below section applies to mushroom operations that use or produce mushroom substrate as defined by the USDA organic regulations as *“the base material, such as grain, wood materials, composted materials, and/or other agricultural materials, on which mushroom production occurs.”* This includes substrate materials used in ready-to-use products.

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C. Mushroom substrate components

1. **§205.210(c)**: Mushroom substrate may be composed of:
 - (1) **Composted plant and animal materials**: Must be produced through a process that maintains a temperature of at least 131 °F for at least three days
 - (2) **Uncomposted plant materials**: Must be organically produced: *Except*, that, nonorganically produced uncomposted plant materials may be used when a functionally equivalent organically produced material is not commercially available. Prohibited substances must not be applied to nonorganically produced uncomposted plant materials after harvest.
 - (3) **Wood materials (e.g. chips, sawdust, logs)**: Must not have been treated with a prohibited substance after harvest
 - (4) **Nonsynthetic substances not listed at §205.602**
 - (5) **Synthetic substances allowed at §205.601**

Mushroom substrate used by mushroom operations is not required to contain all of the above components. However, mushroom substrate must not include any component not on the above list.

☐ Yes, I use mushroom substrate that complies with the above requirements

☐ No, I use mushroom substrate that does not comply with the above requirements

- If you answered no, consider how you will demonstrate compliance when you submit your OSP updates to PCO (in early 2027)

D. OSP and Recordkeeping Requirements

1. **§205.210(c)**: Mushroom producers OSP must describe their composting process and use of nonorganically produced uncomposted plant materials, including:
 - a. **procedures used to search for organic materials and records kept to document searches**
 - b. **criteria used to evaluate if functionally equivalent organic materials are commercially available**
 - c. **recordkeeping system used to document purchases of nonorganic materials**
 - d. **a summary of the type(s) and total amount of each nonorganic material used in mushroom substrate.**

☐ Yes, my OSP and recordkeeping system include the required descriptions and documentation as described above

☐ No, my OSP and recordkeeping system does not include the required descriptions and documentation as described above

- If you answered no, consider how you will demonstrate compliance when you submit your OSP updates to PCO (in early 2027)

Requirements for Mushroom Operations using Mushroom Spawn:

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The below section applies to mushroom operations that use mushroom spawn as defined by the USDA organic regulations as “mushroom spawn media colonized by mushroom mycelium that can be used to inoculate mushroom substrate.”

1. **§205.210(d)**: Mushroom spawn must be organic. Nonorganic mushroom spawn may be used to produce an organic crop when an equivalent organic mushroom spawn is not commercially available.

☐ Yes, I use mushroom spawn that complies with the above requirements

☐ No, I use mushroom spawn that does not comply with the above requirements

- If you answered no, consider how you will demonstrate compliance when you submit your OSP updates to PCO (in early 2027)

Requirements for Mushroom Operations Producing Mushroom Spawn to Sell as Organic

The below section applies to mushroom operations that produce mushroom spawn to sell as organic.

1. **§205.210(d)(1)**: Organic mushroom spawn may include the following components:
 - a. Agricultural materials used as mushroom spawn media must be organic. Nonorganic wood materials may be used so long as they have not been treated with a prohibited substance after harvest.
 - b. Mushroom spawn media may contain materials allowed in mushroom substrate:
 - i. Composted plant and animal materials
 1. Must be produced through a process that maintains a temperature of at least 131 °F for at least three days
 - ii. Nonsynthetic substances not listed at §205.602
 - iii. Synthetic substances allowed at §205.601

Organic mushroom spawn is not required to contain all of the above components. However, organic mushroom spawn must not include any component not on the above list. Additionally, organic mushroom spawn must be under continuous organic management after the mycelium is applied to the mushroom spawn media

☐ Yes, I produce organic mushroom spawn that complies with the above requirements

☐ No, I produce organic mushroom spawn that does not comply with the above requirements

- If you answered no, consider how you will demonstrate compliance when you submit your OSP updates to PCO (in early 2027)

Requirements for Mushroom Operations Producing Mushroom Spawn for Use on their Own Operation

The below section applies to mushroom operations that produce mushroom spawn for use on their own operation.

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1. [§205.210\(d\)\(2\)](#): Mushroom operations that produce their own mushroom spawn for their own organic mushroom production must use organic agricultural materials for mushroom spawn media, unless a functionally equivalent organic agricultural material is not commercially available. Wood materials may be used so long as they have not been treated with a prohibited substance after harvest. The commercial availability search does not apply to wood materials.

☐ Yes, I produce mushroom spawn for my own use that complies with the above requirements

☐ No, I produce mushroom spawn for my own use that does not comply with the above requirements

- If you answered no, consider how you will demonstrate compliance when you submit your OSP updates to PCO (in early 2027)