



# CCOF

Organic Certification Trade Association Education & Outreach Political Advocacy

## CCOF Fertilizer Sampling Initiative (FSI)

Implemented January 30, 2009.

### Purpose:

This sampling initiative is part of a multi-pronged effort to ensure the validity of fertilizer manufacturer ingredient and process claims; claims upon which CCOF bases its designation of the allowable status of these materials under the National Organic Program rule.

Specifically, this program will:

- Provide CCOF with additional monitoring data to be used as part of the overall approval process of high nitrogen liquid fertilizers claimed to be allowed under the NOP.
- Provide data points and sampling experience to encourage and promote the further development of the nitrogen isotope methodology as applied to organic fertilizers.
- Send an additional message to material manufacturers that CCOF is taking concrete proactive measures to increase oversight of material input compliance.

### Background:

Though the current nitrogen isotope methodology does not produce singularly conclusive results, at this point what we know is that the material's isotope signature received from the lab provides an indication of either confirming or calling into question the manufacturer's ingredient claim. The nitrogen isotope technique has been used for many years to determine nitrate contamination in groundwater.

The results of nitrogen isotope analysis will be used in conjunction with fertilizer manufacturer document submissions, as part of the 2009 Liquid Fertilizer Approval Policy, effective January 15, 2009.

Further, we believe this technology holds promise and thus we want to promote its development by taking samples, and analyzing the results with the best available understanding of the meaning of those results. CCOF's taking of samples will provide further field data toward the ongoing development and application of this nitrogen isotope testing to fertilizer materials.

### Scope:

Between February 1 and May 1, CCOF will sample at least 10 of the approximately 30 materials in question. As of February 6, two samples have already been taken, with analysis results received and logged. After May 1, CCOF will review the effectiveness of this initiative and determine the nature and extent of its extension.

Samples will be taken by Amy Lamendella, Sean Feder, or other qualified CCOF inspectors, as designated by Sean Feder, the Inspection Operations Director.

Samples will be sent to Institute for Environmental Health Labs Salinas. After consultation with industry experts, this IEH has been determined to be the current leader in nitrogen isotope analysis. CCOF will continue to confer with technical experts as to which laboratories are best suited to performing the analysis.

CCOF is consulting and conferring with a network of growers, fertilizer industry experts, CDFA, and other credible scientific and technical personnel, to determine the best methods of sampling and the best places to obtain clean sealed samples.



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The sampling protocol itself is contained in the document: Fertilizer Sampling Initiative Protocol, which is located G:\CCOF Certification Services\Complaints and Investigations\Fertilizer Complaint 2006\Fertilizer Sampling Initiative 2009.

### **Management:**

The initiative is being coordinated and managed by Sean Feder, Inspection Operations Director. A key associate is Amy Lamendella, who has taken the initial samples as of this date, and drafted the Sampling Protocol. Mr. Feder is principally responsible to ensure that the scope of this initiative is realized according to the prescribed timelines, including identification of sampling sites and sampling personnel, tracking and logging of analysis data, and to ensure follow up communications with key participants such as certification leadership team and any reviewers involved in the liquid fertilizer approval process.

### **Sampling Assignments in eCert:**

Sampling events will be assigned in eCert, under the 'client' entity: CCOF Investigation, code zz003. Specific Instructions will be placed in the Inspection Work Order as necessary, to identify the sampling target, and any other special circumstances relevant to the particular sampling. The document "Fertilizer Sampling Initiative Protocol" will be provided to the inspector, along with the IEH Sample Analysis Request Form, which also serves as the sample's chain of custody document.

zz003 is enrolled in Master Service: "3-other"; and subservice: "Investigation". To assign inspections or move inspection orders through the work flow, the Master Service must read "3-other", not "NOP". Only the Annual Inspection type exists now for these services.

Inspectors eligible to do fertilizer sampling must be designated for "investigations" under their Inspection Service tab. Qualified inspectors will be added as needed, by the Inspection Operations Director.

The Inspection Work Order (IWO) form will be generated, as a means of tracking and billing the assignment. Non-relevant parts of the current IWO can be left blank for the purposes of this program.

When the sampling inspections arrive at the home office, we will accept them in eCert like any other inspection. They will then be sent to a member of the certification leadership team for review, at which time they should be closed as an inspection in eCert.

### **Tracking and Presentation of Results:**

The analysis results documents are placed and stored in the folder: G:\CCOF Certification Services\Complaints and Investigations\Fertilizer Complaint 2006\Fertilizer Sampling Initiative 2009\Analysis.

The essential figures of each analysis result are entered into the spread sheet: "Sample Analysis Graphing", located at the same folder location. A consistent method for meaningfully graphing the results is currently being developed.