



CCOF

Organic Certification Trade Association Education & Outreach Political Advocacy

Announcement: 2009 Liquid Fertilizer Approval Policy

CCOF's goal is to ensure the highest level of verification and implementation of the National Organic Program. Due to CCOF's ongoing concern regarding the potential for fraud in the production of liquid fertilizers, we are enacting the following policy effective January 15, 2009 to protect CCOF organic growers, consumers, and the organic community. CCOF has identified products that are flowable liquids with high nitrogen levels, high incidence of use and/or other attributes to be subject to this policy. For background information on the issues regarding liquid fertilizers, please see the bottom of this announcement.

1. CCOF will no longer internally review blended liquid fertilizers that are not OMRI or WSDA listed and that exceed a nitrogen analysis of three. **Only liquid fertilizers listed by OMRI or WSDA will be allowed for use by CCOF certified operations.** Existing materials that are not listed must seek appropriate listings immediately. At this time, liquid kelp and stabilized fish products composed of greater than 90% fish will be approved for use by CCOF growers if they are OMRI or WSDA listed.
2. In addition to OMRI or WSDA listing, CCOF requires that **by August 15, 2009, manufacturers of liquid fertilizers selected by CCOF MUST undergo third party on-site inspections.** CCOF will contact affected manufacturers by February 15, 2009. These companies must notify CCOF by May 1, 2009 which organization will perform their inspection.

During these inspections, manufacturers must **demonstrate compliance with NOP organic regulations pertaining to farm inputs or their products will be prohibited for use by CCOF operations. Evidence of successful inspections addressing the points below must be provided to CCOF by October 1, 2009.** Manufacturers will be required to undergo additional monitoring inspections every 24 months or as deemed necessary by CCOF.

CCOF will communicate directly to CCOF growers after October 1, 2009 regarding any products that are no longer approved for use. To ensure manufacturers and their customers are treated fairly CCOF will not disclose the identity of subject products and manufacturers until they have had an opportunity to undergo inspection and demonstrate compliance.

Inspections may be conducted by OMRI, WSDA, CDFA, ASCO, the National Organic Program, or other state or federal agencies approved by CCOF. Alternative inspection bodies, waivers, or extensions may only be issued by CCOF if warranted. CCOF clients and others are invited to contact CCOF to suggest materials or manufacturers that they believe should be subject to this policy by emailing ccof@ccof.org.

In order to approve any identified liquid fertilizers for use by our clients, CCOF requires each manufacturer to provide:

- Documentation from inspection body indicating no evidence of fraud in formulation, including verification of the presence of ALL necessary infrastructure to produce approved organic products such as dry and liquid storage, appropriate conveyance (forklifts, piping, etc.), finished product storage, and both ingredient and finished product transportation infrastructure.
- Documentation verifying no synthetic nitrogen equipment, tanks, or supplies are within 100 yards of facility producing organic approved inputs at any time of the year.
- Documentation verifying a successful audit has been performed comparing incoming ingredients and outgoing finished products.

CCOF salutes the tremendous efforts of organic farmers and their customers. We are proud to work for them to ensure the ongoing integrity of organic products. Thank you for your support of CCOF and organic food and farming.

Background: For more information regarding the history of this issue please see CCOF's article "*Liquid Fertilizer: Friend or Foe*" in the Spring 2007 issue of *Certified Organic* (www.ccof.org/magazine_Spring2007.php). CCOF taken action and spoken out strongly on this issue to protect organic producers and consumers. We have worked with a variety of regulators, clients, farmers and manufacturers for several years. CCOF has brought suspicious materials to the attention of several different bodies including WSDA, OMRI and CDFA while keeping NOP apprised of developments. Additional information and a history of announcements regarding this issue is available under Updates/Resources within the certification area of www.ccof.org.