

From: CDFA [mailto:ffldrsdb@cdfa.ca.gov]
Sent: Friday, May 12, 2017 1:00 PM
To: xxx
Subject: FFLDRS: Notice to Industry

May 11, 2017

Notice to Fertilizing Material Licensees

Use of the term “Bat Guano” on Fertilizing Material Labels

Dear Fertilizing Materials Licensee:

Bat guano has been increasing in use within fertilizing material products. A variety of descriptive terms are attached to bat guano, including “high nitrogen bat guano”, “high phosphorous bat guano”, and “fossilized bat guano”. In order to ensure uniformity in labeling in California and provide accurate representation to consumers, the Fertilizing Materials Inspection Program will be implementing standards for labeling of bat guano. Beginning January 1, 2018, all new labels must meet the new labeling standards. For registration renewals of bat guano-containing products, firms must develop and submit a plan to meet those standards for products in the channels of trade. The plan must be submitted and approved during the renewal cycle beginning on January 1, 2018, and must be fully implemented at the next renewal cycle.

As of January 1, 2018:

1. In order to be registered for distribution in California, products claiming to be bat guano must be consistent with the following definition:

-Bat guano is partially decomposed bat excrement, with an “as is” organic matter content greater than 40%. Bat Guano is a source of nitrogen (N), and may contain up to 6% available phosphate (P2O5).

1. Registration application for any product claiming to be bat guano must provide documentation of the supplier and provide a laboratory analysis for the total organic matter content, total nitrogen (N), and available phosphate (P2O5) of the product.

2. At the Department’s discretion, products submitted for registration as bat guano may require additional testing, including an analysis for bat DNA and an analysis of the mineral content using quantitative microscopy, prior to registration.

3. Labels that specify the origin of the bat guano must provide proof of that claim.

4. Fossilized bat guano is not an acceptable term on fertilizing material labels.

5. Fertilizing products listing bat guano as an ingredient in the derivation statement must provide an invoice or proof of that ingredient listing the complete ingredient name. If that ingredient

manufacturer has not previously supplied supporting data to the program, the registrant must supply that documentation.

If you have any questions, please contact our office at (916) 900-5022.

Sincerely,

Dale M. Woods, Ph.D.

Environmental Program Manager