

USDA NOP Communication from February, 20th 2009

We would like to inform all clients with activities in the area of organic agricultural production that the liquid fertilizer inputs

Marizyme™

Agrolizer™

Both previously produced by Port Organic, Ltd **may not be used anymore**. The NOP has informed all Accredited Certifying Agents it has reason to believe that these inputs are not in compliance with the NOP.

**IMO has no registered client using any of these products** but the information is passed to all clients as a service and to prevent any problems for clients possibly evaluating use of these products.

However, NOP announced several other changes with regard to the use of high-nitrogen content liquid fertilizers (nitrogen content above 3%)

We would like to inform you all about the most important of these changes.

- By October 1<sup>st</sup> 2009 approval of all high nitrogen liquid fertilizer (Nitrogen analysis above 3%) must be accompanied by documents confirming their compliance with the NOP (3<sup>rd</sup> party review, 3<sup>rd</sup> party inspection). Any input not fulfilling this requirement **will not be** approved and its use after this date will seriously jeopardize the certification of the client.
- By October 1<sup>st</sup> 2009 all parties conducting 3<sup>rd</sup> party reviews for inputs regarding compliance with the NOP will need a system of audit and inspection to be recognized as a 3<sup>rd</sup> party reviewer by the NOP. All 3<sup>rd</sup> party reviewers will need to undergo audits by the NOP as a condition for on-going recognition by the NOP. (IMO offers such a service for inspection of inputs and is also regularly audited by the NOP)

The criteria for Fertilizer Manufacturers products to be approved include:

- No evidence of fraud in formulation, including the presence of all necessary infrastructure to produce the approved finished product. This includes: dry and liquid storage, all necessary conveyance (forklifts, trucks, piping, etc), finished product storage, and both the ingredient and finished product transportation infrastructure.
- Verification of no synthetic nitrogen equipment, tanks or supplies within 100 yards of the facility that produces the organic approved inputs at any time of the year; and
- Verification that a successful audit was conducted comparing incoming materials with outgoing finished products and complete, detailed explanations for any deviations.

At the same time IMO wishes to inform clients that the basis for an approval of bought-in inputs are also the operation's responsibilities under the NOP soil fertility and crop nutrient management practice standard §205.203:

- Producers must select and implement practices to maintain and improve the condition of soil and minimize soil erosion.
- Further, producers must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials.
- Finally, producers must manage plant and animal materials to maintain or improve soil organic matter content. The management of plant and animal materials must be done in a manner that does not contribute to contamination of crops, soil or water.

In case of any doubts regarding this notice or future action, please don't hesitate to contact your desk officer at IMO.