

Bat Guano and Seabird Guano Labeling Aids

1. Bat Guano:

In order to use the term “bat guano”, one of the following (A or B) is required:

- A. Laboratory analysis for the bat guano ingredient ('as is' basis) which includes values for total organic matter, total nitrogen (N), and available phosphate (P₂O₅).
 - Organic matter content should be greater than 40%.
 - Nitrogen should be present.
 - Available phosphate should not exceed 6%.
- B. If you repackage a product that is registered with the program and the bat guano supplier or manufacturer has fulfilled the requirement in A, provide the invoice to confirm the registered product was purchased.

Label claims

- “Fossilized bat guano” is not an acceptable term, as this claim cannot be verified.
- Labels that specify the origin of the bat guano must provide proof of that claim.

Note: At the Department’s discretion, the program may further test the bat guano ingredient for bat DNA.

~Also refer to CDFA’s bat guano notice to industry, located at the end of this labeling aid.

2. Seabird Guano

In order to use the term “seabird guano”, one of the following (A or B) is required:

- A. Laboratory analysis for the seabird guano ingredient ('as is' basis), which includes values for total organic matter, total nitrogen (N), and available phosphate (P₂O₅).
 - Organic matter content should be greater than 40%.
 - Nitrogen should be present.
 - Available phosphate should be present.
- B. If you repackage a product that is registered with the program and the seabird guano supplier or manufacturer has fulfilled the requirement in A. provide the invoice to confirm the registered product was purchased.

Label claims

- “Fossilized seabird guano” or “mined seabird guano” are not acceptable terms, as this claim cannot be verified.
- Labels that specify the origin of the seabird guano must provide proof of that claim.

Note: At the Department's discretion, products submitted for registration as seabird guano may require an analysis for avian DNA prior to registration. The program may also conduct DNA analysis of products in the channels of trade.

~Also refer to CDFA's seabird guano notice to industry, located at the end of this labeling aid.

Rev 02.07.2025



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 (P_2O_5).
- 2) 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 (P_2O_5) of the product.
- 3) 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.
- 4) Labels that specify the origin of the bat guano must provide proof of that claim.
- 5) Fossilized bat guano is not an acceptable term on fertilizing material labels.
- 6) 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,

ORIGINAL SIGNED BY DALE WOODS

Dale M. Woods, Ph.D.
Environmental Program Manager





September 1, 2022

Notice to Fertilizing Material Licensees Use of the Term “Seabird Guano” on Fertilizing Material Labels

Dear Fertilizing Materials Licensee:

Seabird guano has a history of use within fertilizing material products. To ensure uniform labeling in California and provide accurate representation to consumers, the Fertilizing Materials Inspection Program will be implementing standards for labeling of seabird guano. Beginning January 1, 2023, all new labels must meet the updated definition. For registration renewals of seabird guano-containing products, firms must provide supporting documents at the next renewal. Label changes must be submitted and approved during your firm's next renewal cycle and must be fully implemented in the channels of trade by the subsequent renewal cycle.

As of January 1, 2023:

- 1) To be registered for distribution in California, products claiming to contain seabird guano must comply with the following definition:
“Seabird guano is the fecal excrement from marine birds. Seabird guano has an organic matter content greater than 40%, is a source of nitrogen (N) and available phosphoric acid (P₂O₅).”
- 2) Registration application for any product claiming seabird guano must provide:
 - a. Documentation of the seabird guano supplier (invoice or proof of purchase);
 - b. Laboratory analysis of the seabird guano that includes total organic matter content, total nitrogen (N) and available phosphoric acid (P₂O₅).
- 3) Labels that specify the origin of the seabird guano must provide proof of that claim.
- 4) “Fossilized seabird guano” or “mined seabird guano” are not acceptable terms on fertilizing material labels. If the material meets the definition, it should be labeled as “seabird guano.”
- 5) If a seabird guano ingredient supplier has not provided the supporting data to the program, the product guarantor is responsible for providing that documentation.
- 6) At the Department's discretion, products submitted for registration as seabird guano may require an analysis for avian DNA prior to registration. The program may also conduct DNA analysis of products in the channels of trade.

If you have any questions, please contact our office at fertilizer@cdfa.ca.gov or (916) 900-5022.

Sincerely,

ORIGINAL SIGNED BY NICK YOUNG

Nick Young
Environmental Program Manager

