Organic Input Materials (OIM) Licensing, Registration, & Labeling Guide

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Introduction

The Feed, Fertilizer, & Livestock Drugs Regulatory Services (FFLDRS) Branch of the Inspection Services Division manages a comprehensive fertilizing materials program that licenses individuals or companies who manufacture or distribute fertilizing materials, and registers labels for fertilizing materials that are sold or distributed into California.

This guide will assist firms and interested parties with the application process for Organic Input Materials (OIM) and provide them with a better understanding of the review and analysis undertaken by FFLDRS. This guide is applicable to Organic Input Materials (intended for use in organic crop and organic food production); for guidance on materials intended for conventional use, refer to the Conventional Fertilizing Materials Licensing, Registration, & Labeling Guide. This guide is designed to address many of the common pitfalls and questions regarding label registration and save you months of valuable time and costly label revisions. Look for the italicized segments for helpful notes, but always refer to the Fertilizing Materials Law and Regulations for the entire licensing, registration, and labeling requirements. All the information presented here is also available on our website at: https://www.cdfa.ca.gov/is/ffldrs/fertilizer_OIM.html.

Organic Input Material (OIM) - Defined in Section 14550.5 of the Food and Agricultural Code, "means any bulk or packaged commercial fertilizer, agricultural mineral, beneficial substance, or specialty fertilizer, excluding pesticides, that is to be used in organic crop and food production and that complies with the requirements of the National Organic Program standards, as specified in Part 205 (commencing with Section 205.1) of Subchapter M of Chapter I of Subtitle B of Title 7 of the Code of Federal Regulations."

Purpose of Licensing and Registering Labels for Fertilizing Materials

The purpose of this program is to:

- Promote the distribution of effective and safe fertilizing materials.
- Provide assurance to consumers that the products they purchase are properly identified, and the quality and quantity represented is valid.

Law and Regulations

The Fertilizing Materials Law and Regulations can be found in PDF format on our website at:

https://www.cdfa.ca.gov/is/regulations.html

FFLDRS Online ExtraView Database

The online ExtraView Database is the official database for the Feed, Fertilizer, and Livestock Drugs Regulatory Services Branch. Through the database, firms and individuals may apply for and manage fertilizer licenses and registrations; calculate and pay required mill assessments and submit tonnage reports; and view correspondence from registration staff.

To enroll, visit the database at: https://inspect.cdfa.ca.gov/ and click "Enroll New User".

Video instructions on how to navigate the ExtraView Database are available at: https://www.cdfa.ca.gov/is/ffldrs/index.html.

This page includes tutorials on how to:

- Enroll as a New User
- Apply for a new Fertilizing Materials License
- Apply for a new Product Registration
- Pay for Items
- Renew Product Registrations or Licenses

Fertilizer Product Database

The online Fertilizer Product Database is available for the public to view the status of fertilizing material products that are registered or submitted for registration with the Fertilizing Materials Inspection Program. This database also provides product information, such as Guaranteed Analysis, Heavy Metals, and Annotations for use, if applicable.

The database is available at: https://apps1.cdfa.ca.gov/fertilizerproducts/

Fertilizer Program Workshop

The Fertilizing Materials Inspection Program holds a yearly workshop at various locations throughout the state of California to assist applicants with licensing, registration, the product database, and reporting form completion. Information on the workshop date, location, and registration will be available approximately three months before the workshop on the website: https://www.cdfa.ca.gov/is/ffldrs/fertilizer.html

Licensing for Fertilizing Materials

An individual or company who manufactures or distributes fertilizing materials in California shall, before they engage in the activity, obtain a Fertilizing Materials License for each plant and business location that they operate. The most expedient method to submit a license application is via the online ExtraView Database at: https://inspect.cdfa.ca.gov/.

A printable license application is also available on the FFLDRS website at: https://www.cdfa.ca.gov/is/docs/LicenseApplication_513-020.pdf

Please note: Any business or manufacturing location in California, other U.S. states, or another country, which manufacture or distribute fertilizing materials directly into California, or appear on the product label, must obtain a license from California.

A fertilizing materials license is valid for a two-year period from January 1st of each odd-numbered year to December 31st of the next even-numbered year. Licensing fees are not pro-rated.

License Application Procedures

APPLICANT

1. Complete online ExtraView database license application or paper license application
2. Pay the license fee - $100

LICENSING DESK

1. Receives application from ExtraView or CDFA's Cashier
2. Enters information into ExtraView
3. Reviews for completeness

LICENSE REVIEWED

1. If incomplete, notifies the firm
    a. Response from Firm goes back to review with the Licensing Desk
2. If complete, approves license
    a. Issues License and sends notification to firm with information on mill assessment requirements and tonnage reporting

Please Note: If your mailing address is a P.O. Box and you have another business location in the same city, you must obtain a license for the physical business location in that city. If your mailing address is a P.O. Box and you do NOT have a business location in that city, then please clarify in writing that there is no business location in the city with the P.O. Box. For example: If Company A operates out of Fresno, but has mail sent to a P.O. Box in Madera, then Company A should license the Fresno location and clarify in writing for FFLDRS that, "There are no business locations in Madera. This is a mailing address only."

License Renewal

The renewal fee is $100 per business location. Renewals are considered delinquent if received after January 31st and assessed a $50 penalty. If the renewal remains delinquent past February 28th, of the odd-numbered year, then a penalty of $100 per location is assessed.

Registration of OIM Product Labels

Before any OIM fertilizing materials may be sold or distributed in California, the product label must be approved by the FFLDRS Organic Input Material Program. All fertilizing materials intended for use in organic crop and organic food production, as listed in this guide, require registration. Registration is meant to ensure that the product composition complies with the USDA NOP standards. The product label is reviewed to ensure that it complies with the Fertilizing Materials Law and Regulations. The most expedient method to submit a registration application is via the online ExtraView Database at: https://inspect.cdfa.ca.gov/. A printable registration application is also available at: https://www.cdfa.ca.gov/is/docs/OIM_RegistrationApp_513-026.pdf

Fertilizing materials registration is valid for a four-year period. For registration schedules, see section 2320.1(b) of the California Code of Regulations.

Product Label Registration Procedures

APPLICANT:

1. Apply for a fertilizing materials license (if not currently licensed)
2. Complete an ExtraView online database registration application or paper application (OIM-001)
3. Include one 8 ½ x 11 copy of each product label
4. Pay the registration fee - $1,000 for each product label to be registered
5. Provide appropriate data (Efficacy, MSDS, Analytical, etc…) to support label claims

6. Complete forms OIM-0002, OIM-0010, OIM-0013
7. Describe the manufacturing process of the final product
8. Describe the manufacturing process for each ingredient
9. Provide an invoice or weight ticket for each ingredient
10. Provide any alternate formulation, including alternate ingredient suppliers.

REGISTRATION DESK:

1. Evaluates submitted documents in order of receipt
2. Reviews submission for completeness
3. Verifies compliance with laws and regulations
4. Verifies compliance with USDA NOP standards
5. Ensures claims, data, and information are valid

All documentation and final label reviews are performed by at least two CDFA staff

If registration application is incomplete

1. Correspondence is sent to the firm via email or paper letter asking for further data and/or revisions and re-submission within 180 days. A new registration is required after 180 days if a re-submission is not fulfilled.

If scientific evaluation is required, the Data Review Specialist:

1. Reviews data in support of claims and ingredients
2. May consult with experts at the University of California
3. May request additional data or revisions

If the registration application is complete, issue registration

1. Product is now approved for sale/distribution in California
2. Certificate of Registration is available via ExtraView
3. An electronic version of the CDFA OIM logo is available for display on the product label

Please note: Any changes/updates made to the registered label must be reviewed and approved before the product bearing the amended label can be sold or distributed in California. Changes to the guaranteed analysis, derivation statement, name of product, list of ingredients, or active ingredient statement require a new submission for registration. The OIM registration update form (OIM-0031) is available online at: https://www.cdfa.ca.gov/is/ffldrs/pdfs/OIM-0031_RegistrationUpdateForm.pdf

Four-Year Registration Renewal for OIM Products

The renewal fee is $1,000 per product label. Renewals are considered delinquent if not received within one calendar month from the beginning of the designated group registration cycle; such delinquent registrations will be assessed a $50 penalty and will not be granted provisional status. If there are no substantive label changes or formula changes to a non-delinquent renewal, provisional registration status will be granted for up to six months while the program completes registration review.

Renewal documents are available at: https://www.cdfa.ca.gov/is/ffldrs/fertilizer_OIM.html. Under **OIM Forms**, select 'OIM Renewal Documents.'

Renewal with No Changes
If no modifications have been made to the product, label, suppliers, or manufacturing process:

Complete the OIM Renewal Documents:

1. Organic Input Material Registration Renewal – Form OIM-0011
2. Organic Input Material Renewal Formula Sheet – Form OIM-0034
3. Provide Invoices / Proof of raw material purchases
4. Provide Appropriate data, if any (e.g., current non-nutritive (heavy) metals analysis, current pathogen analysis, current pH analysis, etc.)

Submit the completed documents using the online ExtraView database.

Renewal with Changes
Any change to the product name, guarantees, or ingredients requires registration as a new product. For other modifications made to the product, label, suppliers, or manufacturing process:

Complete the OIM Renewal Documents:

1. Organic Input Material Registration Renewal – Form OIM-0011
2. Organic Input Material Renewal Formula Sheet – Form OIM-0034, updated as appropriate
3. Provide Recent Invoices / Proof of raw material purchases for the previously approved ingredients

In addition:

4. Provide appropriate data, if any (e.g., supporting data for new ingredients or updated non-nutritive (heavy) metals analysis)
5. Describe ANY changes in the manufacturing process of the final product
6. Describe the manufacturing process for each new, changed, or alternately sourced ingredient
7. Provide an invoice or weight ticket for each new, changed, or alternately sourced ingredient
8. Provide any alternate formulations, including alternate ingredient suppliers

Submit the completed documents using the online ExtraView database.

Specific labeling requirements for Organic Input Materials (OIM):

OIM - Commercial Fertilizers

Defined in Section 14522 of the Food and Agricultural Code, “means any substance which contains 5 percent or more of nitrogen (N), available phosphoric acid (P2O5), or soluble potash (K2O), singly or collectively, which is distributed in this state for promoting or stimulating plant growth.”

Please note: Commercial fertilizer is only intended for agricultural or professional use. This includes agricultural production, golf course maintenance, or commercial landscaping. If it is also marketed for home and garden use, then it classifies as a specialty fertilizer (see next page) and should be registered as such. All OIM commercial fertilizers require registration, regardless whether packaged or bulk.

The following is required on a commercial fertilizer label, as specified in the California Code of Regulations (CCR) Section 2303:

1. **Product name** *(The name should be unique and not be misleading as to the purpose and guarantees)*
2. **Measurement**
    a. Net weight *(for dry materials, U.S. & metric units)*
    b. Volume *(for liquid materials, U.S. & metric units)*
    c. Density *(lbs/gallon at 68º Fahrenheit- only for bulk liquids >110lbs).*
3. **Grade** *(Shall exactly match the guaranteed analysis for N-P-K)*
4. **Licensee’s name and address** *(If both manufacturer and distributor are given, state “Guaranteed by:” in front of the name of the firm acting as the licensed guarantor)*
5. **Guaranteed analysis** *(required format, terminology, and order shown on next page)*
6. **Derivation Statement** *(required format and restrictions shown on next page)*

Heavy metals: The Fertilizing Materials Law and Regulations include standards for heavy metals. These regulations are found in Sections 2302 and 2303(s) of the CCR. The regulations set limits on arsenic, cadmium, and lead, and require that in lieu of a statement on the label, each product guaranteeing **iron, manganese, zinc, or phosphates derived from inorganic sources** shall contain either the statement, “Information regarding the contents and levels of metals in this product is available by calling 1-800-XXX-XXXX,” or the statement, “Information regarding the contents and levels of metals in this product is available on the internet at http://www.regulatory-info-xx.com.”

Please note: The best (most uniform among all states) method for addressing heavy metals compliance is to state, “Information regarding the contents and levels of metals in this product is available on the internet at https://www.aapfco.org/metals.html” If this method is used, submit a chemical analysis reported within 5 years, at registration to FFLDRS for ALL of the following metals: Arsenic (As), Cadmium (Cd), Cobalt (Co), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), and Selenium (Se). This proactive action may save you months of valuable time and costly label revisions. If the analysis is more than 5 years old at renewal, you must submit new analytical results.

The guaranteed analysis will use the following format, terminology, and order presented: ***(Please note: Zero guarantees should not be made on the label and guarantees below the secondary and micronutrient guarantee minimums shown in the right column, below, should not be made unless they are exempt per Section 2307 of the CCR. If mention is made of a fertilizing material outside of the guaranteed analysis, a guarantee should be given for that material. For example: If a label guarantees values for magnesium and iron, but not sulfur, and then mentions the benefits of sulfur on the label, a value for sulfur should be guaranteed.)***

Guaranteed Analysis:	(Guarantee minimums, if claimed)
Total Nitrogen (N) ..... X%	
X% Ammoniacal Nitrogen	
X% Nitrate Nitrogen	
X% Water Soluble Nitrogen	
X% Water Insoluble Nitrogen	
Available Phosphoric Acid (P_2O_5) .....X%	(or, Available Phosphate (P_2O_5))
Soluble Potash (K_2O) .....X%	
Calcium (Ca) ..... X%	1.0000%
Magnesium (Mg) ..... X%	0.5000%
Sulfur (S)..... X%	1.0000%
Boron (B) ..... X%	0.0200% ------**If B ≥ 0.1%, add**
Chlorine (Cl)..... X%	0.1000% **WARNING, per Section**
Cobalt (Co)..... X%	0.0005% **2300 (h) of the CCR.**
Copper (Cu) ..... X%	0.0500%
X% Chelated Copper *(If guaranteed)*	Give chelating agent in derivation statement.
Iron (Fe)..... X%	0.1000%
X% Chelated Iron *(If guaranteed)*	Give chelating agent in derivation statement.
Manganese (Mn)..... X%	0.0500%
X% Chelated Manganese *(If guar.)*	Give chelating agent in derivation statement.
Molybdenum (Mo)..... X%	0.0005% ------If Mo ≥ 0.001%, add
Sodium (Na) ..... X%	0.1000% WARNING, per Section
Zinc (Zn)..... X%	0.0500% 2300 (i) of the CCR.
X% Chelated Zinc *(If guaranteed)*	Give chelating agent in derivation statement.

Please note that the sum of the guaranteed forms of nitrogen must equal the total nitrogen guarantee.

Derived from: … list the ingredient sources for the above guarantees. Abbreviated chemical names, trade names, and trademarks are prohibited from the derivation statement.) **The derivation statement must immediately follow the last nutrient guarantee.**

OIM - Specialty Fertilizers

Defined in Section 14563 of the Food and Agricultural Code, "means packaged commercial fertilizer labeled for home gardens, lawns, shrubbery, flowers, and other similar noncommercial uses. These products may contain less than 5 percent nitrogen (N), available phosphoric acid (P_2O_5), or soluble potash (K_2O), singly or collectively, detectable by chemical methods."

The following is required on a specialty fertilizer label, as specified in CCR Section 2303:

1. **Product name** *(The name should be unique and not be misleading as to the purpose and guarantees).*
2. **Measurement**
    a) **Net weight** *(for dry materials, U.S. & metric units)*
    b) **Volume** *(for liquid materials, U.S. & metric units)*
    c) **Density** *(lbs/gallon at 68º Fahrenheit- only for bulk liquids >110lbs).*
3. **Grade** *(Shall exactly match the guaranteed analysis for N-P-K)*
4. **Licensee's name and address** *(If both manufacturer and distributor are given, state "Guaranteed by:" in front of the name of the firm acting as the licensed guarantor)*
5. **Purpose of product** *(Should not be misleading as to the guarantees)*
6. **Directions for use** *(Should be for the specific product)*
7. **Guaranteed analysis** *(required format, terminology, and order shown on next page)*
8. **Derivation Statement** *(required format and restrictions shown on next page)*

Heavy metals: The Fertilizing Materials Law and Regulations include standards for heavy metals. These regulations are found in Sections 2302 and 2303 (s) of the CCR. The regulations set limits on arsenic, cadmium, and lead, and require that in lieu of a statement on the label, each product guaranteeing **iron, manganese, zinc, or phosphates derived from inorganic sources** shall contain either the statement, "Information regarding the contents and levels of metals in this product is available by calling 1-800-XXX-XXXX," or the statement, "Information regarding the contents and levels of metals in this product is available on the internet at http://www.regulatory-info-xx.com."

Please note: The best (most uniform between all states) method for addressing heavy metals compliance is to state, "Information regarding the contents and levels of metals in this product is available on the internet at https://www.aapfco.org/metals.html" If this method is used, submit a chemical analysis reported within 5 years, at registration, to FFLDRS for ALL of the following metals: Arsenic (As), Cadmium (Cd), Cobalt (Co), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), and Selenium (Se). This proactive action may save you months of valuable time and costly label revisions. If the analysis is more than 5 years old at renewal, you must submit new analytical results.

The N, P, and K percentages can be any value. The key distinction is the product is intended for home and garden use.

OIM - Specialty Fertilizers, continued

The guaranteed analysis will use the following format, terminology, and order presented: (Please note: Zero guarantees should not be made on the label and guarantees below the secondary and micronutrient guarantee minimums shown in the right column, below, should not be made, unless they are exempt per Section 2307 of the CCR. If mention is made of a fertilizing material outside of the guaranteed analysis, a guarantee should be given for that material. For example: If a label guarantees values for magnesium and iron, but not sulfur, and then mentions the benefits of sulfur on the label, a value for sulfur should be guaranteed.)

Guaranteed Analysis:	(Guarantee minimums, if claimed)
Total Nitrogen (N) ..... X%	
X% Ammoniacal Nitrogen	**Please note that the sum of the guaranteed forms of nitrogen must equal the total nitrogen guarantee.**
X% Nitrate Nitrogen	
X% Water Soluble Nitrogen	
X% Water Insoluble Nitrogen	
Available Phosphoric Acid (P_2O_5) .....X%	(or, Available Phosphate (P_2O_5))
Soluble Potash (K_2O) .....X%	1.0000%
Calcium (Ca) ..... X%	0.5000%
Magnesium (Mg) ..... X%	1.0000%
Sulfur (S)..... X%	0.0200% ------**If B ≥ 0.1%, add**
Boron (B) ..... X%	0.1000% **WARNING, per Section**
Chlorine (Cl)..... X%	0.0005% **2300 (h) of the CCR.**
Cobalt (Co)..... X%	0.0500%
Copper (Cu) ..... X%	Give chelating agent in derivation statement.
X% Chelated Copper *(If guaranteed)*	0.1000%
Iron (Fe)..... X%	Give chelating agent in derivation statement.
X% Chelated Iron *(If guaranteed)*	
Manganese (Mn) ..... X%	0.0500%
X% Chelated Manganese *(If guar.)*	Give chelating agent in derivation statement.
Molybdenum (Mo)..... X%	0.0005% ------**If Mo ≥ 0.001%, add**
Sodium (Na) ..... X%	0.1000% **WARNING, per Section**
Zinc (Zn)..... X%	0.0500% **2300 (i) of the CCR.**
X% Chelated Zinc *(If guaranteed)*	Give chelating agent in derivation statement.

Derived from: … list the ingredient sources for the above guarantees. Abbreviated chemical names, trade names, and trademarks are prohibited from the derivation statement.) **The derivation statement must immediately follow the last nutrient guarantee.**

OIM - Agricultural Minerals

Defined in Section 14512 of the Food and Agricultural Code, "means any substance with nitrogen (N), available phosphoric acid (P_2O_5), and soluble potash (K_2O), singly or in combination, in amounts less than 5 percent, which is distributed for Agricultural or Professional use, or any substance only containing recognized essential secondary nutrients or micronutrients in amounts equal or greater than minimum amounts specified by the secretary, by regulation, and distributed in this state as a source of these nutrients for the purpose of promoting plant growth. It shall include gypsum, liming materials, manure, wood fly ash, sewage sludge not qualifying as commercial fertilizer, and captured dilute solutions."

Please note: All OIM Agricultural Minerals require registration, regardless whether packaged or bulk.

If secondary and micronutrients are claimed, the label shall guarantee values equal to or above specified minimums for all claimed nutrients. Acceptable secondary and micronutrients are: calcium, magnesium, sulfur, boron, chlorine, cobalt, copper, iron, manganese, molybdenum, sodium, and zinc.

The following is required as specified in CCR Section 2303 on an agricultural mineral label:

1. **Product name** *(The name should be unique and not be misleading as to the purpose and guarantees)*
2. **Measurement**
    a. **Net weight** *(for dry materials, U.S. & metric units)*
    b. **Volume** *(for liquid materials, U.S. & metric units)*
    c. **Density** *(lbs/gallon at 68º Fahrenheit - only for bulk liquids >110lbs).*
3. **Licensee's name and address** *(If both manufacturer and distributor are given, state "Guaranteed by:" in front of the name of the firm acting as the licensed guarantor)*
4. **Purpose of product** *(Should not be misleading as to the guarantees) (packaged only)*
5. **Directions for use** *(Should be for the specific product) (packaged only)*
6. **Guaranteed analysis** *(required format, terminology, and order shown on next page)*
7. **Derivation Statement** *(required format and restrictions shown on next page)*

Heavy metals: The Fertilizing Materials Law and Regulations include standards for heavy metals. These regulations are found in Sections 2302 and 2303 (s) of the CCR. The regulations set limits on arsenic, cadmium, and lead, and require that in lieu of a statement on the label, each product guaranteeing **iron, manganese, zinc, or phosphates derived from inorganic sources** shall contain either the statement, "Information regarding the contents and levels of metals in this product is available by calling 1-800-XXX-XXXX," or the statement, "Information regarding the contents and levels of metals in this product is available on the internet at http://www.regulatory-info-xx.com."

Please note: The best (most uniform among all states) method for addressing heavy metals compliance is to state, "Information regarding the contents and levels of metals in this product is available on the internet at https://www.aapfco.org/metals.html" If this method is used, submit a chemical analysis reported within 5 years, at registration, to FFLDRS for ALL of the following metals: Arsenic (As), Cadmium (Cd), Cobalt (Co), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), and Selenium (Se). This proactive action may

save you months of valuable time and costly label revisions. If the analysis is more than 5 years old at renewal, you must submit new analytical results.

The guaranteed analysis will use the following format, terminology, and order presented: ***(Please note: Zero guarantees should not be made on the label and guarantees below the secondary and micronutrient guarantee minimums shown in the right column, below, should not be made, unless they are exempt per Section 2307 of the CCR. If mention is made of a fertilizing material outside of the guaranteed analysis, a guarantee should be given for that material. For example: If a label guarantees values for magnesium and iron, but not sulfur, and then mentions the benefits of sulfur on the label, a value for sulfur should be guaranteed.)***

Guaranteed Analysis:	(Guarantee minimums, if claimed)
Total Nitrogen (N) ..... X%	
X% Ammoniacal Nitrogen	**Please note that the sum of the guaranteed forms of nitrogen must equal the total nitrogen guarantee.**
X% Nitrate Nitrogen	
X% Water Soluble Nitrogen	
X% Water Insoluble Nitrogen	
Available Phosphoric Acid (P_2O_5).....X%	(or, Available Phosphate (P_2O_5))
Soluble Potash (K_2O) .....X%	1.0000%
Calcium (Ca) ..... X%	0.5000%
Magnesium (Mg) ..... X%	1.0000%
Sulfur (S)..... X%	0.0200% ------**If B ≥ 0.1%, add**
Boron (B) ..... X%	0.1000% **WARNING, per Section**
Chlorine (Cl)..... X%	0.0005% **2300 (h) of the CCR.**
Cobalt (Co)..... X%	0.0500%
Copper (Cu) ..... X%	Give chelating agent in derivation statement.
X% Chelated Copper *(If guaranteed)*	
Iron (Fe).....X%	0.1000%
X% Chelated Iron *(If guaranteed)*	Give chelating agent in derivation statement.
Manganese (Mn) .....X%	0.0500%
X% Chelated Manganese *(If guar.)*	Give chelating agent in derivation statement.
Molybdenum (Mo)..... X%	0.0005% ------**If Mo ≥ 0.001%, add**
Sodium (Na) ..... X%	0.1000% **WARNING, per Section**
Zinc (Zn) ..... X%	0.0500% **2300 (i) of the CCR.**
X% Chelated Zinc *(If guaranteed)*	Give chelating agent in derivation statement.

Derived from: … list the ingredient sources for the above guarantees. Abbreviated chemical names, trade names, and trademarks are prohibited from the derivation statement.) **The derivation statement must immediately follow the last nutrient guarantee.**

OIM - Beneficial Substances

Defined in Section 14513 of the Food and Agricultural Code, "means any substance or compound, other than primary plant nutrients, secondary plant nutrients, and micronutrients, and excluding pesticides, that can be demonstrated by scientific research to be beneficial to one or more species of plants, soil, or media. A beneficial substance includes, but is not limited to, plant biostimulants."

Section 14555.5 of the Food and Agricultural Code defines "Plant biostimulant" as "a substance or microorganism, or mixtures thereof, that, when applied to seeds, plants, the rhizosphere, soil, or other growth media, act to support a plant's natural nutrition processes independently of the biostimulant's nutrient content. The plant biostimulant thereby may improve nutrient availability, uptake, or use efficiency, tolerance to abiotic stress, and consequent growth, development, quality, or yield."

A. OIM Beneficial Substance - Chemical/Biological

The following is required as specified in CCR Section 2303 on a beneficial substance label:

1. **Product name** *(The name should be unique and not be misleading as to the purpose and guarantees)*
2. **Measurement**
    a. **Net weight** *(for dry materials, U.S.& metric units)*
    b. **Volume** *(for liquid materials, U.S. & metric units)*
    c. **Density** *(lbs/gallon at 68° Fahrenheit - only for bulk liquids >110lbs).*
3. **Licensee's name and address** *(If both manufacturer and distributor are given, state "Guaranteed by:" in front of the name of the firm acting as the licensed guarantor)*
4. **Purpose of product** *(Should not be misleading as to the guarantees)*
5. **Directions for use** *(Should be for the specific product)*
6. **The statement "CONTAINS BENEFICIAL SUBSTANCE (S)"**
7. **A statement of composition** *(This should show the amount of each ingredient, which is the agent in a product primarily responsible for the intended effects, as noted below.)*

CONTAINS BENEFICIAL SUBSTANCE(S)

Name of beneficial substance	*% (or acceptable units)*
Species of microorganism	*viable CFU/cm3, /mL, /g, or other acceptable units*

Examples:

Humic Acids derived from (list the source of the humic acids e.g. leonardite) …….X%
(Please note: The only claim we allow for Humic Acids is "may increase micronutrient uptake.")
Soluble Silicon (Si) derived from *(soluble silicon source is optional)* …….*X%*
Wetting Agent *(Provide exact chemical name on the label)* …….X%
Surfactants *(Provide exact chemical name on the label) ..... X%*
Soil Penetrants *(Provide exact chemical name on the label)..... X%*
Sugars *(Specify sugar)* (microbe food).....X%
(Please note: The only purpose allowed for Sugars under this heading is "microbe food", which must be stated as presented.)

Yucca schidigera …… X%

OIM Beneficial Substance - Chemical/Biological, continued

If biotics are guaranteed, FFLDRS requires the following additional information per Section 2304 of the CCR:

1. **Species name of each microorganism, name of each enzyme, or organism by-product, if claimed, as part of the statement of composition.** *(Provide the full name, not abbreviations)*
2. **Active Ingredients:**
   a. **Microorganisms: number of viable units per mL or g.** *(e.g. 100 CFU/mL)*
   b. **Enzymes: concentration in activity units per mL or g.** *(e.g. 100 u/mL)*
   c. **Organism by-product: concentration in percentage by weight.** *(e.g. 10%)*
3. **Expiration date** *(You may leave a space noted by "Expiration date:___" where the actual date will be stamped or printed later)*
4. **Storage conditions**
5. Submit a **written description of a generally accepted laboratory method** for assaying the identity and the quantity of the viable and attenuated units and the by-products claimed with the registration application.

6. Submit a **laboratory analysis or alternate methods** verifying the microbial guarantees. The analytical results shall be no more than five (5) years old at the time of registration/renewal approval.

Please note: If added to a commercial fertilizer, specialty fertilizer or agricultural mineral, the following format shall appear below the derivation statement:

ALSO CONTAINS BENEFICIAL SUBSTANCE(S)

Humic Acids derived from *(list the source of the humic acids, e.g. leonardite)*	*X%*
Wetting Agent *(Provide exact chemical name for our records only)*	*…X%*
Surfactants *(Provide exact chemical name for our records only)*	*… X%*
Soil Penetrants *(Provide exact chemical name for our records only)*	*… X%*
Biotic Guarantees	
(Not a complete list)	

B. OIM Beneficial Substance – Physical

For beneficial substances intended to condition soils solely through physical means, in lieu of a statement of ingredient composition as required in 2303(g) or (k), the label shall include a list of non-nutritive ingredients in decreasing amounts present.

(1) This includes, but is not limited to:
   (A) Hay, straw, peat moss, leaf mold, sand, gravel, coir, humus, rice hulls, perlite, vermiculite, wood products, and biochar.
   (B) Manures, meals, mulches, and composts without guarantees for plan nutrients.
   (C) Any product or mixture of products intended for use as a potting medium, planting mix, or soilless growing media.

OIM Beneficial Substance - Physical, continued

(Please note: All OIM beneficial substances require registration, regardless whether packaged or bulk.

The following is required as specified in CCR Section 2303 on a beneficial substance label:

1. **Product name** *(The name should be unique and not be misleading as to the purpose and list of ingredients)*
2. **Measurement** (volume) *(U.S. & metric)*
3. **Licensee's name and address** *(If both manufacturer and distributor are given, state "Guaranteed by:" in front of the name of the firm acting as the licensed guarantor)*
4. **Purpose of product** *(Should not be misleading as to the guarantees)*
5. **Directions for use** *(Should be for the specific product)*
6. **A list of ingredients** *(Shall be in order of decreasing amounts present)*

Please note: If a WETTING AGENT/TACKIFIER is included in the list of ingredients, FFLDRS requires the exact chemical name of the wetting agent and/or tackifier on the registration application or in another form of writing. The exact name is not required on the product label, "wetting agent/tackifier," is acceptable on the label. If submitted in accordance with CCR Sections 2300.2 and 2300.3, the name shall be kept confidential.

Plant Biostimulant Claims

Beginning January 1, 2025, "plant biostimulant" claims will be permitted on labeling in some instances. Labeling may claim "plant biostimulant," but not the abbreviated and undefined term of "biostimulant".

At present time, the only fertilizing materials permitted to make "plant biostimulant" claims must include humic acid, seaweed extract and/or kelp extract as ingredients.

The only additional allowed plant biostimulant labeling claims include:

- (Product name or humic acid/seaweed extract/kelp extract ingredient) acts to support a plant's natural nutrition process.
- Humic acid may aid in the uptake of micronutrients.
- Seaweed extract (or kelp extract) is a food source for microorganisms.
    - o Seaweed extract (or kelp extract) subsequently enhances microbial growth. (This claim must be accompanied by the microbe food claim.)

Misbranding and Adulteration

Per Article 12, Section 14681 of the Food and Agricultural Code, no person shall distribute misbranded fertilizing materials. A fertilizing material shall be deemed misbranded under any of

the following conditions:
(a) If its labeling is false or misleading in any particular way.
(b) If it is distributed under the name of another fertilizing material.
(c) If it is not labeled as required by regulations adopted pursuant to this chapter.
(d) If it purports to be, or is represented as, a fertilizing material, or is represented as containing a primary or secondary plant nutrient or micronutrients, or both, unless the plant nutrients conform to the definition of identity, if any, prescribed by regulation. In adopting these regulations, due regard shall be given to commonly accepted definitions and official fertilizer terms such as those prescribed by the Association of American Plant Food Control Officials.

Unacceptable Terms and Claims

There are no official definitions for the terms **Balanced**, and **Complete**. They are considered misleading and are not allowed on fertilizing material labels. Refer to Section 14681(a) of the Food and Agricultural Code.

Presently, the Department does not allow guarantees for **Fulvic acids** or **Organic acids** on labeling of fertilizing materials.

Note: This should not be considered a complete list of unacceptable terms, claims, or guarantees.

Frequently Asked Questions and Answers

Do all fertilizing materials for agricultural use require registration?

All fertilizing materials intended as an OIM product require registration. This includes products that do not require registration as conventional products; such as packaged and bulk commercial fertilizers, bulk agricultural minerals, and bulk beneficial substances-physical.

Are the registration fees refundable?

No. Registration fees are product label review fees and are neither refundable nor prorated. Overpayments will be refunded.

If I distribute or sell bulk fertilizing material, am I required to include a label?

Yes, all OIM products require registration and shall be accompanied by a label compliant with the Fertilizing Materials Law and Regulations as well as the USDA NOP standards.

Where can I obtain copies of the licensing and/or registration applications?
You are encouraged to apply on the online FFLDRS ExtraView Database at https://inspect.cdfa.ca.gov.

Paper applications are available through our website:
https://www.cdfa.ca.gov/is/ffldrs/fertilizer_OIM.html

What is required with the application for licensing and/or registration?

Provide the following information with a fertilizing materials license application: a completed application via the online ExtraView database or a paper application and a license fee of $100.

Provide the following information with a fertilizing materials label registration application: a completed application via the online ExtraView database or a paper application (OIM-0001), an application for a license if not currently licensed, one 8 ½ x 11 copy of each product label, $1,000 registration fee for each product label to be registered, and completed forms OIM forms OIM-0002, OIM-0010, OIM-0013 (include the percentage of each active and inactive ingredient). Additionally, a complete written description of the manufacturing process for each input ingredient as well as for the final finished product. Include also the intended use of the product, any alternate formulation(s), and supporting data (efficacy, MSDS, analytical, etc.) as appropriate.

Who requires a fertilizing materials license?

Any individual or company who manufactures or distributes fertilizing materials in California shall, before they engage in the activity, obtain a Commercial Fertilizing Materials License for each plant and business location they operate.

Do I need both a license and product label registration?

Yes. All firms are required to have a current license. All product label registration applications require a current license or an active license application.

Who needs to register product labels?

The guarantor of any Organic Input Material is required to register product labels.

How long is the license or registration valid?

A fertilizing materials license is valid for a two-year period that commences January 1, of each odd-numbered year and expires on December 31 of the next even-numbered year. The status and expiration date for a firm's license(s) may be viewed on the firm's online ExtraView account.

A product label registration for fertilizing materials is for a four-year period. The status of product registration(s) may be viewed on the firm's online ExtraView account, where the Certificate of Registration for Fertilizing Materials with the expiration date of all product(s) registered under the firm is also available.

How long does the application process take?

The length of the application process varies. Applications submissions ***and*** re-submissions are reviewed in the order in which they are received. Typically, it takes up to 90 days for a reviewer to conduct a review and provide correspondence to a submission or re-submission. If revisions or clarifications are requested, the firm must re-submit to FFLDRS their product label with the requested revisions or clarifications in order to continue the review process. Each subsequent response or re-submission by the firm is subject to up to 90 days response time from the reviewer, based on the date of receipt of the most recent response/re-submission. If scientific evaluation is necessary, the process would require additional time.

Currently, less than one tenth of the labels received are ready for approval without additional revisions/data. Thus, the majority of firms must resubmit their labels with additional revisions/data.

The best way to minimize the length of the application process is to fully address all items requested by CDFA reviewers in a timely fashion.

Can I challenge the Department's scientific findings?

Yes. A rebuttal may be submitted to clarify deficiencies found in the studies, or additional supporting data may be submitted to substantiate company claims.

How are humic acids guarantees evaluated?

Humic acids guarantees are evaluated based on analysis of the humic acid content in a product using the CDFA in-house humic acid method. A copy of the method used by CDFA is available at https://www.cdfa.ca.gov/is/ffldrs/pdfs/HumicAcid.pdf, and many analytical laboratories testing fertilizing materials are familiar with this method. Please reference the 'CDFA Humic Acid method'.

Can silicon be guaranteed in fertilizing materials?

A Soluble Silicon (Si) guarantee may appear on fertilizing material labels under the 'CONTAINS BENEFICIAL SUBSTANCES:' heading. See the example that appears in this guide under beneficial substance products. Acceptable claims for soluble silicon include general claims such as strengthening and promotion of upright stature. Specific claims may require further scientific evaluation. The method for soluble silicon analysis is available at https://www.cdfa.ca.gov/is/cac/CAC_Methods_Publications.html

???? Questions – Please contact FFLDRS staff at fertilizer@cdfa.ca.gov