

DEPARTMENT OF FOOD AND AGRICULTURE

A.G. KAWAMURA, Secretary

1220 N Street
Sacramento, CA 95814-5607
(916) 445-0444



March 30, 2004

NOTICE

To: Fertilizer Industry

Labeling of Phosphorous Acid Products

Pursuant to the December 6, 2003 revision of Title 3, California Code of Regulations Section 2300, phosphorous acid products shall no longer guarantee available phosphoric acid, utilizing AOAC Official Method 960.02.

Fertilizing materials that contain phosphorous acid shall now state on the label the percentage of "Total phosphoric acid" in the guaranteed analysis statement as follows. The AOAC method of analysis is not to be stated in the guarantee.

Total phosphoric acid (P₂O₅) X%

"Available phosphoric acid" is not to be guaranteed in products that contain only phosphorous acid as a source of phosphorus. The following information is still required on the label of phosphorous acid products to avoid crop injuries and assure the most favorable opportunity for plant response:

- 1) Phosphorous acid products are for use as a supplemental fertilizer treatment.
- 2) Upon foliar application, the phosphite ions are taken up directly by the plant foliage and may undergo a degree of conversion to phosphate ions, or will be used directly by plants, as phosphite ions.
- 3) As a soil application to annual crops, a lesser response from the initial crop, with a corresponding superior response from succeeding crops may be observed. In addition, placement close to seeds or root zones may be injurious to crops. The effect may be aggravated by a soil pH below 6.5.

The Agricultural Commodities and Regulatory Services (ACRS) Branch will enforce the above provisions to assure consumers of fertilizing materials that the product purchased is properly identified, and is of the quality and quantity represented by the manufacturer. The California Department of Pesticide Regulation may also regulate some uses of this substance as a pesticide under the Authority of Division 7 of the California Food and Agricultural Code.

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This notice supercedes the Notice to the fertilizer industry dated March 19, 1996. If you have any questions regarding the regulation changes, please contact Maryam Khosravifard of the ACRS Branch at (916) 445-0444. Should you have questions concerning uses of this substance as a pesticide, please contact George Farnsworth with the Department of Pesticide Regulation at (916) 445-4163.

Sincerely,

Scott T. Paulsen, Branch Chief
Agricultural Commodities and Regulatory Services Branch
Inspection Services

SP/kq

bcc: George Farnsworth, Department of Pesticide Regulation
Roy Rutz, Department of Pesticide Regulation
Renee Pinel, California Plant Health Association