

Humic Acid Labeling Aid

If your product label has a guarantee for humic acid, please answer the following questions:

1. What are the sources of humic acid?

The only humic acids sources allowed shall be humic substances harvested from terrestrial deposits. Refer to Term T-100 in the Association of American Plant Food Control Officials (AAPFCO) official publication:

Humic Substances: Sources of humic substances are commercially harvested from terrestrial deposits which include, but are not limited to, leonardite, oxidized lignite, sub-bituminous coals, humalite, carbonaceous shales (including humic shale), peat, and sapropel.

2. What is your product type?

- a) If your product is a **Beneficial Substance - Physical** with additional ingredients, add humic acid and its source to the ingredients list. For example: "Ingredients: Coco coir, peat moss, perlite, humic acids (from leonardite)".
- b) If your product is a **Beneficial Substance - Chemical/Biological**, add the humic acid guarantee under a "CONTAINS BENEFICIAL SUBSTANCE" heading, a percentage value to the right, and the source of humic acid. For example:

CONTAINS BENEFICIAL SUBSTANCE
Humic acid from leonardite ...X%

- c) If your product **guarantees nutrients**, add the humic acid guarantee under an "ALSO CONTAINS BENEFICIAL SUBSTANCES" heading, a percentage value to the right, and the source of humic acid. For example:

ALSO CONTAINS BENEFICIAL SUBSTANCE
Humic acid from leonardite.... X%

3. Label claims

- a) Humic acid may aid in the uptake of micronutrients.
- b) Humic acids are allowed to claim "plant biostimulant", but not the abbreviated and undefined term of "biostimulant".
- c) Additional permitted claim for humic acids as a plant biostimulant: "acts to support a plant's natural nutrition process", and

4. The humic acid guarantee should be based on the CDFA method for determination of humic acid. Here is the link for the CDFA method:

<https://www.cdfa.ca.gov/is/cac/pdfs/HumicAcidAnalysis.pdf>

Note: Fulvic Acid is not a recognized fertilizing material in California. You may submit efficacy data for review to substantiate label claims and ingredient recognition as well as a laboratory analysis to verify the label guarantee.

State of California
DEPARTMENT OF FOOD AND AGRICULTURE
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GRAY DAVIS, Governor

**MANUFACTURERS AND DISTRIBUTORS OF HUMIC ACID PRODUCTS
REGARDING ACCEPTABLE PRODUCT CLAIMS FOR HUMIC ACIDS**

The Department of Food and Agriculture has received numerous inquiries from humic acid manufacturers and distributors regarding label statements and product claims. We would like to take this opportunity to clarify the acceptable labeling statements for humic acid products.

At this time, the Department only allows one product claim for humic acid: "Humic Acid may aid in the uptake of micronutrients". ~~The statement "NOT A PLANTFOOD INGREDIENT" in all capital letters is also required on the product label.~~ The Department has not received any efficacy data that substantiates additional or expanded product claims for humic acids.

We are aware that several companies have made expanded product claims for humic acids in brochures and advertisements. It is a violation of the Fertilizing Materials Law and Regulations to make any product claim that is not approved on the registered label. Companies that make expanded claims will be subject to enforcement action.

If your company is considering an efficacy study for the purpose of expanding your product label claims for humic acid products, we ask that you submit an experimental protocol to the Department prior to conducting the study. While this is not mandatory, it allows our staff to review the experimental design and resolve any concerns before you undertake the study.

If you have any questions regarding fertilizing material product registration, please call and ask to speak to a fertilizing material registration specialist at the above number.

Sincerely,

Steven D. Wong, Branch Chief
Agricultural Commodities and Regulatory Services

Original Date of this notice: January 3, 1988

Updated: February 13, 2003

March 15, 2009

State of California
Arnold Schwarzenegger, Governor
California Department of Food and Agriculture
A.G. Kawamura, Secretary

**NOTICE TO FERTILIZER MANUFACTURERS WITH PRODUCTS CONTAINING HUMIC
ACID**

The California Department of Food and Agriculture (CDFA) Fertilizing Materials Inspection Program is responsible for sampling fertilizing materials in the State of California. Over the past 18 months, the program discovered that over half of the humic acid products were deficient from the manufacturer's guaranteed analysis and in violation of the California Fertilizing Materials Law and Regulations code 14682(b). CDFA allows a 10% variance for humic acids; therefore, solid and liquid humic acid products must meet 90% of the label guarantee. The program has recognized that some companies maybe using testing methods that are not consistent with the CDFA method for humic acid analysis.

In an attempt to standardize the humic acid testing method, CDFA is recommending the following:

Institute an in-house or third party laboratory test that is consistent with the method used by CDFA for any product(s) that guarantee humic acid. A copy of the method used by CDFA is included with this letter. CDFA uses and recommends standards available from the International Humic Substances Society to determine the accuracy of the method.

The program acknowledges that products may require re-labeling, new registration or reformulation to accurately reflect the humic acid guarantee. As a result, CDFA has instituted a six-month grace period on all humic acid products. **All products with a humic acid guarantee must be in compliance by September 1, 2009.** Violations for humic acid after September 1, 2009, may be subject to immediate quarantine of product inventory or cancellation of the fertilizer license.

Please contact Dr. Amadou Ba, Research Manager at the number below if you have any questions.

Sincerely,
Asif Maan, Ph.D.
Branch Chief
Fertilizing Materials Inspection Program
Feed, Fertilizer, Livestock Drugs and Egg Regulatory Services

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