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Oregon Department of Agriculture
Pesticides Division
Fertilizer Program Policy

Issue: Some products that require registration under Oregon Revised Statutes (ORS) 633.311 to 633.479 display guarantees for humic acid content. When claims for ingredients other than primary nutrients, secondary nutrients, or micronutrients, such as humic acid, are made, those claims must satisfy the following requirements:

1. A product ingredient may not be listed, claimed or guaranteed on the label or labeling without prior approval by the Department [ORS 633.321(6)]; and
2. The analytical method used to identify and quantify the ingredient on the label guarantee must be approved by the Department [ORS 633.321(1)(h)].

In the early-2000s, the Department began to identify serious variations in the humic acid analyses of products sampled in the field and the guarantees displayed on the product labels. Without exception, the amounts of humic acid determined by the Department were substantially lower than the product guarantees. When product registrants were contacted regarding the identified humic acid deficiencies, the chief reason cited was the use of different analytical methods to determine humic acid content.

The variability among analytical methods is of particular concern when the substance in question (in this case, humic acid) is operationally defined; that is, its presence is quantified in terms of a specific analytical process. For regulatory purposes, it is important to employ an analytical method or methods that can provide accurate and reproducible results over a wide range of sample types.

The primary reason that the Department's Fertilizer Program exists is to provide a level playing field for product registrants and consumers. With the identification that different humic acid laboratory methods have the ability to produce substantially different results on the exact same sample, the Department has chosen to adopt a single humic acid analytical method.

Policy: The Department has adopted California Department of Food and Agriculture (CDFA) laboratory method HA4/JC (current revision 2 ~ 3/11/09) as its standard method for humic acid determination.

Products sampled by the Department and found with deficient guaranteed humic acid content beyond the investigational allowance of 15% of the listed guarantee as determined by laboratory method HA4/JC may be subject to enforcement action.