

Bat Guano Labeling Aid

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 which includes values for total organic matter ('as is' basis), total nitrogen (N), and available phosphate (P_2O_5).
 - 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 provided an acceptable laboratory analysis, an invoice from your bat guano supplier/manufacturer is required.

Label claims

- The term fossilized bat guano may not be used, as this claim cannot be verified.
- Labels that specify the origin of the bat guano must submit proof to the program.

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

~Also refer to the notice to industry



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 (P₂O₅).
- 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 (P₂O₅) 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

