

California Department of Food & Ag
Attn: Dale M. Woods Ph.D.
Environmental Program Manager I
Feed, Fert. & Livestock Drugs Svcs.,
1220 N. Street
Sacramento, CA 95814-5607

Dr. Woods –

On behalf of XYZ Company, I am writing you to encourage the California Department of Food and Agriculture to adopt the standardized procedure for measuring humic and fulvic acids that was developed by the Humic Products Trade Association (HPTA) and approved by the Association of American Plant Food Control Officials. Adopting the HPTA method should reduce consumer confusion and help create uniformity among states.

As a corporate member of the HPTA, we wholly endorse uniformity by consensus. We also believe that the purpose of the HPTA, which is to advance the commercial uses of humic products through scientific and regulatory cooperation, aligns very closely with that of the AAPFCO, to develop and promote uniform state regulations.

Please make this important issue a priority and help make the appropriate changes to your state to ensure consistent interpretation and testing guidelines among all states to eliminate misleading and duplicitous fertilizer labels for products containing humic substances.

Sincerely,

XYZ Representative
Title