



# Verbal Comments to the NOSB Spring 2010

Tim Stemwedel

California Organic Fertilizers, Inc.

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# Introduction

- Tim Stemwedel,  
Founder/Owner/President of California  
Organic Fertilizers, Inc.

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- California Organic Fertilizers, Inc. has  
been manufacturing organic fertilizers for  
over 20 years.



# Topics

- Waste Streams as Crop Inputs
- Sunset Review of Liquid Fish
- Additional Comments on CSL
- General Comments



# Waste Streams as Crop Inputs

- My research has shown that these materials are:
  - Not made with the intent to be used in organic crop production
- Since this is the case:
  - Organic rules are not taken into consideration when producing these materials
- By-products included in this category are:
  - Corn Steep Liquor – CSL
  - Concentrated Separated By-product – CSB
  - Lysine By-product
  - Other Raffinates



## Waste Streams as Crop Inputs – contd.

- A number of these waste stream materials have been banned and others are currently under review
- I believe it is bad for the organic industry to be dependent on waste



# Sunset Review of Liquid Fish

- Fish with phosphoric or sulfuric acid is a formulated product and doesn't meet the requirements for inclusion on the NOSB list
- Each ingredient must be considered separately by petition
- Alternatives to the use of phosphoric or sulfuric acid are available, such as citric or acetic acid.
- The use of strong acids creates a chemical reaction.



# Additional Comments on CSL

- Statements in addition to the comments I have posted to regulations.gov:
  - CSL is an industrial waste/by-product of manufacturing cornstarch-based cardboard glue and is not an agricultural product
  - There are alternative fertilizers available
  - The addition of SO<sub>2</sub> should make CSL a formulated product, so each ingredient must be considered
  - We have looked extensively at the manufacturing process but not at the shipping and handling



## Additional Comments on CSL – Contd.

- CSL is very biologically active and ferments easily (why  $\text{SO}_2$  is needed)
- CSL must not be stabilized in order to ship or store the material
- Due to fermentation issues, it is not stored for more than a few days at the production site
- My research has shown that CSL is usually stabilized to stop fermentation using Sodium Bisulfite
- I am in support of OMRI's position on CSL



# General Comments

- I am also against using food process rules for organic crop inputs.
- I ask the NOSB to be cautious in making recommendations that reduce the value of the Organic Brand by allowing organics to converge with conventional agriculture.
- I ask that EPA List 3 and 4 ingredients be considered separately by petition.



# Conclusion

- In conclusion, I want to thank you for your attention.
  - Are there any questions?
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