Accredited Certifiers Association
PO Box 85 Mabel, MN 55954
(844) 783-7974
www.accreditedcertifiers.org

ACA Best Practices for Common Material Review Issues
July 2019

Introduction

Introduction

Purpose
ACA Best Practices describe actions certifiers should take to verify operator compliance, as well as producer activities that can easily be approved by certifiers. The ACA strives to ensure that all Best Practices are consistent with the Organic Foods Production Act (OFPA) and the USDA Organic Regulations. These Best Practices are not legally binding, but if an operator presents plans that fall outside of these Best Practices, then then the Organic System Plan (OSP) should provide a rationale for alternative methods and an explanation for how their system fulfills the applicable portion(s) of the related regulations. Certifiers will evaluate whether the differences can be justified. Similarly, if certifiers take an approach that is different from what is presented here, they should be able to articulate how the differing approach is justified according to the OFPA and the USDA Organic Regulations.

Background
7 CFR 205.105 describes allowed and prohibited substances, methods, and ingredients in organic production and handling. §205.600 – 205.607 describes the National List of Allowed and Prohibited Substances. Organic certifiers and material review organizations strive for consistency in evaluating material inputs for compliance with the USDA Organic Regulations. However, material reviewers find that evaluation is a nuanced process, and the language of the regulations does not always present clear direction. Guidance is sought from the National Organic Program (NOP) regarding known material review disputes, and material reviewers work together to arrive at resolutions to common questions.

In 2017, a working group comprised of certifiers and material reviewers assembled to document common approaches to review of a number of materials. This information was presented at the 2018 ACA Annual Training in San Antonio, Texas. Later, the group re-assembled to develop similar training materials for the 2019 ACA Annual Training in Greenville, South Carolina. Some of the 2017 materials were revised at that time, having been noted as such in this updated document.

Group members have determined that it would be best to revisit and add to this document on an annual basis with input from as many certifiers and material reviewers as possible. Those interested in participating in ongoing working group efforts should contact the ACA.

Crop

1. Newspaper or other recycled paper

References: §205.601(b)(2)(ii); §205.601(c)

Sources: In determining allowed sources of “other recycled paper”, we generally support a liberal interpretation of what it means to be “recycled.” An analysis of the full manufacturing

process of the paper is not necessary. Rather, we just need to verify that it meets any definition of "recycled" and also that it does not contain glossy or colored inks.

Allowable sources of "recycled" paper include:

- Any paper (including virgin paper) that has been diverted from a waste stream
- Any paper (including virgin paper) that has been previously used in any manner
- Any paper that includes any amount of recycled content (e.g. paper with 5% recycled content)

Newspaper from any source is allowed and is not required to be verified as "recycled." Virgin newsprint-grade paper is allowed. The only prohibited source of paper that we could identify is 100% virgin non-newspaper paper which was not previously used and/or diverted from a waste stream.

Additives: Additives and processing aids that are used during the manufacturing of paper, as described in the technical reports, are allowed as part of the "standard of identity" of paper as it is listed on 205.601. For additives that are added after the paper has been manufactured (e.g. adhesives added to paper), there are 2 different approaches used by certifiers for evaluation (listed below). NOP guidance is pending to determine the appropriate approach for these "post-paper" additives.

- Approach #1: Additives added after the paper has been manufactured are reviewed individually in accordance with the National List (synthetics must be on 205.601). Under this approach, glue inherent in corrugated cardboard is allowed, but glue added to make paper pots is prohibited.
- Approach #2: Additives added after the paper has been manufactured are allowed if they are the same/similar to additives that would have been allowed in the manufacturing of paper. Under this approach, glue added to make paper pots is allowed.

Uses: Newspaper and other recycled paper are clearly allowed for use as mulch and as compost feedstocks. Certifiers are also allowing the use of these paper products to be planted directly in the ground (e.g. paper pots used to grow transplants), even though the National List does not directly provide for this use* (e.g. paper pots may not have an explicit weed control or compost feedstock function). The allowance of paper to be planted in the ground is based on common sense justification, such as: When paper is used as a mulch, it is in direct contact with soil and may be left in the field to decompose. Paper that is planted in soil is essentially having the same impact on organic integrity.

* During the Spring 2018 Meeting of the National Organic Standards Board (NOSB), the National Organic Program clarified that, while use of paper is allowed as mulch or compost feedstock, use of paper for the purpose of transplanting does not comply with the regulations. Certifiers noted this was a departure from common practice of certifiers, and NOP allowed an initial phase-out period to end after the 2018 growing season. They suggested that interested

stakeholders should submit a petition for paper pots to be added to the National List for the use described. Since then, a petition has been submitted to the NOSB for consideration. At the request of many stakeholders, NOP has extended the phase-out period until further notice. These Best Practices may be amended depending upon the outcome of the petition process.

New paper pots should be reviewed for acceptable sources of paper and additives as stated above in approach #2. Any crop producer can use approved paper pots, including growers that were not previously using paper pots. The review and approval of paper pots is subject to change depending on the completion of the NOSB review.

2. Substrate used inside containers for container/hydroponic production (including transplants)

References: §205.601(j)

In this issue, we are using the term "substrate" to refer to soil or soil-substitute materials that hold plant roots and the matrix within which the roots grow. Examples of substrate are pictured below. The substrate is distinct from the container or tray (e.g. "devices") that physically contains/holds the substrate materials.

potting mix (soil, compost, vermiculite) **[Nonsynthetic]**

coconut coir, peat moss **[Nonsynthetic]**

Blended plant fiber mat **[Nonsynthetic]**

rockwool plugs **[Synthetic]**

foam cubes **[Synthetic]**

plastic polymer mat **[Synthetic]**

Substrate ingredients must be disclosed and reviewed individually in accordance with the National List (synthetics must be on 205.601). Under this approach, synthetic foam cubes and plastic mesh pads are prohibited if the roots permeate the material and cannot be removed.

3. Molasses in crop production

References: NOP 5033; NOP 5034-1

Additives: To confirm nonsynthetic status, certifier should evaluate whether any synthetic additives are added and intended to remain in the final molasses product (synthetic additives include those listed in 5034-1 and any other prohibited additive or ingredient that remains in the final product). An analysis of the full manufacturing process of the molasses material is not necessary. This "sound and sensible" approach is supported by an understanding that processing aids used in the manufacture of molasses are expected to be removed from the final product during standard manufacturing procedures and considered to have no functional effect in the finished product. Synthetic preservatives, artificial colors, and artificial flavors are considered functional and prohibited additives

Certified organic molasses should be allowed as a crop input without further review. This is another sound and sensible approach.

Documentation: Information to confirm nonsynthetic status of molasses may be obtained from the final handler or distributor of the molasses product, provided that the party is knowledgeable. This documentation may include a label with a complete ingredient list, a spec sheet, or a statement from the molasses supplier about whether the molasses contains additives that are intended to remain in the final product. If not, then the certifier would need to trace back in the chain until such verification can be obtained.

4. Nonsynthetic minerals in crop production

References: NOP 5033; NOP 5034; NOP 5034-1

Minerals which are permitted only in nonsynthetic form vary in their risk of being processed or formulated in a manner that may be synthetic. An analysis of the full manufacturing process of the mineral is not necessary in every case.

High risk minerals: The minerals listed below should be evaluated for certain high risk aspects of their manufacturing process to ensure nonsynthetic status. Information to confirm compliance should ideally come from the original manufacturer of the mineral product, and not as a self-declaration from a distributor or re-packager the product. This approach is based on an understanding that distributors/re-packager commonly are unaware of un-labeled additives (such as dust suppressants) or processing methods used in manufacturing and formulating the product.

- Gypsum/Calcium Sulfate: Risk of dust suppressant,recycled wallboard, or smoke stacks (FGD Gypsum).
- Lime/Calcium Carbonate: Must not be beet lime, precipitated lime, or quick lime (calcined from calcium carbonate), or water treatment lime.
- Potash/MOP/SOP/KCl: Must be from mined source. Must not contain prohibited dust suppressants.
- Calcium chloride: Must be from natural brine sources. We interpret the calcium chloride restriction at 205.602(c) to pertain to diseases on fruits such as bitter pit in apples and blossom end rot in tomatoes, peppers, and cucurbits. To our knowledge, there are no agronomic crops that suffer from calcium uptake disorders.
- Salt: Must not contain prohibited anti-caking agents or other additives
- Kaolin: Must not be calcined

Low risk minerals: The minerals listed below do not require additional documentation or further review to confirm nonsynthetic status. This "sound and sensible" approach is based on an understanding that these minerals are rarely, if ever, formulated or processed in a manner that would render them synthetic.

- Vermiculite
- Perlite
- Diatomaceous Earth (calcined forms are considered non-synthetic)
- Leonardite
- Oyster Shell
- Sand
- Greensand
- Basalt Grit

5. Conventional manure

References: §205.203, §205.601, §205.602, NOP 5034-1

Raw Manure: Raw conventional manure is allowed as long as it is verified that prohibited additives (e.g. pit additives, fly sprays, odor control) are not added after the manure is removed from the animal area. The attached Off-Farm Manure/Bedding Verification can be used to verify compliance with this best practice. Please note that this form also has a section on bedding, which does not relate to this best practice but was included for convenience.

6. Compost and vermicompost

References: §205.203, §205.601, §205.602, NOP 5006, NOP 5021, NOP 5034, NOP 5034-1

Compost

Feedstock:

- Non-synthetic non-agricultural ingredients
    - Must not be prohibited at 205.602
    - Individual verification may vary, depending on the ingredient, i.e.
        - Lime is verified to be mined with no synthetic additive and processing is reviewed
        - Citric acid is verified to be non-synthetic and non-GMO
        - Vermiculite is considered an allowed non-synthetic without review
    - Manure/animal products
        - Verified according to best practice section 5.
- Non-synthetic agricultural ingredients
    - Allowed unless prohibited at 205.602
    - Not required to be organic
    - Not verified to be free of pesticide residues
    - Processed ag ingredients and food waste are not included under this topic
- Synthetic ingredients added directly to the compost
    - Must be listed as allowed at 205.601(c) or 205.601(j)

Compost manufacturing process verification:

- Containing no manure or animal products:
    - Compost that contains only plant materials and no animal materials is permitted for use without restriction, even if it does not meet the composting requirements at §205.203(c)(2), NOP 5006 and NOP 5021.
- Containing manure or animal products:
    - To be allowed without restriction:
        - 1. Meets the NOP standard at 203(c)(2)
            - Initial C:N ratio of between 25:1 and 40:1; and
            - Maintained a temperature of between 131 °F and 170 °F for 3 days using an in-vessel or static aerated pile system; or

- Maintained a temperature of between 131 °F and 170 °F for 15 days using a windrow composting system, during which period, the materials must be turned a minimum of five times.

- 2. Meets the Processed Animal Manures Guidelines in NOP 5006 (Processed manure products must be treated so that all portions of the product, without causing combustion, reach a minimum temperature of either 150o F (66o C) for at least one hour or 165o F (74o C), and are dried to a maximum moisture level of 12%; or an equivalent heating and drying process could be used. In determining the acceptability of an equivalent process, processed manure products should not contain more than 1x103 (1,000) MPN (Most Probable Number) fecal coliform per gram of processed manure sampled and not contain more than 3 MPN Salmonella per 4 gram sample of processed manure.)
- 3. Meets the Compost and Vermicompost in Organic Crop Production NOP Guidance 5021 The compost pile is mixed or managed to ensure that all of the feedstock heats to the minimum of 131° F (55° C) for a minimum of three days. The monitoring of the above parameters must be documented in the OSP in accordance with § 205.203(c) and verified during the site visit. Certifiers reviewing compost inputs produced by commercial operators should similarly review the production methods and source materials. (NOP 5021). Initial C:N ratio is not required.

Vermicompost

Not containing manure:

- Vermicompost that contains only plant material and no animal materials (e.g. raw manure) may be used without restriction, and does not need to meet additional vermicompost production requirements.

Containing manure:

- Vermicompost containing manure or animal products that does not have the days-to-harvest restriction may be used without restriction, and does not need to meet additional vermicompost production requirements.
- Vermicompost containing animal materials that meets the vermicompost production requirements may be used without restriction.
    - Vermicomposting is an acceptable method of composting when:
        - 1. It is made from allowed feedstock materials (either non-synthetic substances not prohibited at § 205.602, or synthetics approved for use as plant or soil amendments);

- 2. Aerobic conditions are maintained by regular additions of layers of organic matter, turning, or employing forced air pipes such that moisture is maintained at 70-90%; and
- 3. The duration of vermicomposting is sufficient to produce a finished product that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances. Verification may include:
    - Type and duration of vermicomposting (duration of vermicomposting is at least 12 months for outdoor windrow, 4 months for indoor container systems, 4 months for angled wedge systems, or 60 days for continuous flow reactors).
        - For outdoor windrows, one indicator that the process is complete is when the worms move out of the compost, which would typically take 6 months in warm conditions, or up to 12 months in colder climates.
    - Testing for pathogens (Salmonella and fecal coliform organisms) and/or heavy metals.
    - Earthworms fragment the organic wastes into finely-divided materials with a low C:N ratio and high microbial activity.
    - Nitrogen is mostly found in the nitrate form, and potassium and phosphorus are in soluble forms.
    - For most organic wastes, no traces of the raw materials are visible. Processing is maintained at 70-90% moisture content with temperatures maintained in the range of 18-30 degrees C (65-86 degrees F) for good productivity.

- Vermicompost that contains animal materials that does not meet vermicompost production requirements must comply with the the days-to-harvest restrictions.

7. Biodynamic prep - Horn manure:

References: §205.203, §205.601, §205.602, NOP 5034-1

Horn manure spray is produced by filling a horn with raw animal manure, burying the horn in soil for a specified period of time, unburying the horn, and diluting the contents with water for application to crops or fields.

- Synthetic ingredients must be listed at §205.601(j) and non-synthetic ingredients must not be prohibited at §205.602. Restrictions and annotations, such as documentation for micronutrient deficiencies, must be followed.

- Preparations containing animal manure, including horn manure spray, must comply with raw manure days-to-harvest restrictions.
- In general, this process does not satisfy the requirements for composted manure or processed manure that would exempt the use from the pre-harvest interval requirements that apply to raw manure under section 205.203(c)(1) of the USDA organic regulations or NOP Guidance 5006. Certifying agents may need to review the manufacturing process on a case-by-case basis to determine whether the raw manure restriction applies; however, for purposes of the guidance, we have not amended the listing. The only manufacturing process that would not require the raw manure days-to-harvest restriction would be using composted or processed manure. The pre-harvest interval begins the date the horn is buried.

8. Plastic mulch and covers

References: §205.2, §205.206(c)(6), §205.601(b)(2)(ii), NOP Policy Memo 15-1, NOP 5034-1

Mulch. Any nonsynthetic material, such as wood chips, leaves, or straw, or any synthetic material included on the National List for such use, such as newspaper or plastic that serves to suppress weed growth, moderate soil temperature, or conserve soil moisture.

Non-biodegradable:

- Plastic and other synthetic mulches and covers (petroleum-based other than polyvinyl chloride (PVC)) are allowed for weed control, provided that they are removed from the field at the end of the growing or harvest season. Current commercial product used (at least in USA) do not contain PVC, so PVC free is not verified for synthetic mulches and covers. Recycled products (billboard covers) should be reviewed for PVC content.
- Plastic mulch should be verified to be non-biodegradable.
- Plastic covers alone are not considered an acceptable buffer or barrier from prohibited substances.
- For perennial crops harvested over more than one season, synthetic plastic mulch may be used provided it is removed before it breaks down or degrades. The operator must provide a description of the estimated life span of the material and plans for removal at the appropriate time in the Organic System Plan.

Biodegradable Biobased Mulch Film

Biodegradable biobased mulch film. A synthetic mulch film that meets the following criteria:

> *(1) Meets the compostability specifications of one of the following standards: ASTM D6400, ASTM D6868, EN 13432, EN 14995, or ISO 17088 (all incorporated by reference; see §205.3);*

(2) Demonstrates at least 90% biodegradation absolute or relative to microcrystalline cellulose in less than two years, in soil, according to one of the following test methods: ISO 17556 or ASTM D5988 (both incorporated by reference; see §205.3); and

(3) Must be biobased with content determined using ASTM D6866 (incorporated by reference; see §205.3).

- Biodegradable biobased mulch films as defined in §205.2 are allowed for weed control, provided that they are produced without organisms or feedstock derived from excluded methods.
- It is unlikely that any brand name products currently in the marketplace will comply with the NOP regulations. Most and possibly all, of the currently marketed biobased mulch films contain some petrochemical feedstocks, and the feedstocks are typically less than 50% biobased.

Livestock

1. Bedding treatments in livestock production

References: §205.603, §205.239(a)(3)

Ingredients: Ingredients in bedding treatments must be reviewed individually in accordance with the National List (synthetics must be on 205.603).

- Synthetic vitamins and minerals that are listed at 205.603(d) are prohibited.
- Agricultural ingredients must be certified organic. (Note: OMRI does not currently require agricultural ingredients to be organic but will revisit this policy in the future.)

Other considerations

- Alternative label claims or intended uses could result in different review criteria (e.g. treatments for the purpose of controlling pests may contain synthetic EPA List 4 inerts; treatments intended for health care purposes may have synthetic excipients permitted via 205.603(f), non-organic agricultural ingredients, and/or other synthetic ingredients on 205.60(a)).
- Use of treated bedding in other areas of production (e.g. removing spent bedding from barn and spreading on organic fields) may involve additional considerations by certifiers.

2. Excipients in livestock health care products

References: §205.603(f)

Resources for identifying allowed excipients: The following website and databases may be used to identify specific materials that are allowed under 205.603(f):

Quick List:

- *Meta-database, including GRAS Notices, Indirect Additives used in Food Contact Substances, and Substances Added to Food (formerly EAFUS)*
    - https://www.accessdata.fda.gov/scripts/fdcc/index.cfm?cat=foodingredpkg&type=basic&search
- *GRAS*
    - GRAS Listings in 21 CFR: http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&sid=786bafc6f6343634fbf79fcdca7061e1&rgn=div5&view=text&node=21:3.0.1.1.13&idno=21
- *Approved by FDA as Food Additive:*
    - Food Additives (Direct and Indirect) Listings in 21 CFR: https://www.ecfr.gov/cgi-bin/ECFR?SID=4ef603918faa9b29d7bf77dbdf995159&mc=true&page=simple
    - Substances Added to Food (Formerly EAFUS): https://www.accessdata.fda.gov/scripts/fcn/fcnNavigation.cfm?rpt=eafusListing
    - Color Additives Status List: https://www.fda.gov/ForIndustry/ColorAdditives/ColorAdditiveInventories/ucm106626.htm
    - Indirect Additives used in Food Contact Substances: https://www.accessdata.fda.gov/scripts/fdcc/?set=IndirectAdditives
- *Included in FDA review and approval of NADA or NDA:*
    - To verify FDA approval of NADA (New Animal Drug Applications)*:* https://animaldrugsatfda.fda.gov/adafda/views/#/search
    - To verify FDA approval of NDA (New Drug applications), use the Inactive Ingredients in FDA Approved Drugs database: https://www.accessdata.fda.gov/scripts/cder/iig/index.cfm .
    - To verify APHIS approval, use the Current Veterinary Biologics Product Catalog: http://www.aphis.usda.gov/animal_health/vet_biologics/publications/CurrentProdCodeBook.pdf
    - Inactive Ingredients in FDA Approved Drugs: https://www.accessdata.fda.gov/scripts/cder/iig/index.cfm

Materials that are allowed under 205.603(f) must meet one or more of the following criteria:

1. *Identified by the FDA as GRAS:*
    - GRAS Listings in 21 CFR
2. *Approved by the FDA as a food additive:*

    The FDA definition of a food additive includes food contact substances, indirect food additives, and color additives. The definition excludes GRAS substances, but GRAS substances are explicitly allowed in the rule.

    There is an FDA "Search Food Ingredient and Packaging Inventories" tool that simultaneously returns results from GRAS Notices, Substances Added to Food (formerly EAFUS), and Indirect Additives Used in Food Contact Substances, **along with other datasets that are not relevant to the NOP standards**. It is important to verify sure that search results come from a database that is covered under the standards. The "Search Food Ingredient and Packing Inventories" database covers all datasets that would satisfy the first two criteria in 205.603(f)

    Occasionally, CAS #'s or alternate names of substances do not match the listings in the searchable datasets. If this is the case, it may be worth asking the manufacturer if they know of a 21 CFR citation for the material that would meet the criteria for an FDA approved food additive. The 21 CFR description can referenced if the description substantially matches the material in question, and the material is listed in a section that meets the definition of a food additive:
3. *Included in FDA review and approval of NADA or NDA:* Excipients in APHIS-approved biologics or NADA/NDA-approved products are allowed without further review.
    a. NADA (New Animal Drug Applications)
    b. NDA (New Drug applications), verified using the Inactive Ingredients in FDA Approved Drugs database
    c. APHIS approval, verified using the Current Veterinary Biologics Product Catalog:

Note from 2015 technical evaluation report on excipients: "Although synthetic excipients did not appear at §205.603 until 2007, they have been used in livestock drugs and health care products with various interpretations by certification agencies and Material Review Organizations (MROs) as to their allowance (NOSB 2009). Since their listing on §205.603, there has still been some confusion among certification agencies about direct vs. indirect food additives, how those may be used, and their compliance with the excipient annotation (since the annotation does not stipulate 'direct' food additives and only says "approved by the FDA as a food additive") (emphasis added). Some certification agencies permit the use of indirect food additives only in health care products that are intended for external application (e.g., teat dips) while others do not permit them at all. Others permit indirect food additives in all types of health care products, including oral and injectable formulas."

Excipients in Iodine products: Ingredients that are identified as "complexing agents" in an iodine formulation are allowed as part of the "standard of identity" of iodine. Most complexing agents are identified in the Technical Report on Iodine. Ingredients that are not identified as the complexing agents for the iodine must be reviewed individually and be permitted under one of the resources listed above.

NPEs: If not being reviewed as iodine complexing agent, NPEs and APEs must be reviewed individually and be permitted under one of the resources listed above. The Technical Report on NPEs lists a few compounds that are permitted as livestock excipients.

3. GMO vitamins in livestock feed

References: §205.237, §205.603(d); NOP 5030

The GMO status of AAFCO-listed vitamins used in certified organic livestock feed does not need to be verified. This position is supported by NOP 5030, which called out only a few specific items as needing to be additionally verified, but not vitamins. The draft version of this guidance was originally published with the following statement: "Minerals and vitamins cannot be sourced from slaughter byproducts from poultry or mammalian sources (if being fed to poultry or mammals) or sourced from products produced by excluded methods." This language was removed and not included in NOP 5030. Some vitamins are exclusively from GMO sources, and NOP 5030-1 Response to Comments recognizes that there is a lack of NOP/NOSB guidance regarding sources of livestock minerals and vitamins; it also suggests that vitamins "should" be reviewed for excluded methods and noted NOP may provide more information in the future, but it does not say that vitamins "must" be reviewed for excluded methods. (Note: OMRI and WSDA public lists will not include GMO vitamins.)

AAFCO and FDA listed vitamins and minerals, as listed at 205.603(d), are allowed for use in livestock feed and feed additives without additional verification of GMO status, with the exception of proteinated minerals, which require some additional verification, and minerals sourced from bone such as bone charcoal, bone meal, and bone phosphate, which are prohibited.

Multiple Scopes/Other

1. Affidavits for verifying GMO status

References: §205.105(e)

In cases when GMO status of a material must be verified for compliance, affidavits are an acceptable form of documentation. However, certifiers vary in the exact language of the affidavit and the party whom is required to sign the affidavit. Even with this variation, some

'best practices' have been identified (although some exceptions may apply for some type of materials for some uses by some certifiers).

Language on affidavits should encompass the entire manufacturing process of the material including the source organism, such that products produced from fermentation by a GMO microorganism are evaluated and prohibited, even if the final product does not contain genetically modified material.

Affidavits that only verify whether the product contains GMO are not sufficient (such as some affidavits from the EU and/or from the Non-GMO Project).

Affidavits should ideally be signed by the original manufacturer of the material, rather than the final handler, distributor, or re-packager

Conclusion:
The ACA recommends all accredited certifiers adopt ACA Best Practices for the sake of consistent implementation of the USDA Organic Regulations. ACA Best Practices are reviewed periodically to ensure they are accurate and up to date. Concerns with this or any ACA Best Practice or guidance document should be submitted to the ACA Executive Director.

OFF-FARM MANURE VERIFICATION

Use this form to provide information on bulk off-farm manure and/or bedding materials. Have the supplier of your manure and/or bedding complete this form. *(Note: This form does not apply to packaged and labeled products.)*

I have provided _____ with _____
(client name) (manure and/or bedding)

SECTION 1: Off-Farm Manure Verification

MANURE Type of animals: _____

Check manure type

- ❑ liquid manure
- ❑ solid
- ❑ semi-solid
- ❑ dehydrated
- ❑ pelleted
- ❑ other: _____

Does the manure contain ingredients added to the manure pit or pile (pit additives, fly sprays, odor control digesters, etc.)? No further review of livestock bedding materials is needed.

- ❑ No
- ❑ Yes _____ (list inputs added)

Manager Name (print)_____
Company/Farm Name _____
Address _____ City _____ State___ Zip _____
Phone _____ Email _____
Signature of Manager _____ Date _____

SECTION 2: Off-Farm Bedding Verification (Complete this section only if wood-based bedding is being used.)

BEDDING Type _____ Source _____

(sawdust, wood shavings, etc.) (farm or company name)

Does the wood based bedding come from untreated sources?

- ❑ No
- ❑ Yes

If no, list wood source/ingredients:_____

Manager Name (print)_____

Company/Farm Name _____

Address _____ **City** _____ **State**___ **Zip** _____

Phone _____ **Email** _____

Signature of Manager _____ **Date**

_____