



## Sun+Earth Standards – Proposed Changes

### Modify Core Requirement 8.5

	Current Standard	Proposed Standard	Reason for Proposed Change
8.5	<p>Soil fertility and plant health inputs must be produced on the farm through biological processes to promote measurable increases in soil organic matter over time.</p> <p>The use of non-manure soil fertility inputs manufactured off-farm should be minimized and must contribute to less than half of the total materials applied.</p>	<p>Soil fertility and plant health inputs must be produced on the farm through biological processes to promote measurable increases in soil organic matter over time.</p> <p>The use of non-manure soil fertility inputs manufactured off-farm should be minimized with the goal that they contribute less than half of the total materials applied.</p>	<p>The current standard requires that a farm’s non-manure imported nutrients represent less than half of the total materials applied. It is very difficult for an inspector to measure the total amount of materials applied and compare that to imported non-manure inputs because recordkeeping on the farm most often doesn’t account for all “materials” applied like farm grown inputs like leaves, plant matter waste, cover crop waste, etc.</p> <p>The current standard is not being enforced the way it is written because it is not feasible to measure.</p>

### Annex 1 (Crop) Proposed Changes:

1. Add:

- a. Bat Guano - Allowed as a minor ingredient in potting soils.
- b. Citric Acid - produced from microbial fermentation with non-GMO microbes.
- c. Humic Acid - Produced from naturally occurring deposits of humic acids and humates, can be extracted with water and/or with alkaline materials.

- d. Micronutrients - Derived from natural sources (like rock dust), or can be synthetic micronutrients if there is a documented deficiency demonstrated through soil or tissue testing, or observed symptoms of micronutrient deficiency within the plant. Synthetic micronutrients are allowed only after other techniques to alleviate the deficiency have been attempted. Only OMRI, WSDA Organic, or CDFA OIM approved synthetic micronutrients are allowed.

## **Annex 2 (Manufacturing) Proposed Changes:**

### 1. Add:

- a. Alcohol - For use as a sanitizer; certified organic alcohol is required if used as a solvent for extraction purposes or for winterization of oils.
- b. Ascorbic acid.
- c. Chlorine materials - disinfecting and sanitizing food contact surfaces, equipment and facilities may be used up to maximum labeled rates.
- d. Nutrient vitamins and minerals, in accordance with 21 CFR 104.20, Nutritional Quality Guidelines For Foods.
- e. Pectin (non-amidated forms only).
- f. Phosphoric acid - For cleaning of food-contact surfaces and equipment only.