



Attachment 2 - A

P.R. FERTILIZER REGULATION ARTICLE IV (B) 7

1. Pesticide Residue Analysis

The regulation establishes:

“Document of analysis of pesticide residuals for those fertilizers that should not contain pesticides but that are processed in plants that manufacture fertilizers with pesticides”. The Agriculture Department of the state or country or origin must certify annually that the manufacturing plant doesn’t manufacturer mixed fertilizers (fertilizers with pesticide)

2. Certification of Analysis of bacteria, virus, fungus, or pest on animals plants, or persons stating that they have not been detected in the fertilizer.

The purpose of this requirement is to avoid contamination occurring from soil adhered to bags and containers that could be carriers of these bacteria, virus, mold or pest on animals, plants or persons.

Microbiologists of California University and from Georgia University to the effect that fertilizers could be carriers of such bacteria have conducted studies.

The attached documentation to this respect is self-explanatory. Please see the correspondence of:

- a. Dr. David L. Lewis - Research Microbiologist
University of Georgia
- b. Lynn Griffith - President A & L Southern Agricultural
Laboratories
- c. Mark Wheelis Phd. Microbiologist DBS University of California



3. Certificate that the filling or inert ingredient is free from pests and pathogens, and information in regards to the components of the material.

It has been proven that fillers such as sand or soil can contain crop seed or weed seed. The Department in turn regulates crop seed and weed seed. Certification that the sand, soil or vegetative matters used as filler were fully sterilized prior to be incorporated into fertilizer.

4. Certification of analysis stating that the same does not contain heavy metals detrimental to the environment (according to the parameters to be established by the Secretary).

Since 1998 studies have been conducted in the states and among the international community in regards to metals in fertilizers and their effect on the crops and their “farm to the table” effect. Documents from Washington, California, Canada and Australia were reviewed. Also we attended the AAPFCO meetings, and finally, their recommendations of metals were adopted. An Administrative Order was approved and enacted.