



Plant Health and Biosecurity Directorate
Fertilizer Safety Section
59 Camelot Dr.
Ottawa, Ontario
K1A 0Y9

Telephone: (613) 773-7374
Email: derek.curley@inspection.gc.ca

June 7, 2016

David Abecassis
Green Growers Technology Alliance, LLC
64 Folsom Avenue
Huntington Station NY 11746 USA
david@ggtaorganics.com

Re:	Product name	File Number*
	"Geo"™ Growth Enhanced Organics	46440NR

*Please refer to this file number in all future correspondence.

Mr. Abecassis,

After reviewing the submitted information, this product currently meets the specialty fertilizer exemption set out in Section 3.1 (3)(g) of the *Fertilizers Regulations*. A specialty fertilizer is defined as (a) recommended for use only on household plants, urban gardens, lawns or golf courses or in nurseries or greenhouses.

These products are exempt from registration, but are still regulated and must meet all of the standards and requirements set forth in the *Fertilizers Act* and *Regulations* in order to be sold in or imported into Canada.

Therefore, the new registration submission has been closed.

Labelling requirements can be found in section 16 of the *Fertilizers Regulations*.

These products do not require a pre-market assessment prior to legally being imported and/or sold in Canada.

The mandate of the Fertilizer Program changed substantially when the Fertilizers Regulations were amended in April 2013. In accordance with the amended Regulations, the CFIA no longer regulates product efficacy and quality, and focusses its efforts on the safety of the product. Since requirements to substantiate product performance and benefit claims were removed, the Fertilizer Safety Section (FSS) has been receiving more inquiries and requests for registration of complex formulations with multiple active ingredients. The result is that safety reviews are more scientifically demanding and take more time to complete. As this is occurring at the time when we have fewer staff, meeting service delivery standards has become challenging.

We recognize that timely product registrations are critical to the success of your business and provide Canadian farmers and consumers with access to innovative fertilizers and supplements. We continue to process applications as quickly as possible and in the order they are received. We have also developed strategies that, once implemented, can help bring the file review times back within SDS. Some of these actions are internal to the CFIA, while others place greater onus on the applicant and introduce changes to submission review procedures.

In accordance with this plan the CFIA will:



- Continue to work to staff vacant positions that are the most critical to timely file review
- Work with the Pre-market Assessment Submission Office (PASO) to improve administrative aspects of file processing (including a new informatics system to facilitate file tracking and reporting)
- Focus on mandated activities only by:

a) temporarily suspending the review of products that are regulated but do not require registration (Letters of No Objection). The FSS intends to resume these reviews once the SDS are met consistently.

We are currently not conducting label reviews at this time.

Please be advised that the importation of fertilizer and supplement products may be subject to requirements under the *Plant Protection Act* (if the product contains soil or materials of plant origin), and the *Health of Animals Act* (if the product contains materials of animal origin) **regardless** of the registration requirement under the *Fertilizers Act*.

To determine the appropriate importation requirements, the Automated Import Reference System (AIRS) should be consulted prior to importation. (See link below)

<http://www.inspection.gc.ca/plants/imports/airs/eng/1300127512994/1300127627409>

Plant Health

Import Permit

59 Camelot Drive

Ottawa, Ontario, K1A 0Y9

Telephone: 613-773-7361 / Facsimile: 613-773-7229

Email: PermitOffice@inspection.gc.ca

Web: <http://www.inspection.gc.ca/plants/imports/eng/1299168480001/1299168593866>

Animal Health

Import/Export Animal Products and By-Products Section

APABPImport@inspection.gc.ca

Should you ever wish to determine the regulatory requirements of your products prior to import and/or sale in Canada to ensure compliance as per the *Fertilizers Act* and *Regulations*

Product specific inquiry

The *Fertilizers Act* and *Regulations* delineates and explains which products require registration, and which products do not require registration. Products that do not require registration may still be regulated under the *Fertilizers Act* and *Regulations*. Please note that the classification of products and the registration requirements are based largely on the product label, and the intended use pattern.

Product proponents, especially those who are unfamiliar with the *Fertilizers Act* and *Regulations*, or who are uncertain of the regulatory requirements specific to their product, are encouraged to start the process with the submission of an inquiry.

To determine if a product requires registration, and what the specific regulatory requirements may be, the information found in the submission checklist for a Product Specific Inquiry must be submitted to the Fertilizer Safety Section.

When this information is received by the Fertilizer Safety Section, an Inquiry file will be opened, and you will receive a response from an evaluator within 30 working days. The response provided will explain the categorization of the product under the *Fertilizers Act* and *Regulations*, as well as the requirements specific to that product type.



An inquiry may provide the answers that a proponent requires and eliminate the need for a meeting. However, if a product proponent or the Fertilizer Safety Section feels that a more detailed face-to-face consultation is warranted, a pre-consultation meeting may be requested. This is especially relevant for innovative products where the regulatory and policy requirements may be in transition or in the initial stages of development.

Submission Requirements

The information requirement below pertain only to product specific inquiries. General inquiries require a cover letter at minimum.

Cover Letter:

Explaining the intent of the inquiry
Purpose of import / End use (if applicable)
A copy of the proposed marketplace label

Constituent Materials:

Identification and description of all materials used in the production of the end product (include all
formulants; dust control anticaking agents etc.)
The source of the materials used
Proportion of the materials
Description of the manufacturing / blending process

Please be advised that this submission is now closed and your fees will be refunded.

Please do not hesitate to contact me should you have any other questions about this response or should any other Fertilizer/supplement related questions.

For more information including product submission checklists, various trade memorandums regarding signing authority and safety requirements for various product submissions, as well as information on our service delivery standards, please visit our website at: <http://www.inspection.gc.ca/english/plaveg/fereng/ferenge.shtml>

Sincerely,

Derek Curley
Senior Evaluator
Fertilizer Safety Section