

**NORTHWEST HORTICULTURAL COUNCIL**  
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October 25, 2016

Ms. Michelle Arsenault  
Advisory Committee Specialist  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Ave. SW  
Room 2648-S Mail Stop 0268  
Washington, DC 20250-0268

Dear Ms. Arsenault,

**RE: Docket Number: AMS-NOP-16-0049**  
**Notice of Meeting of the National Organic Standards Board**

The Northwest Horticultural Council (NHC) appreciates the opportunity to comment on 1) the upcoming Sunset Review of organic materials, 2) a proposed new use for an allowed substance, and 3) a discussion document, all listed in the most recent National Organic Standards Board (NOSB) Materials Report that impact tree-fruit growers and packers.

The NHC represents growers, packers, and shippers of apples, pears, and cherries both conventional and organic, in the states of Idaho, Oregon, and Washington on regulatory issues of federal and international policy.

The Pacific Northwest is the national leader in the production of organic apples, pears, and cherries. Over seven million boxes of organic apples are now harvested from more than 14,000 acres in Washington state, amounting to over 70 percent of the entire organic apple crop in the United States. There is also a significant amount of organic pears and cherries, with more than 4,100 acres planted across the Pacific Northwest. Organic tree-fruit production in the Pacific Northwest is increasing, with additional acreage being transitioned to organic each year.

In many ways, this region is the epicenter for organic pome fruit and cherry production in the United States. The total organic fruit crop for the region topped \$463 million in 2015, of which organic apples alone accounted for approximately \$398 million. In fact, tree-fruit accounted for 60% of farm gate sales for all Washington state organics that year.

We have compiled a list of items from those listed by the NOSB for review that are of particular importance to organic tree-fruit growers and packers. Below you will find this list complete with NOSB citation and a brief description of the item's standard usage and why the product is needed.

- **Peracetic Acid (citation 205.601 (a))** – Peracetic acid (PAA) is used as a sanitizer or disinfectant (oxidizer) for equipment and for water sanitation. While very commonly used in tree-fruit packinghouses, PAA is also used in the orchard setting for sanitation of equipment such as picking bags, pruning shears, and bins to control human health pathogens including E. Coli or Listeria. PAA is also used to control the bacterial plant pathogen *Erwinia amylovora* (fire blight), an economically significant pest of pear and apple trees.

With new requirements for sanitizing equipment and tools that touch the fruit, which will soon be imposed on all tree-fruit growers through implementation of the Food Safety Modernization Act Produce Safety rule, continued access to PAA is critical. Chlorine is currently the only other widely used sanitizer permissible under the National Organic Program, and reliance on a single sanitizer can lead to resistance development by pathogens.

- **EPA List 3 - Inerts of Unknown Toxicity (citation 205.601 (m))** – It is our understanding that this list includes material used in passive polymeric dispensers. These dispensers are used by organic tree-fruit growers for mating disruption for pests including codling moth and leaf roller. They are widely used by organic tree-fruit growers, and are essential to their ability to control these pests that can often pose a significant threat to organic tree-fruit production. Loss of these materials could be catastrophic to the organic tree-fruit industry.
- **Calcium Chloride (citation 205.602 (c))** – Calcium chloride is a common plant nutrient that provides calcium for plants, including pome and stone fruit trees, and helps prevent destructive post-harvest physiological disorders such as cork spot and bitter pit. It is widely used among Pacific Northwest organic tree-fruit growers.
- **Marine Algae Materials (citation 205.601 (j))** – Marine Algae plant extracts are used to enhance soil fertility in the orchard by providing valuable micronutrients that are essential for fruit quality. Use of this natural substance in the orchard improves fruit health and quality, improving the fruit's storability and reducing the probability of post-harvest physiological disorders in handling.
- **Proposal: Sodium Chlorite for the generation of chlorine dioxide gas-petitioned (citation 205.601 (a))** – Under its current allowable use as a liquid, Sodium Chlorite is used for generation of chlorine dioxide. Chlorine dioxide is widely used in tree-fruit packinghouses for water sanitation in dump tanks or may be applied to the fruit as a wash through spray bars. It is a critical tool to reduce cross contamination of naturally-occurring human health pathogens such as E.coli and *Listeria monocytogenes* that may enter a packing facility, both for consumer safety and

regulatory compliance once the Food Safety Modernization Act's Prevention Controls for Human Food rule and Produce Safety rule go into effect.

The NHC supports the petition to add the use of Sodium Chlorite for the generation of chlorine dioxide gas to the list of allowable substances. Chlorine dioxide gas can be used as a sanitizer to kill pathogens on food contact surfaces, as well as entire packing and storage facilities.

- **Discussion document: Cumulative impact of phosphates in organic processed foods** – Phosphates are a plant nutrient that provides phosphorous for plants. While our grower and packer members do not make processed foods and therefore do not use this product in the context of the discussion document, phosphate may be applied to the soil when planting new orchards to stimulate root growth. Foliar applications may be used after flowering and at early ripening. Phosphorus is involved in energy transfer, the maintenance of cell membranes, and has a direct effect on yield and tree health. It also impacts fruit size, firmness, color, and storage potential. The NHC asks that the NOSB recognize its important use in orchards when considering changes to policy in relation to phosphates in general.

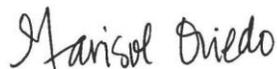
## Conclusion

The loss of PAA, passive pheromone dispensers, calcium chloride, marine algae, or phosphates would highly impact our organic tree-fruit growers and packers. Removal of these substances could consequently force our local organic tree-fruit growers and packers out of organic production. In addition, the use of sodium chlorite for the generation of chlorine dioxide would provide a valuable tool to organic packers as they work to reduce the potential for naturally-occurring pathogens harmful to human health from reaching consumers. We ask that members of the board consider their decision carefully while recognizing the importance of these materials, both for the important role each plays in organic tree-fruit production but also to preserve management options necessary to respond to operational needs in organic production and packing.

Thank you for your careful consideration of these comments.

Sincerely,

NORTHWEST HORTICULTURAL COUNCIL



Marisol Oviedo  
Regulatory Information Specialist

CC: NHC Science Advisory Committee's Organic Subcommittee  
NHC SAC Chairman Don Gibson