NORTHWEST HORTICULTURAL COUNCIL
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September 28, 2023

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

RE: Docket Number AMS-NOP-23-0026-0002; Notice of Meeting of the National Organic Standards Board

Dear Ms. Arsenault,

The Northwest Horticultural Council (NHC) appreciates the opportunity to comment on the National Organic Standards Board (NOSB) proposals and discussion documents pertaining to organic materials listed in the most recent NOSB meeting materials posted in the *Federal Register* on June 7, 2023. Many of the NOSB proposals, petitions, and discussion documents referenced in this letter are especially pertinent to the growers, packers, and shippers of organic apples, pears, and sweet cherries in Idaho, Oregon, and Washington that the NHC represents.

The Pacific Northwest region is the epicenter for organic pome fruit and cherry production in the United States, leading the nation in the production of organic apples, pears, and cherries. Over 15.5 million boxes of organic apples are now harvested from nearly 29,000 acres in Washington state, amounting to over 90 percent of the value of sales of the fresh organic apple crop grown in the United States. There is also a significant volume of organic pears and cherries grown in our region, with more than 7,200 acres planted across the Pacific Northwest.

Organic tree fruit production in the region is increasing, with additional acreage transitioning to organic each year. The total value of the organic tree fruit crop for the region topped $693 million in 2020, of which organic apples alone accounted for approximately $606 million. In fact, tree fruit accounted for 50 percent of farm gate sales for all Washington state organics that year.

Organic tree fruit production, handling, and shipping is very complex. Our farmers must routinely manage pests that have the potential to make fruit unfit for consumption, or that suppress tree growth and overall production. In the Pacific Northwest, growers must protect fruit from injury by 33 direct insect pests (those that feed directly on the fruit), 47 indirect insect pests

(those that feed on the tree), two common bacterial pathogens, eight fungal pathogens, ten viral pathogens, five phytoplasmas and viroids, and seven postharvest diseases (Washington State University, 2023). Invasive or emerging pests are also a continual threat.

In addition to pests and diseases that affect the fruit or the tree, our growers and packers must also combat foodborne pathogens, such as *Listeria monocytogenes*, pathogenic *E. coli*, and *Salmonella*, that are naturally occurring in the environment. Growers and packers must have access to the sanitizers necessary to prevent cross-contamination on food contact surfaces through the harvest and packing process. Access to different types of sanitizers with different modes of action is critical to sanitizing the various types of food contact surfaces and attacking the multitude of microorganisms that can be found in the growing and packing environments.

The Organic Foods Production Act (OFPA) states that synthetic substances may be permitted if, among other things, the substance is deemed "necessary to the production or handling of the agricultural product because of the unavailability of wholly natural substitute products." We ask NOSB members to be cognizant of the impacts to the practical abilities of organic growers and packers to produce organic food in a matter that allows for effective management of threats from plant pests and diseases and human pathogens when considering whether a listed material truly has a wholly natural alternative. In particular, the evolution of insect, weed, and microbe resistance means that producers and packers need access to multiple tools to deploy season-long pest management programs that allow for the rotation of products with differing modes of action to manage the evolution of pest resistance and therefore to be able to continue growing and handling organic food. One product often cannot and should not be considered as a full substitute for another.

Not all alternatives provide equal efficacy in controlling the target pest organism; nor is it a given that an alternative product is compatible with all pest management or food safety programs in all regions of the country in vying to manage varying pest and pathogen complexes under a myriad of different weather and soil conditions. Impacts to material supply chains are another important consideration when deliberating whether to delist existing materials. Manufacturers and input distributors may not have the capacity to easily ramp up production and distribution of alternative products to fill a void created by delisting, leaving end users without the materials they need to produce and pack organic produce.

The NHC appreciates the NOSB's good work in its preparation of the Proposals, Discussion Documents, and Sunset Reviews for the NOSB meetings. We have compiled a list of materials 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, a brief description of the item's standard usage, and whether and how the product continues to be needed by organic tree fruit growers.

Crops Subcommittee (CS)

2025 Crops Sunset Reviews

§205.601 Sunsets: Synthetic substances allowed for use in organic crop production

Alcohols
§205.601(a)(1)(i) Ethanol and (1)(ii) Isopropanol; As algicide, disinfectants, and sanitizer, including irrigation system cleaning.
Ethanol and isopropanol alcohols should continue to be listed as algicides, disinfectants, and sanitizers, including for irrigation system cleaning. These two alcohol products are critical tools used by tree fruit growers to decontaminate the lines of irrigation systems and to disinfect a variety of on-farm implements.

Algae and bacteria grow in surface water used for irrigation. These organisms can form biofilms and other suspended solids that then travel inside the irrigation lines, clogging the emitters and micro sprinklers. Biofilms can be nesting places for pathogenic microorganisms, which diminish the effect of central irrigation water disinfection (Van Ruijven, *et. al*, 2021). If not prevented, emitter clogging can cause damage to irrigation systems, as well as unequal application of nutrient solution to the crop, negatively impacting plant growth.

Alcohols are used to clean pruning shears while removing infected shoots or branches, as shears can become contaminated with fire blight, a disease caused by the bacteria *Erwinia amylovora*. Apple and pear trees are among the many plant species susceptible to fire blight, which kills flowers and young shoots. The bacterial pathogen, which is present in internal tissues or on the bark surface, infects the shears as the blades pass through the branch or shoot. When the next cut is made with contaminated blades, the bacteria may be transmitted and a new infection established (Teviotdale, *et. al*, 1991).

Alcohols play a critical role in disinfecting orchard tools and work surfaces, being used by nearly all organic tree fruit growers. When label use directions are followed, neither material poses a risk to human health nor presents an environmental concern. Neither ethanol nor isopropanol are applied to edible organic fruits.

Plastic Mulch and Covers
§205.601(b)(2)(ii) Plastic mulch and covers; **As herbicides, weed barriers, as applicable.**
Plastic mulches and covers offer numerous crop production benefits in addition to being a weed suppresser and barrier, including protecting plants from pests, reducing fruit rot, and conserving water by decreasing evaporation. These products are used extensively in both organic and nonorganic production systems, and have received strong support for continued listing from organic growers during sunset review consideration. Plastic covers are essential for the organic tree fruit industry of the Pacific Northwest for use as bird and insect netting, wind screens, shade cloths, and weed mats.

Drape nets are deployed to keep Brown Marmorated Stink Bug (*Halyomorpha halys*), or BMSB, and other insect pests out of the orchard. There are no chemicals allowed in organic production that control adult BMSB, and therefore no alternative to drape netting. In addition to excluding

birds and insects, netting and shade cloth can be used for hail protection and sunburn protection. Tree fruit growers who have invested in the infrastructure to set up these nets in their orchards continuously use these products.

Reflective ground covers are important materials that tree fruit growers use every season, helping to advance the bloom early in the season and with color development in certain varieties of apples and sweet cherries later in the crop cycle. Light is reflected up into the tree canopy to help the fruit gain additional color and maturity. If used and maintained properly, reflective ground materials can be used more than once during the growing season or during multiple seasons, and are therefore less impactful to the environment than plastic products that must be replaced annually. Following postharvest control, they are removed for the winter and stored until spring.

Ground covers have also proven useful in cherry orchard blocks as a deterrent for various leafhoppers known to transmit the Western-X phytoplasma, the causative pathogen of Little Cherry Disease (LCD), which is epidemic in the Pacific Northwest and has caused significant damage to cherry orchards. LCD has no treatment and infected trees produce shrunken, leathery-skinned, pale fruit. Management efforts focus on reducing transmission through removal of infected trees, resulting in significant loss of cherry acreage in recent years. Using ground covers deters leafhoppers from feeding on trees at the block level in both high-pressure and low-pressure blocks (Northfield & Nottingham, 2021). Specifically, research by Northfield and Nottingham (2021) found ground covers reduced leafhopper numbers by 80 to 90 percent compared to the control, and reduced vector access to important X-disease hosts in the orchard such as dandelions and mallows.

Elemental Sulfur
§205.601(e)(5) Elemental sulfur; As insecticides (including acaricides or mite control).
§205.601(i)(10) Elemental sulfur; As plant disease control.
§205.601(j)(2) Elemental sulfur; As plant or soil amendments.
Elemental sulfur is an essential tool for the organic tree fruit industry in all three of its currently allowed uses – as an insecticide and miticide, as plant disease control, and as plant or soil amendments. Sulfur treatments do not cause phytotoxicity, nor do they lead to undesirable soil or fruit residues at harvest (Jamar, *et. al*, 2010). It is important to have several materials to rotate between to avoid resistance evolution, and the alternatives to elemental sulfur do not provide the same level of control and are not compatible with other materials used during the growing season. Sulfur is also one of the six macronutrients plants need to survive, along with nitrogen, phosphorus, potassium, calcium, and magnesium. We strongly support the continued listings of elemental sulfur.

For its insecticide/miticide listing, elemental sulfur is used to control orchard pests that damage leaf tissue (Rocha, 2012). The rust mite feeds on plant foliage, which can cause bronzing of leaves and premature suspension of shoot growth when in high numbers. Applications of elemental sulfur to control rust mites in organic pear and apple orchards take place early in the growing stage, normally pre-bloom. There are currently no alternatives for controlling this pest. The spider mite feeds on leaves, which removes the cell contents and results in bronzing of foliage and premature defoliation. Fruit on trees heavily infested with spider mites fails to obtain proper color and size, and fruit production for the following year may be lowered (Wunderlich,

et. al, 2017). The white apple leafhopper feeds by sucking on leaf tissue, leading to a white stippling on leaves and possible weakening of buds and reduction in fruit size.

As a plant disease control, elemental sulfur helps control powdery mildew, scab, and brown rot in apples, pears, and sweet cherries. Fungal infections in fruit trees spread quickly and easily, resulting in crop loss due to reduced fruit set (the process of a flower forming a fruit), stunted fruit growth, or severe fruit surface blemishing. Elemental sulfur is one of the few options organic growers have for treating powdery mildew. Fire blight caused by *Erwinia amylovora* is the most serious bacterial disease in organic apple trees and is difficult to control. It causes blossom clusters to wilt and collapse in late spring, which leads to a brown, sticky secretion from diseased tissue (Wunderlich, *et. al*, 2017).

For plant or soil amendments, elemental sulfur is used to adjust soil pH. Ninety-nine percent pure elemental sulfur is the material used in orchard sulfur burners to generate the on-site form of sulfurous acid (also up for sunset review, see comments below), which is needed to treat irrigation water. A balanced pH through the use of elemental sulfur ensures better plant nutrient uptake (particularly phosphorus, iron, and zinc), better water penetration, and enhanced overall plant health, which in turn provides a healthy soil environment for beneficial insects and microbial activity (Hemmaty, *et. al*, 2012).

Lime Sulfur
§205.601(e)(6) Lime sulfur; **As insecticides (including acaricides or mite control).**
§205.601(i)(6) Lime sulfur; **As plant disease control.**
Lime sulfur has been a staple of disease management in both organic and conventional tree fruit production in the Pacific Northwest for more than a century. It is a well-known source of calcium and sulfur, controls diseases such as blight, mildew, and scab, helps control various orchard pests, and is not harmful to humans or the environment (Chagas, *et. al*, 2001). The vast majority of organic tree fruit growers use lime sulfur.

Lime sulfur is used during the dormant season prior to the trees leafing out. This use helps control arthropod pests, such as phloem feeding aphids, scales, and mites, that have overwintered in apple and peach trees. These pests can cause serious damage to fruit trees, resulting in reduced tree vigor, cracked branches, irregular shoot growth, and thin or bronzed foliage. Left unchecked, aphids may enter the fruit through the calyx end and can cover fruit and foliage with honeydew, which causes a black, sooty mold to develop, ultimately hindering leaf function and lowering fruit grade (Wunderlich, *et. al*, 2017).

Tree fruit growers rely on beneficial arthropods, including pollinators, to assist in maintaining a healthy orchard that produces high-quality fruit. Integrated Pest Management (IPM) programs allow growers to apply necessary materials at the most efficacious time and location, limiting any substantial harm to beneficial mites and insects in the orchard. IPM targets applications of lime sulfur to areas or instances of high pest damage and to specific times when beneficials are not present or at low populations in the orchard. Additionally, research by Washington State University shows the beneficial predatory mites *Typhlodromus pyri* and *Typhlodromus occidentalis* have become resistant to a range of agricultural pesticides, including organophosphate insecticides, which has led to their successful use in tree fruit IPM programs

(Riedl & Croft, 1993). Further studies – particularly under realistic field conditions – are needed to better understand the effects of lime sulfur and its indirect effects on natural enemies.

Tree fruit orchard managers understand that honeybees may be present in orchards during applications of lime sulfur and take extensive precautions to avoid spraying the bees or their hives. Label restrictions have been added to ensure proper application, which minimizes the potential for spray drift and for negative impacts on crops and beneficials/pollinators. When followed correctly, growers have not observed a decline in their beehives or bee numbers. Also, many growers plant pollinator-friendly flowers and shrubs along orchard borders to help provide additional pollinator habitat.

Lime sulfur applications also help to control overwintering pathogens such as mildew, scab, and several forms of blight (Johnson & Temple, 2013). Fire blight caused by *Erwinia amylovora* is the most serious bacterial disease in organic apple trees and is difficult to control. It causes blossom clusters to wilt and collapse in late spring, which leads to a brown, sticky secretion from diseased tissue. Following the loss of antibiotics as an approved substance on the National List, growers required alternative materials to control fire blight in organic apple and pear orchards. Research by Johnson and Temple (2013) was critical in determining the efficacy of lime sulfur as a fire blight control, and also to confirm its capabilities for uses against arthropod pests and various diseases. “Lime sulfur offers more flexibility than anything else out there,” said Dr. Kenneth Johnson (K. Johnson, personal communication, August 28, 2023).

Lime sulfur is also applied at bloom time, which is crucial to limit the growth of bacteria within the blossoms of the fruit tree, therefore decreasing the potential for infection (Kunz 2006). Bloom is also an important time of the season for the control of powdery mildew on apples and of bacterial canker and gummosis on cherries. Depending on the level of infection or infestation, some growers may use lime sulfur as a clean-up spray post-harvest as the plants enter dormancy. With few alternatives as effective as lime sulfur for these uses, and clear regulation of its application via label restrictions, we strongly support the continued listing of lime sulfur.

Hydrated Lime
§205.601(i)(4) Hydrated lime; As plant disease control.
Hydrated lime is an organic fungicide used as a foliar application by tree fruit growers. There are few viable alternatives available to organic tree fruit growers to control various types of mildew and that do not cause phytotoxicity on leaves or fruits. Therefore, a majority of organic tree fruit growers use this material. Hydrated lime is typically used in combination with copper sulfate, as it acts as a precipitating agent, making the copper available to prevent infestations of mildews and other pathogenic fungi in fruit production systems (Grimm-Wetzel & Schönherr, 2006). The NHC agrees with the subcommittee in the continued listing of hydrated lime as a plant disease control.

Liquid Fish Products
§205.601(j)(8) Liquid fish products; As plant or soil amendments.
Liquid fish products play a vital role in aiding organic farmers’ tree nutrition programs and should continue to be included on the National List. These products are used by nearly all organic tree fruit growers in the Pacific Northwest. Liquid fish products are important fertilizers

for providing nitrogen and phosphorus, and contain many trace minerals critical for tree health. Liquid fish foliar applications have also been shown to help improve crop yields and reduce insect and disease pressures (Madende & Hayes, 2020).

In addition to benefiting organic crop production, there are environmental benefits as well. Liquid fish products are otherwise considered an industrial waste product, so processing them into plant and soil amendments can recycle about 30 to 70 percent of fish waste that would otherwise be wasted (Ahuja, *et. al.,* 2020).

Sulfurous Acid

§205.601(j)(11) Sulfurous acid; As plant or soil amendments, for on-farm generation of substance utilizing 99% purity elemental sulfur per paragraph (j)(2) of this section.

A majority of organic tree fruit growers use sulfurous acid to reduce high pH in irrigation water, which is not conducive to plant or soil health. The process involves running irrigation water through sulfur burners, which acidifies the water to adjust the soil pH. Ninety-nine percent pure elemental sulfur is the material used in the orchard sulfur burners to generate the on-site form of sulfurous acid.

Irrigation water with a high pH, if left untreated, causes calcium carbonate build-up on the leaf and fruit surface. A balanced pH ensures better nutrient uptake (particularly iron, zinc, and phosphorus), better water penetration, and enhanced overall plant health, which in turn provides a healthy soil environment for beneficial insects and microbial activity (Hemmaty, *et. al,* 2012). Apple research by Hemmaty (2012) found that on average, applying sulfur decreased pH of soil by 17.1 percent, increased the chlorophyll content of leaves by 4.8 percent, and increased the concentration of iron, zinc, and phosphorus by 30.2 percent, 11.6 percent, and 18.8 percent, respectively, as compared to the control.

The benefits of sulfurous acid over alternative soil and plant amendments are clear. By reducing calcium carbonate on the fruit surface, the overall condition and appearance of the fruit is improved and the potential for russeting of the fruit surface is reduced. By balancing the pH of the soil, the soil health is improved, creating an environment for beneficial insects and fungi to survive and thrive. By improving the soil health, its ability to absorb water is enhanced, thereby reducing both the water needed to sustain the crop and the potential for water runoff.

§205.602 Sunsets: Nonsynthetic substances prohibited for use in organic crop production

Potassium Chloride

§205.602(e) Potassium chloride – unless derived from a mined source and applied in a manner that minimizes chloride accumulation in the soil.

The NHC agrees with the subcommittee in the continued listing of potassium chloride as a prohibited material.

Handling Subcommittee (HS)

2025 Handling Sunset Reviews

§205.605 Sunsets: Nonagricultural (Nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s)).":

Phosphoric Acid
§205.605(b)(23) Phosphoric acid; for cleaning of food-contact surfaces and equipment only.
Phosphoric acid is a tool for the cleaning and sanitizing of equipment used in fruit packing facilities. Cleaning food contact surfaces and equipment removes calcium and other mineral deposit build-up and reduces the potential for cross-contamination. Organic tree fruit packers use phosphoric acid only on an as-needed basis.

Protecting public health is the top priority of organic tree fruit growers and packers. Food handlers must have access to multiple sanitizing and disinfecting products to combat the full plethora of pathogens of human health concern. Different products with different modes of action are regularly used in postharvest handling in order to manage these many pathogens. Phosphoric acid has specific benefits that make it the most effective and appropriate choice for particular circumstances.

Materials Subcommittee (MS)

Proposal: 2023 Research Priorities - Fall 2023
The NHC generally supports the NOSB's 2023 research priorities. The NOSB's annual list of organic food and agriculture research priorities is a good example of how the organic industry has shown itself to be forward-thinking on difficult issues.

Many of the research priorities under *Crops* would benefit organic tree fruit production. These include: collaboration with the IR-4 project to conduct research into organic inputs and cultural methods; studying the economic, social, and environmental impacts of different farming systems; soil health and biodiversity research; identifying practices that reduce greenhouse gas emissions; development of plant disease management strategies to address existing and emerging plant disease threats; and strategies for the prevention, management, and control of problem insects and weeds.

For the research priorities under *Food Handling and Processing*, the importance of sanitizers in tree fruit production cannot be overstated. Using different sanitizers with different modes of action makes them effective against viral, protozoan, and bacterial targets in specific circumstances, enabling producers to reduce threats to human health. Growers and packers need access to more than one type of sanitizer to make the most appropriate choice for a particular circumstance and be able to achieve the critical objective of delivering a safe and healthy product to consumers year-round.

Both of the *General* research priorities are important areas of research for the continued and increased success of organic farming and sales. There are many barriers to consumers accessing organically produced foods and we support studying methods for alleviating those barriers. We also support research into effective methods for providing increased assistance to growers to successfully transition to organic production.

Inert Ingredients

As the NOSB considers options to revise the outdated references to inert ingredients on the National List, any new regulatory approach must minimize unintended harm to organic production and the NOSB process, in part by meeting these criteria: address both EPA List 3 and List 4, avoid increasing the workload of the NOSB, maintain consistent availability of organic pest management materials for organic growers, and provide certainty of regulatory authorization of materials for pesticide manufacturers so that they can continue to produce the products organic growers rely on.

As consideration of this issue continues, the NOP and NOSB must be cognizant of the impacts to practical abilities of organic growers and packers to produce and handle organic food in a matter that allows for effective management of diverse pest threats. In particular, the evolution of insect, weed, and microbe resistance means that producers and handlers need access to multiple pesticide formulations to deploy season-long pest management programs that allow for the rotation of products with differing modes of action to manage the evolution of pest resistance, and therefore be able to continue growing and handling organic food while meeting all federal regulations. Not all alternatives provide equal efficacy in controlling the target pest organisms or pathogen complexes, nor is it a given that an alternative product is compatible with all pest management or food safety programs across the varied growing regions of the country under a myriad of weather and soil conditions.

<u>Questions:</u>

1. **Capacity:** *NOSB members devote a considerable amount of time and energy in the sunset review of the materials that make up the National List. Adding significant numbers of individual listings for inert ingredients would increase this workload. To what extent should NOSB consider current and potential future workload when evaluating the options for modernizing the approval of inert ingredients in pesticide products?*

   Response: The NOSB should give great consideration to its current and future workload, as well as the administrative capacity of the NOP, when evaluating the options for modernizing the approval of inert ingredients. NOSB members, who serve on a voluntary basis, already work dozens of hours each week to review materials and attend subcommittee meetings. NOP staff's ability to meet regulatory requirements and assist NOSB members could be seriously impacted by a substantial increase in the inert ingredients review process.

   Together, EPA List 3 and List 4 include more than 2,700 inert ingredients. Listing them individually would double the number of materials subject to the NOSB's five-year sunset review cycle. The time and effort for the NOSB to perform a sunset review for each item on

the National List is substantial and a petition to add or remove a substance can be a two-to-five-year process.

The NOSB risks compromising its ability to thoroughly conduct the sunset reviews by creating a lengthy, complicated process for maintaining inert ingredients on the National List. Significantly increasing the number of materials on the five-year cycle would be beyond the administrative capacity of both the NOSB and NOP staff.

2. **Authority:** *Congress granted the Environmental Protection Agency the authority to determine efficacy and safety of pesticide products, and Congress granted the NOP and NOSB the authority to determine which pesticide products align with the Organic Foods Production Act and National List Criteria (7 U.S.C. 6517 – 6518). When should NOSB rely on EPA's evaluations of safety, necessity, and efficacy in evaluating inert ingredients used in pesticide products? And when should NOP and NOSB assert its additional statutory constraints and regulatory criteria in the evaluation of inert ingredients in pesticide products?*

   Response: Under the Organic Foods Production Act (OFPA), the NOSB is required to review EPA information concerning the potential for adverse human and environmental effects of substances included, or proposed for inclusion, on the National List. It is the role of the EPA, not the NOP or NOSB, to determine the level of toxicological concern of active and inert ingredients.

   The NOSB and NOP should always rely on EPA's evaluations of safety, necessity, and efficacy in evaluating inert ingredients used in pesticide products. This includes, but is not limited to, incorporation of EPA's Safer Chemical Ingredient List (SCIL), routine dialogue with EPA's Safer Choice Program, and direct communications with EPA staff. The NOSB and NOP have an important role in aligning EPA evaluations with OFPA and National List regulatory criteria, however the regulation of inert ingredients in organic production must first and foremost be based on the EPA's rigorous, scientific analysis of inerts.

3. **Flexibility:** *A stable list of approved inert ingredients can provide assurance to manufacturers and producers that the tools they need to control pests and disease will be there when preventive measures have failed. These manufacturers will continue to innovate and develop tools, and scientific advancements may require additions to or removals from the list of approved inert ingredients. How rigid or flexible should the approved list of inert ingredients be to balance competing concerns? What mechanisms provide stakeholders the ability to simultaneously raise concerns, advance innovation, and maintain confidentiality in amending the approved list of inert ingredients used in pesticide products?*

   Response: The NOSB and NOP must avoid creating uncertainty for pesticide manufacturers via its regulation of inert ingredients approved for pesticide products in organic production. Growers and manufacturers should be provided with a consistent, predictable, science-based approach to how inert ingredients are listed. A process that is inconsistent or frequently modifies approved inerts would put the availability to growers of products critical to organic food production at risk.

An unstable or highly flexible list of approved inert ingredients would create an unpredictable regulatory landscape for organic product manufacturers. For minor crops like tree fruit, manufacturers may opt to not undertake the significant investments and other necessary costs to participate in this process for critical crop protection tools. Additionally, manufacturers and distributers may not have the capacity to readily step-up production and distribution of alternative products to fill a void created by the delisting of an individual inert or group of inerts, leaving end users without the materials they need to produce and pack organic produce.

In addition to public comment opportunities to NOSB and NOP, another mechanism stakeholders have to raise concerns is the periodic review of active and inert ingredients by the EPA. Growers, grower groups, grower advocacy organizations, and other stakeholders can and do submit comments when these materials go through the EPA's rigorous scientific review process.

Conclusion

The NHC's comments are focused on products and proposals important – and in some cases critical – to organic tree fruit production. The loss of these products would negatively impact the abilities of organic tree fruit growers and packers to protect against and manage injury from insect, disease, and microbial pests, and could have the unintended impact of forcing our local tree fruit growers and packers out of organic production.

We ask that members of the NOSB consider their decisions carefully while recognizing the importance of these materials for the role each plays in organic tree fruit production and in preserving management options necessary to respond to food safety concerns and operational needs in organic production and packing. Thank you for your thorough consideration of these comments.

Sincerely,

NORTHWEST HORTICULTURAL COUNCIL

Dan Langager
Technical Communications Manager

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