



February 15, 2024

Dear WSDA Certified Organic Tree Fruit Producer,

Please review this updated notice regarding the continued use of the following inputs in organic production.

- CIDETRAK CMDA COMBO MESO-A (2374)
- CIDETRAK CMDA COMBO (2375)
- CIDETRAK DA MEC (2432)
- CIDETRAK CMDA COMBO PP (2435)
- CIDETRAK CMDA COMBO MESO-W (2583)
- PHEROCON CMDA COMBO-P (2932)
- CIDETRAK CMDA + LR Dual MESO (2999)
- CIDETRAK CMDA + NOW MESO (3032)
- CIDETRAK CMDA + OFM MESO (3126)
- PHEROCON CMDA COMBO-P + AA (3312)

Washington State Department of Agriculture (WSDA) Organic Program evaluates input materials for compliance with federal organic regulations through a voluntary registration service. Companies may apply for registration of their inputs with WSDA Organic Program and if approved, a registration certificate is issued and the use of the WSDA registered organic input material logo is authorized.

WSDA's authority and process for evaluating input materials for compliance with organic standards is outlined in Chapter 15.86 RCW and 16-160 WAC. Included in these requirements is the need for all registered inputs to undergo a full re-review every five years. In rare cases, WSDA may need to reverse review decisions because of new information at the time of the re-review.

In 2023, WSDA Organic Program re-evaluated the ten products listed above, all of which contain 2,4-decadionic acid, ethyl ester, (E,Z). This ingredient is a synthetic pear ester which acts as a mating disruptor for Codling Moth and other insects. WSDA originally evaluated this ingredient and determined it was approved for use in organic production based on 7 CFR 205.601(f), which allows the use of synthetic pheromones for insect management in organic crop production.

Pheromones are volatile chemicals produced by a given species to communicate with other individuals of the same species to affect their behavior. Since the pear ester in the above products is not produced by Codling Moth or other insects, WSDA Organic Program determined as part of the scheduled re-review that pear ester is more appropriately classified as a kairomone, and not as a pheromone.

WSDA Organic Program sought clarification from the USDA National Organic Program (NOP) to determine if the listing on 7 CFR 205.601(f) was specific to chemicals produced by the target species, or if a more generic allowance for semiochemical insect attractants was appropriate. The NOP confirmed synthetic pear ester is not allowed under 7 CFR 205.601(f).

As a result, WSDA Organic Program is unable to re-register the above ten products containing the pear ester, or any other new products containing non-pheromone semiochemical insect attractants, through our organic input registration service.

A petition to add 2,4-decadienoic acid, ethyl ester (E,Z) to the list of synthetic substances approved for use in organic crop production (7 CFR 205.601) was submitted to the USDA National Organic Program in September 2023.

Considering these products were previously registered by WSDA Organic Program and organic producers have made significant good faith investments in these products because of the registration decision, WSDA Organic Program is continuing to allow use of the ten products noted above by WSDA certified organic crop producers while the petition is being evaluated. This use-up will allow time for producers and the industry to consider options while our team closely monitors the petition process. Use of these products will not impact organic eligibility of land or crops certified by WSDA Organic Program.

WSDA Organic Program initially provided notice on this allowance in a letter dated April 10, 2023. The Organic Program will provide additional notice to the Washington organic tree fruit industry if this use-up allowance changes in the future. If you have any questions about this update or organic standards, please contact our team of specialists at 360-902-1805 or <a href="mailto:organic@agr.wa.gov">organic@agr.wa.gov</a>.

Sincerely,

Brenda Book

WSDA Organic Program Manager

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