October 7, 2025

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

RE: Docket Number AMS-NOP-24-0034: Notice of Public 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) sunset reviews, proposals, and discussion documents listed in the NOSB meeting materials posted in the U.S. *Federal Register* on August 19, 2025. Many of the NOSB subcommittee documents referenced in this letter are vital to the growers, packers, and shippers of organic apples, pears, and sweet cherries in Idaho, Oregon, and Washington who the NHC represents.

The Pacific Northwest is the leading region in the United States in the production of organic apples, pears, and sweet cherries. About 17 million boxes of organic apples are now harvested from more than 28,000 acres in Washington state. There is also a significant volume of organic pears and cherries grown in our region, with more than 6,500 acres planted across the Pacific Northwest.

Washington state hosts 89 percent of the reported organic apple acres in the U.S., producing 97 percent of the nation's reported fresh organic apple volume. Washington also has 71 percent of the organic pear acreage and grows 60 percent of the volume in the country, and 83 percent of the sweet cherry acreage and 93 percent of the volume.

The total value of the organic apple, pear, and cherry crops in the Pacific Northwest topped $640 million in 2021, of which organic apples alone accounted for approximately $604 million (USDA NASS, 2022). In fact, organic tree fruit generated more than 50 percent of the farmgate value of all organic products grown in Washington state that year.

Organic tree fruit production, handling, and shipping are complex and costly processes, and have a limited set of tools to manage harmful pests and diseases. 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

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(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 processes, and to comply with food safety regulatory and customer-based requirements. Access to different types of sanitizers with different modes of action is critical to sanitizing the various types of food contact surfaces and combating 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 manner 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 management programs that allow for the rotation of products with differing modes of action to manage the evolution of resistance and therefore to be able to continue growing and handling organic food. A single 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 certain that an alternative product is compatible with all pest management or food safety programs in all regions of the country 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 organic 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 a material, leaving end users without the materials they need to produce and pack organic produce.

The NHC welcomes the five new members to the NOSB and thanks all of the members for their service to the organic industry. We appreciate the many hours of work it takes to prepare each semester's proposals, discussion documents, and sunset reviews. 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, with NOSB citation and a description of the material's standard usage, as well as our feedback on several of the Board's discussion documents, petitions, and proposals.

Crops Subcommittee (CS)

Proposal: Pear Ester – petitioned

Throughout this years-long petition process, the NHC has strongly supported adding the semiochemical pear ester (Ethyl-2E,4Z-Decadienoate, also known as DA) to the National List as a synthetic kairomone. Although pear ester-based mating disruption products have been allowed for use while the petition works its way through the NOSB process, Pacific Northwest organic tree fruit growers were looking forward to having the process resolved this year. The Board decided at its spring 2025 meeting to delay the vote until the fall 2025 meeting in order to draft an annotation that would exclude the use of microencapsulated pear ester spray products due to Board members' concerns over microplastics. However, the NHC strongly encourages the Board to delay the vote again, because the Subcommittee has made a critical error in the language of the draft annotation that must be corrected in order for the use of these mating disruption tools to be maintained.

The Annotation

The NHC is opposed to the annotation as written because it leaves out the most important part of pear ester-based mating disruption – passive pheromone dispensers and lures. While we do not believe this was the Board's intent, the annotation as written would effectively prohibit the use of passive products containing pear ester for mating disruption. That would likely cause many organic apple and pear growers in the Pacific Northwest to leave organic production due to the high pressures of codling moth in the region.

The draft annotation as written limits pear ester use to "traps/monitors." While pest traps are placed in orchards in conjunction with the dispensers, traps are only used to monitor codling moth populations. Using traps to monitor codling moths is important, but it's the mating disruption products that accompany the traps that are the critical pieces of pest control programs in organic tree fruit production.

In addition, we respectfully caution the Board on the overuse of annotations for materials newly added to the National List. This instance is a clear example of when an overly complicated annotation inadvertently prohibits the very products the listing is meant to allow. Annotations should be brief, to the point, and free of ambiguity. The Board must refer the petition back to the Crops Subcommittee to amend the annotation. We suggest the annotation only refer to the microencapsulated products, and should be written as such: "Motion to add pear ester to the National List at §205.601(f) with the following annotation: ~~use of pear ester is limited to passive traps/monitors and~~ not for use in microencapsulated formulations."

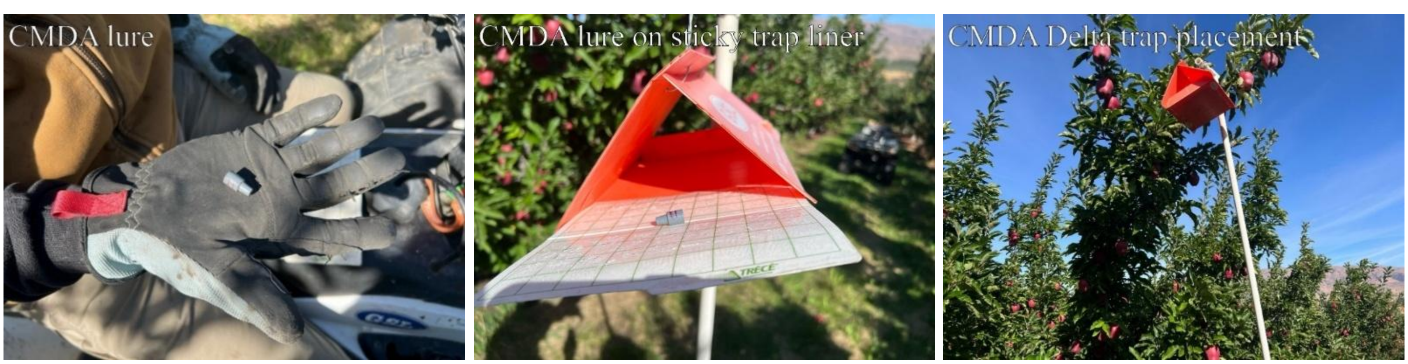
Use of Pear Ester Products

With it's draft annotation, the Subcommittee has conflated the different formulations in which pear ester is used. The annotation refers to "passive traps/monitors," but the traps do not contain pear ester. Lures that are placed inside the traps, as well as the passive pheromone dispensers, contain the pear ester kairomone and release it as a gas (resulting in no residues). Passive lures and dispensers do not contain any microencapsulation. Microencapsulated formulations are used in spray mechanisms, not in the passive products.

The entire reason for using synthetic pear ester is to disrupt the mating of codling moth, which is accomplished by hanging passive dispensers and lures containing the kairomone in the tree canopies of apple and pear orchards. Passive dispenser products – including puffers, strips, and twist ties – are housed in a solid delivery system. Dispensers come in various forms (see photos below) and are deployed in varied numbers per acre according to the label and depending on pest pressures within specific areas of the orchard. Dispensers are hung in the spring prior to codling moth emergence and are effective for the whole season. They are generally applied at a rate of between 200 and 400 dispensers per acre and are placed in the upper third of the tree canopy (i.e., within two-to-four feet of the tree top).

Passive dispensers (mister (left), strip (center), and twist tie (right)) hung in a Pacific Northwest orchard.
(Photos provided courtesy Zirkle Fruit Company, September 2024.)

Passive lures containing pear ester are also a critical component of mating disruption and are placed inside monitoring traps. Traps help growers track if any mated moths have moved in from adjacent orchards and to ensure that the pheromone/kairomone is successfully disrupting mating. Lures with pear ester have been shown to catch both female and male codling moth, whereas pheromone lures catch only male moths. Prior to the availability of pear ester-based products, codling moth monitoring was less effective, as it offered monitoring of male codling moth populations only. By using a different semiochemical that attracts and traps female moths, Codling Moth Decadienoic Acid (CMDA) lures provide a more comprehensive assessment of the female population within a mating-disrupted orchard and where they are located, as well as a tool to measure the mating status of trapped females. The ability to accurately assess female populations is a vital aspect of overall management decision-making and is only made possible by the pear ester lures and dispensers.



A CMDA lure (left), a CMDA lure placed inside a trap (center), and a monitoring trap containing the lure (right) hung in a Pacific Northwest orchard.
(Photos provided courtesy GS Long Company, September 2024.)

Again, passive lures and dispensers do not contain any microencapsulation. Microencapsulated formulations are used in spray mechanisms, primarily in what are referred to as “airblast” sprayers (see photos below). Products such as DA MEC use the microencapsulated pear ester formulations. Should the Board decide to prohibit microencapsulated formulations, we urge the Subcommittee to keep the annotation to specifically and exclusively reference these sprayable products and not the passive products.

Examples of “airblast” sprayers in a Pacific Northwest orchard.

(Photos provided courtesy the Washington Tree Fruit Research Commission)

<u>Importance of Pear Ester-Based Mating Disruption</u>

Of the dozens of insect pests that have the potential to make fruit unfit for consumption, the codling moth (*Cydia pomonella*), a non-native species, is the principal pest of pome fruit in the Pacific Northwest and is classified as a quarantine pest. Codling moth causes significant damage to apples and pears, primarily because the larvae feed directly on the fruit. If left uncontrolled, crop losses caused by larval feeding are typically 80 to 90 percent (Thomson et al., 2001). Tree fruit growers in our region have reported an increase in codling moth pressures in recent years. The increasing frequency of a third generation (historically, two have been most common), means that growers must remain vigilant throughout the growing season.

Female codling moths produce a pheromone that enables males to find them when they are ready to mate. Mating disruption entails dispensing synthetic codling moth sex attractant (i.e., pheromone or kairomone) into an orchard via a passive dispenser or lure to prevent or delay males from mating with females. Every day a female codling moth is delayed in mating, the less likely she is to mate. And if she does mate, she’ll provide fewer eggs to the next generation. Combating the first generation of codling moth is critical in mitigating potential future populations.

Pheromone-based mating disruption is a method of control that has become widely adopted by both organic and conventional tree fruit growers due to its high efficacy and low toxicity to humans, natural enemies, and the environment. It is now the foundation of apple and pear Integrated Pest Management (IPM) programs. Mating disruption enables growers to apply fewer sprays than would otherwise be necessary, as companion pesticide sprays can be limited to identified hotspots in the orchard rather than the entire orchard. By using pear ester-based products, tree fruit growers can often treat as little as 10 percent of an orchard and achieve good control of codling moth. Using these pear ester-based products results in increased control of codling moth, decreased fruit damage, and fewer pesticide sprays in the orchard, as well as makes for a more efficient organic program by improving the ability to determine the best time and place to apply pesticides.

<u>Lack of Alternatives</u>

Codling moth management in organic orchards is exponentially more difficult without the use of pheromone-based mating disruption. That is why more than 90 percent of the apple and pear acreage in

Washington state uses codling moth mating disruption. For organic tree fruit producers, the number and kinds of organic pesticides allowed for codling moth control are limited, therefore control is more challenging and damage to the fruit is often much higher than in conventional operations. The insecticide spinosad (trade name Entrust®) is one of the few effective organic insecticides, but the number of applications per season is restricted by the label. Other botanical and biological insecticides have been less effective at controlling codling moth in organic orchards. The pear ester-based passive dispenser and lure products within this petition are considered by many tree fruit growers to be the most effective codling moth mating disruption products on the market today, while making overall codling moth control strategies less disruptive to the environment.

Without pear ester-based tools, pest monitoring would be less efficient and reliable. Organic growers would have fewer and less effective options for determining when and where to spray insecticides, thereby increasing the number of sprays to manage codling moth and stressing the management of insecticide resistance development. All tree fruit growers, but organic growers in particular, have been reporting an increase in codling moth pressures in recent years. Pheromone dispensers and lures containing pear ester provide the only ability to assess and manage both male and female codling moth populations. Pear ester improves monitoring capabilities, which enables proper timing of sprays, thus decreasing the total number of insecticide sprays and limiting the potential loss of fruit to codling moth-related damage. Reduced sprays mean fewer trips through the orchard, which means fewer greenhouse gas emissions.

Summary

The NHC appreciates the Board's thorough and deliberative handling of this petition, including your efforts to better understand how mating disruption works in organic orchards. While we continue to support adding synthetic pear ester to the National List, we ask the NOSB to refer the pear ester petition back to the Crops Subcommittee. This will allow the Subcommittee to correct the annotation so that passive dispensers and lures can continue to be used. Then the full Board can vote on the corrected listing at the spring 2026 meeting. We suggest the annotation only reference the prohibition of microencapsulated formulations. The NOSB must avoid inadvertently prohibiting the critical mating disruption products that contain pear ester and provide organic tree fruit growers with a highly safe and effective tool for combating a principal insect pest in their orchards.

2027 Crops Sunset Reviews

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

§205.601(a)(2)(iv) Potassium hypochlorite – for use in water for irrigation purposes

The NHC supports the continued listing of potassium hypochlorite for use in water for irrigation purposes. It is used by the majority of Pacific Northwest tree fruit growers for several important uses.

Potassium hypochlorite is used to help to keep micro-sprinklers and fogging systems functioning properly and to prevent clogging within the irrigation system. 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. It is also worth noting that this product provides a hypochlorite option that does not contain sodium content, which, as the subcommittee noted, helps to avoid the salinization of soils associated with sodium hypochlorite, therefore making it a preferred option over sodium-containing alternatives.

§205.601(a)(7) Soap-based algicide/demossers – as algicide, disinfectants, and sanitizer, including irrigation system cleaning systems

These products are used as algicides, disinfectants, and sanitizers for tools in the orchard, including irrigation systems. Pacific Northwest tree fruit growers consider this an important tool for combatting food-borne pathogens and assisting in compliance with the Food Safety Modernization Act's Produce Safety Rule. The NHC supports the continued listing of this material on the National List to support irrigation system sanitation.

§205.601(e)(1) Ammonium carbonate – for use as bait in insect traps only, no direct contact with crop or soil

The NHC supports the continued listing of ammonium carbonate, which is used by some Pacific Northwest organic tree fruit growers as an attractant in insect traps. Ammonium carbonate is especially effective in orchard traps used to monitor various types of flies. Traps baited with ammonium carbonate represent a highly effective approach to monitoring apple maggot (*Rhagoletis pomonella*), a quarantine pest of apples, in the Pacific Northwest. (Wee et al., 2014). They also have high efficacy in trapping cherry fruit flies (*Rhagoletis cerasi*), a quarantine pest of cherries in our region (Wee, 2018). Routine biological monitoring of pest insects, including baited traps, is the foundation of organic pest management, allowing growers to know what pests are present, when they are present, and at what population levels they are present. Ammonium carbonate provides an effective tool for trapping and monitoring quarantine pests.

§205.601(e)(8) Soaps, insecticidal – as insecticides (including acaricides or mite control)

Insecticidal soaps are an essential tool for organic tree fruit production and used by the majority of Pacific Northwest growers. The main active ingredient of insecticidal soaps is potassium salt of fatty acids. Commercial insecticidal soaps are selective to control insect and mite pests, and minimize the potential for plant injury. These soaps are key to many IPM programs for controlling soft-bodied insect pests, such as aphids, mealybugs, and spider mites. They kill by contact and have no residual effect; hence sprays must be applied directly to and cover the pests thoroughly. In some instances, the target pests are not killed, but are removed from the tree canopy foliage. This material provides organic growers options to initiate a "soft" soap-based pest control program early in the season when pest pressures are low, and before stronger biocontrol material options are required. Tree fruit growers always use products according to the label, in this case avoiding potential aquatic contamination. The NHC supports the continued listing of insecticidal soaps on the National List.

§205.601(g) Vitamin D3 – as rodenticides

The NHC supports the continued listing of Vitamin D3 for use as rodenticides. While used sparingly, Vitamin D3 is one of the few materials that organic tree fruit producers can access for rodent control in the orchard. Vitamin D3 can be used in conjunction with other mechanisms, such as mechanical bait boxes, traps, or birds of prey. Availability of Vitamin D3 is especially important in situations where a grower is facing a high rodent population coupled with environmental factors, such as heavy winter snow. It is primarily used around bins and in confined spaces around buildings.

§205.601(j)(1) Aquatic plant extracts – as plant or soil amendments
The NHC supports the continued listing of aquatic plant extracts as plant or soil amendments. These materials are used by a majority of organic tree fruit producers in the Pacific Northwest and are critical for their fertility programs.

Soil- and foliar-applied products are used to enhance soil and plant health, particularly when a nutrient deficiency is identified. Foliar sprays improve red color intensity and distribution in Fuji, Gala, and other apple varieties (Marangoni et al., 2004). The current formulation works well for the type of sprayers utilized in Pacific Northwest tree fruit production and provides a material that is consistent in quality.

Aquatic plant extracts are also an effective tool for reducing alternate bearing in organic fruit trees. In organic orchards, there is no alternative to the expensive and time-consuming process of hand-thinning, therefore the natural plant growth regulators in seaweed extracts make them an important tool. These products can help to decrease the oscillations in yield between "on" and "off" years and increase the average fruit weight on trees affected by a higher crop load (Spinelli et al., 2009). Orchards with these amendments can have higher leaf chlorophyll contents and increased rates of photosynthesis and respiration.

§205.601(j)(4) Lignin sulfonate – as chelating agent and dust suppressant
The NHC supports the continued listing of lignin sulfonate as both a chelating agent and dust suppressant. It is used by Pacific Northwest tree fruit growers for dust abatement in select areas as needed. Dirt roads along the borders of farms can be habitats for mites. Pest mites can get under the dust, but predator mites do not. Using dust suppressant materials reduces the potential need to spray to combat pest mites. Dust suppressants are also used on driveways and loading areas that have higher dirt content than gravel.

Lignin sulfonate is still used by Pacific Northwest tree fruit growers as a chelating compound for foliar-applied nutrients. It helps to reduce fruit russeting and to minimize other potential damage to fruit and foliage. It improves nutrient uptake through the foliage of the plant, assisting with absorption of critical nutrients (such as iron, copper, zinc, manganese, molybdenum, nickel, boron, and silicon), enhancing overall fruit growth and yield (Madhupriyaa et al., 2024). Lignin sulfonate's compatibility with other materials helps to ensure the application of these nutrients are efficient for crop utilization, thus increasing the effectiveness of nutrients applied and therefore reducing overall sprays. Reduced sprays mean fewer trips through the orchard, which means fewer greenhouse gas emissions.

§205.601(l) Sodium silicate – as floating agents in postharvest handling, for tree fruit and fiber processing
The NHC supports the continued listing of sodium silicate on the National List, as it is still an essential tool for some tree fruit packers – in many cases, smaller operations – as a floating agent.

Sodium silicate is used by fresh pear packers – who do not have access to a mechanized process – as a floating agent to allow pears to float onto packing line equipment. There is no alternative, absent substantial investments in mechanization that is not possible for many small operations. Independent packers rely on older lines because they do not have the ability to pay for expensive, new equipment. Changing to a "dry" system is not a viable alternative. Any requirement to switch to a dry system would directly and negatively impact small operations. This is precisely why this material is still necessary for organic pear packing. Pear grower returns have increasingly struggled to keep up with the cost of production over the last two decades, so limiting expenses is crucial to survival.

The subcommittee refers to alternate substances, such as calcium chloride, potassium carbonate, sodium carbonate, and sodium sulfate. These chemicals are not viable alternatives because they can cause damage to the pears. There are multiple scenarios where those chemicals cause damage, in particular if the fruit is left soaking in water that contains them, should there be an equipment failure, for example. Other equipment upgrades referenced, such as foam coated belts, are not available or compatible with existing packing lines, or economically viable to purchase and install.

The subcommittee posited a question regarding sodium silicate's interaction with chlorine materials. As a common additive in water systems, there is good evidence to show that chlorine-based sanitizers (i.e., hypochlorites) retain activity in the presence of sodium silicate, as long as target-free chlorine concentrations are achieved (Critzer, 2025). The loss of sodium silicate would directly affect small-sized pear growers and packers who do not have the capital to upgrade their equipment. While not used by a majority of pear handlers, it is essential for those whose packing systems still depend on it.

§205.601(m)(1) EPA List 4 – Inerts of Minimal Concern

The NHC supports the relisting of EPA List 4 Inerts to the National List until they are replaced with a new listing via the rulemaking process currently underway by the NOP. We agree with the subcommittee that List 4 inerts must remain listed during the rulemaking process in order to maintain continuity in pesticide formulations used by organic growers. Inerts listed in both EPA List 3 and List 4 are critical to organic tree fruit production and we look forward to the opportunity to provide comment to the NOP during rulemaking. The NHC appreciates the deliberative process the NOSB conducted in supporting and advising the Program as it works to replace the List 3 and 4 references in organic regulations.

§205.601(o)(2) Paper-based crop planting aids

Different paper-based crop planting aid products are used for different purposes in organic tree fruit production in the Pacific Northwest. They are used by orchard operations of all sizes, as well as by fruit tree nurseries. Nearly all tree fruit growers use cardboard bands, also known as collars or tree guards, at the base of the tree trunk. Paper-based tree guards help to prevent codling moth and other insect pests from crawling up into the tree and causing damage, to deter mice that enter the orchard and can damage young trees in particular, and to protect trees from the heat of weed burners. Occasionally, nursery stocks provided as quick starts come in paper-based pots. As more and more growers use quick starts, these products can be an effective way to reduce plastics in nursery production. The NHC supports the continued listing of paper-based crop planting aids on the National List.

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

§205.602(b) - Arsenic

The NHC supports the continued listing of arsenic as a prohibited material.

§205.602(i) - Strychnine

The NHC supports the continued listing of strychnine as a prohibited material.

Handling Subcommittee (HS)

2026 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))."

§205.605(a)(15) Kaolin – as a filtration component

The NHC supports the continued listing of kaolin as a filtration component in the manufacture of organic fruit juices. The material is used as a filtering aid in apple and grape juice processing. In particular, some newer apple varieties, such as Honeycrisp, have a porous cell structure that tends to make for a pulpy juice when first pressed. Maintaining the ability to use kaolin will benefit growers by allowing the juice companies to provide consumers with a standard, clear fruit juice.

§205.605(b)(21) Ozone – as a disinfectant and sanitizer

Ozone is widely used as a disinfectant and sanitizer in tree fruit packinghouses and storage facilities throughout the Pacific Northwest. It has been used successfully in flume water in apple and pear packinghouses for decades. Ozone is a highly effective disinfectant and an important tool for organic producers in controlling potential cross contamination of microbial pathogens that pose a food safety risk in water or on food contact surfaces.

Ozone can minimize chemical and microbial contamination of wash water that contacts the fruit during postharvest handling (Smilanick et al., 1999). This includes water within dump tanks, flotation solutions, brush bed spray bars, or other process water that contacts the fruit during postharvest handling. Use of ozone helps prevent cross contamination of microbial pathogens that may be isolated on one fruit coming in from the orchard from spreading to the rest of the fruit running through the line. Ozone is also used to control the microorganisms that cause decay, such as blue mold, by reducing the ability of these decay microorganisms to become established in bins of fruit in storage and spread to other bins.

Ozone has been considered GRAS by both the FDA and USDA for more than 20 years. It leaves no chemical residue and returns to a stable oxygen state within seconds after application. Ozone is key to assisting handlers in complying with the requirements of the Food Safety Modernization Act (FSMA). Multiple products are necessary to accomplish compliance with FSMA, while managing against the evolution of microbial resistance to any one product. Ozone is an important component used in this rotation to disinfect and sanitize storage and handling facilities. The NHC supports the continued listing of ozone on the National List.

§205.606(a) Carnauba wax – as fruit coating

The NHC supports the continued listing of carnauba wax on the National List. Carnauba wax is used by apple and pear handlers in the Pacific Northwest on an as-needed basis to protect against decay with certain pome fruit cultivars. It can also reduce scuffing on pears during the packing process, which becomes increasingly important when the fruit becomes more delicate later in the season. Carnauba wax is applied after the fruit is washed and dried, and only where needed. While used sparingly, carnauba wax is an important and necessary tool for tree fruit handlers in certain circumstances. It is a naturally occurring substance and does not pose a safety concern for human health or the environment.

§205.606(n) Orange shellac – as fruit coating

The NHC supports the continued listing of orange shellac on the National List. While not often used in pome fruit handling, orange shellac is an important tool for those handlers who use it in rotation with other fruit coatings on their organic crops. Like carnauba wax, it is applied in the packinghouse after the fruit is washed and dried. Orange shellac provides a natural protective layer that maintains appearance, helps reduce shrivel, and supports quality retention during storage and distribution.

Materials Subcommittee (MS)

Discussion Document: Research Priorities 2025

The NOSB's annual list of organic food and agriculture research priorities is an example of the organic industry's forward-thinking approach to challenging issues, and the NHC generally supports the NOSB's 2025 research priorities.

Many of the research priorities would benefit organic tree fruit production, including, but not limited to: collaboration with research commissions, universities, and the IR-4 project to research new organic pesticide products and cultural control methods to manage pests and diseases; funding of commodity- and region-specific life cycle assessments (LCAs) to better understand carbon footprints and help identify practices that reduce greenhouse gas emissions; increasing availability of sustainable fruit packaging and biodegradable planting aids; and improving methods and practices for organic handling and processing, particularly the effectiveness of rotational use strategies with sanitizers. Additionally, the Subcommittee should add to the NOSB priorities list research into postharvest physiology and postharvest decay management to support the critical need to better understand postharvest issues in organic fruit, thereby reducing food waste.

We also recommend the NOSB develop mechanisms for incentivizing funding of these research priorities, necessary follow-up, and distribution of key learnings to industry. Many of these priorities have been on the NOSB's list for years with little or no significant progress. The NOSB and NOP should be actively engaging land-grant universities and research grant programs (government, non-profit, etc.) to help ensure priority projects are being funded and completed. NOSB members, NOP staff, and organic stakeholders should receive updates on which priorities are being studied, how those research projects are progressing and if further guidance is needed, and when the research is published.

Policy Development Subcommittee (PDS)

Policy and Procedures Manual (PPM) Revision Proposal

The NHC supports the proposed changes to the PPM under Section III. J (3) Failure to Participate. We agree with the Subcommittee that the NOSB chair should have the authority to request that the Secretary remove a board member for extreme nonparticipation. The reasons for which should include, but not be limited to, repeated failure to participate in subcommittee work, failure to communicate expected absences, and three or more unexcused public meeting absences.

Chronic absence of an NOSB member is detrimental to the Board's ability to fully execute its duties and agenda, as well as the overall workload of each member – which is significant even with all 15 members active. However, most importantly, chronic absence is a detriment to the constituents that member is appointed to represent. Each member of the NOSB agrees to serve on behalf of the stakeholders for that seat and, without them, that sector of organics is done a great disservice.

It is not unprecedented for new appointees to the Board to resign due to the heavy workload or other factors. What is unprecedented is allowing chronically absent members to stay on the Board long after it has become clear they have no intention of either fulfilling their duties to the organic industry or resigning. We support the PPM having language that clearly lays out actionable measures the Board and its chair can take to rectify extreme nonparticipation by members.

Conclusion

The NHC's comments are focused on materials 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 of all sizes – who already have limited pest control tools – to protect against and manage injury from insects, diseases, and microbial pathogens. Without the allowance to use some of these materials, organic regulations could have the unintended impact of forcing Pacific Northwest tree fruit growers and packers out of organic production, particularly small commercial growers.

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

cc: NHC Science Advisory Committee and Organic Subcommittee

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