

Benham, Katherine

From: Pooler, Bob
Sent: Monday, April 21, 2003 11:17 AM
To: Strother, Toni; Neal, Arthur; Hayden, Beth; Ashley, William; Wilson, Demaris; Benham, Katherine; Jones, Keith; Mathews, Richard; Rose Koenig ; Ann Cooper; David Carter; Dennis Holbrooke; Nancy Ostiguy; Owusu Bandele; Rebecca Goldberg; George Siemon; James Riddle; Michael Lacy; Rebecca Goldberg; T. Mark King; Goldie Caughlin; Kevin O'Rell; Kim Burton
Subject: FW: Req. Exemption NOP rules for Novodor

Comments on biopesticide product containing list 3 inerts

-----Original Message-----

From: Materials, NOSB
Sent: Wednesday, April 16, 2003 5:53 PM
To: Pooler, Bob
Subject: FW: Req. Exemption NOP rules for Novodor

From: Ave, Dirk[SMTP:DIRK.AVE@VALENT.COM]
Sent: Wednesday, April 16, 2003 5:50:37 PM
To: Materials, NOSB
Cc: bfraser@ota.com%INTER2; Emily Brown Rosen (E-mail);
info@ota.com%INTER2; organic@organicvalley.com%INTER2;
Robert Torla (E-mail)
Subject: Req. Exemption NOP rules for Novodor
Auto forwarded by a Rule

Dear NOSB Materials Committee Members,

The attached documents contain requests for the continued use of the *Bacillus thuringiensis* based product Novodor for control of the Colorado Potato Beetle in organic potato production. The current Novodor formulation contains EPA List 3 inerts as preservatives. A modified formulation is being worked on by our researchers, however since the project lacks financial incentive it was started late and was obviously not completed before the NOP rules went into effect last October. The request would be for an extension of the use of the current Novodor product during the 2003 growing season. An organic version of Novodor is planned for introduction in 2004. Although the market for Novodor is small, you will notice from the attached letters that the users of Novodor are very vocal, not in the least part because there is no other *Bacillus thuringiensis* based biological control of the Colorado Potato Beetle available. The attached comments are from interested parties in Canada, the USA and Mexico.

The 2003 growing season is upon us and I am asking (pleading) for a quick resolution on behalf of the organic growers depending on Novodor. I looking forward to your response.

Kind regards

Dirk Avé
Project Manager Bt Ag & DiTera
Valent Biosciences Corporation
870 Technology Way
Libertyville, IL 60048
Phone: 847-968-4722
Fax: 847-968-4801
e-mail: dirk.ave@valent.com

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Novodor Canada
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W3583 Artesian Road
Fond du Lac, WI. 54935
8 January, 2003

Mr. Dirk Ave
Valent Bio-Sciences
870 Technology Way
Libertyville, IL. 60048

Dear Mr. Ave,

This letter has been written to encourage your colleges at Valent Bio-Sciences to not only continue production of your Novodor insecticide but also gain OMRI approval for organic crop production purposes.

The encouragement I hope, will be in the testament to follow. Novodor works: plain and thorough. Which stands in contrast to all the rest I've tried in seeking to control beetle and caterpillar infestations in our farm's potato and brassica fields. And in discussion with my fellow growers at market and at conference, when the subject comes up- as it does, invariably- I recommend Novodor by name and emphasize its cost effectiveness and reliability.

However, since implementation of the National Organic Program in October of 2002, I now also need to be able to say, "Novodor is also cleared for organic production." A task often difficult enough without losing so effective a tool as was Novodor Bt to our farm. So please do still provide Novodor to an ever expanding organic acreage.

Thank you for your consideration.

Sincerely,



Bruce Braun
Owner/Operator
Artesian Road Living Foods



Mr. Robert F. Torla
National Organic Program
United States Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

December 18, 2002

Ref: Letters of support for one year exemption of Novodor from NOP Rules.

Dear Mr. Torla,

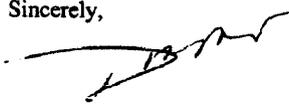
Enclosed you will find several letters of support from organic growers on behalf of Novodor. This product is currently not in compliance with NOP Rules as biological insecticide for control of the Colorado Potato Beetle, however since it's introduction many years ago it has been the only biological control method available to organic growers.

In our e-mail exchange about Novodor (Nov 8, 2002) and as follow-up on the subject, I am presenting support documentation in order to make a strong case to allow certified organic growers the use of the current Novodor product for one more season.

Novodor has support from Maine to Washington, up in Canada and down to Mexico, and although the organic acreage is small in comparison to other crops Valent BioSciences decided to keep manufacturing the product in light of difficult marketing opportunities. In fact, we are committed to develop an organic formulation compliant to the NOP Rules and Guidelines. The one-year extension will give us time to modify the current formulation and do preliminary field tests.

Please accept the support documentation for Novodor in order to substantiate discussions on the impact of the National Organic Program.

Sincerely,



Dirk Avé
Project Manager
Valent BioSciences

Enclosures



NATURE'S CIRCLE FARM

October 29, 2002

Mr. Dirk Aze
870 Technology Way
Libertyville, IL 60048

My name is Dick York, I own Nature's Circle Farm where we raise about 50 acres of certified organic

I'm writing this letter because we need to continue using Novodor to fight the Colorado Potato Beetles. This year, because of Novodor H. CDP we did not have a significant negative impact on our potatoes or eggplant. Without it, I don't know how we could continue to produce over 20 acres of organic potatoes and eggplant.

Please petition the USDA to allow the use of Novodor under its organic Rule for at least one more year.

Sincerely,
Dick York

Ave, Dirk

From: Leggett, Michael
Sent: Wednesday, April 16, 2003 11:29 AM
To: Ave, Dirk
Subject: Contacts Novodor

Follow Up Flag: Follow up
Flag Status: Flagged

Dirk,

Sorry for the delay,

Av Singh, asingh@nsac.ns.ca, Extension coordinator Organic Agriculture Centre of Canada. Tel. (902) 893 6275.
Kevin McCully, kevin.mccully@gnb.ca, Manager IPM Section New Brunswick Agricultural Development (Weed Specialist - can forward to right body).

Mike

Theojary Crisantes Enciso
C O P R O P I E D A D

Address: Km. 7.5 Carr. a Navolato
Culligan, Sinaloa, México
Sociedad Anónima Carr. Nog-Hillo. Km. 213
Izamal, Sonora, México
Tel. (632) 602 32 Fax. (632) 602 31
RFC: CRET-458813-318

August 16, 2002

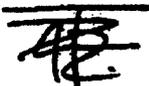
Dirk Ave
Valent Bioscience
Tel (847) 968-4722
Fax (847) 968-4801

Dear Dirk:

Thank you for your letter dated August 16, 2002. As I learned from the information you sent me Novodor contains some preservatives that appear on EPA list 3 of inert material. Also due to the unique status of Novodor you have the option to petition NOSB for an alternative approach. I want to strongly encourage you to make such petition with NOSB. It would be a big loss to the organic industry if Novodor is taken out of the approved substance list.

You have all my full support on this petition; please call me if there is anything I can do to help you.

Sincerely



Ricardo D. Crisantes



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

October 7, 2002

Dirk Avé
Project Manager Bt Ag & DiTera
Valent Biosciences Corporation
870 Technology Way
Libertyville, IL 60048

Dear Dirk:

Novodor has traditionally been allowed for use in organic farming systems by the RI Division of Agriculture, and is an important tool for organic farmers in Rhode Island. In a year when Colorado Potato Beetle populations are high, they can easily decimate a potato crop, even when other control options are used. Because there is no organic alternative to the present formulation of Novodor, we would support a decision by the NOSB to allow the use of Novodor if it can be done without compromising the National organic standards.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dan Lawton".

Dan Lawton,
Supervisor, Insect Pest and Plant Disease Control
RI DEM Division of Agriculture and Resource Marketing
Rhode Island Organic Certification Committee

cc: Dennis Martin
Sr. Environmental Scientist
Ken Ayars
Chief