

Mathews, Richard

From: Johnathan Edelson [jedelson-okstate@lane-ag.org]
Sent: Thursday, March 07, 2002 11:36 AM
To: Mathews, Richard
Cc: lwalton@dow.com%inter2
Subject: Spinosad petition

Dear Mr. Mathews:

I am writing to you in regards to a pending decision on registering spinosad products for organic production under USDA regulations. I am a research entomologist and have spent most of my career developing IPM programs for commercial vegetable crop producers in the southern U.S. A significant group of the producers is of course focused on organic production. I have also worked for several years with spinosad products in small replicated trials determining efficacy and developing use patterns for producers.

I am convinced that the products are excellent in terms of targeted efficacy for managing lepidopterous and thrips pests of vegetable crops. My review of the safety information indicates that the materials are environmentally benign and of extreme low toxicity to non-target organisms including humans. I would not hesitate to recommend the products for commercial or home owner use whether the target market is organic or not. Based on review of current labels for organic pesticides including those for B.t. products it appears to me that the spinosad products fit the same niche in terms of efficacy and environmental effects.

The organic producers have great need for this product as a choice in developing an insecticide resistance management strategy as insects including the diamondback moth increasingly come under pressure and develop resistance to the B.t. products.

If you have questions feel free to contact me

Jonathan Edelson, Professor of Entomology
Oklahoma State University
jedelson-okstate@lane-ag.org

4-12-02

RE: APPROVAL TO USE "SPINOSAD" ON ORGANIC
CERTIFIED CROPS BY N.O.S.B.

TO: MS. KATHERINE BENHAM
FAX NO. 202-205-7808
E-MAIL KATHERINE.BENHAM@USDA.GOV

FROM: RON GOEBEL, PRESIDENT
GOEBEL ORGANICS, INC.
1310 S. HWY 208
COLORADO CITY, TX 79512

DEAR MS. BENHAM

I WOULD APPRECIATE YOU JOINING ME
IN GETTING APPROVAL OF THE USE OF "SPINOSAD"
ON ORGANIC CERTIFIED CROPS BY N.O.S.B. FOR
THE ~~##~~ CONTROL OF BEET ARMY WORMS AND
BOLLWORMS. THIS PRODUCT IS EFFECTIVE ON THESE
AND OTHER PESTS, AND IS GENTLE TO
BENEFICIAL INSECTS AND HAS A LOW TOXICITY

RESPECTFULLY,
Ron Goebel

Benham, Katherine

From: Betty Bingham [cbingham@poka.com]
Sent: Tuesday, April 09, 2002 2:45 PM
To: Benham, Katherine
Subject: Support for the substance Spinosad

Dear Katherine Bonham and National Organic Standards Board,

I am writing in support of the petition for the inclusion of Spinosad on the NOSB list of approved organic substances. From an organic farmer's perspective, Spinosad is very effective in controlling insect pests (beet army worms and bollworms), has very low to no impact on beneficial insects, has very low toxicity to environment (short time before reentry), and is cost effective.

Sincerely,
Cliff Bingham

Bingham Organic Farm
Rt. 1, Box 67A
Meadow, TX 79345
Home phone: 806-585-6365
Fax: 806-585-6365
Mobile: 806-893-8693
Email: cbingham@poka.com

Dates that I would be available to make comments in support of Spinosad are:
May 7th, anytime after 2:00 pm (this day is my preference) or May 8th
(anytime that day)



April 8, 2002

Bastiaan "Bart" M. Drees
Coordinator

412 Minnie Bell Heep Bldg.
Texas A&M University
College Station, TX
77843-2475

Phone: 409/845-5895

Fax: 409/845-7029

E-mail: b-drees@tamu.edu

Web: fireant.tamu.edu

Memorandum to: Mr. Richard Mathews
Acting Program Manager
USDA-AMS-TM-NOP
Room 2510-South Building
1400 and Independence Avenue, SW
Washington, DC 20250-0020
Telephone: (202) 720-3252
Fax: (202) 205-7808

Subject: Spinosad Petition

Dow AgroSciences has submitted a petition for the organic certification of the active ingredient Spinosad to the USAD office of National Organic Standards Board (NOSB) last summer. The NOSB will consider this petition during their meeting on May 7, 2002 in Austin, Texas. The Dow AgroSciences petition is now posted on NOSB web site <http://www.ams.usda.gov/nop/> for comments. This memorandum was developed to support the organic certification of spinosad.

Justice Fire Ant Bait is registered for use to control red imported fire ants in a number of sites including pastureland and landscapes. This is one of the few bait-formulated ant bait products that could be considered "organic" because of its origins and formulation. In responding to public pressure to develop "organic" fire ant control products, we support the organic certification of spinosad by NOSB. For additional information about fire ant control a organic control options, visit <http://fireant.tamu.edu> and see under "materials" and "fact sheets" FAPFS012. Please contact me if you need additional support information.

Sincerely,

Bastiaan M. Drees,
Professor of Entomology and
Texas Fire Ant Project Coordinator

Texas Imported Fire Ant Research & Management Plan

Texas Agricultural Experiment Station • Texas Agricultural Extension Service • Texas Parks and Wildlife Department
Texas Department of Agriculture • Texas Tech University • The University of Texas

Together We Can Lessen the Sting of the Fire Ant Problem

QUINCO INC.

P O Box 1552 Marysville, CA 95901

Mr. Richard Mathews
Acting Program Manager
USDA-AMS-TM-NOP
Room 2510-South building
1400 and Independence Avenue, SW
Washington, DC 20250-0020
Re: Spinosad petition

Dear Mr. Mathews:

I am writing to urge the granting of certified organic status for the active ingredient Spinosad.

I am an organic walnut grower in Northern California. Our farm is certified by CCOF. The 2001 walnut crop, which was harvested in October, was our first certified organic crop. Unfortunately, it was severely damaged by Walnut Husk Fly. The damage was so extensive that the nuts that were salable were worth only about half of the value that they would have brought without damage. In addition to the decreased market value, I estimate that we suffered the complete loss of approximately 15 to 20 percent of the crop.

The extent of the damage that we sustained was entirely unexpected. We had no Husk Fly damage before beginning our conversion to organic growing. We saw almost no damage to the 1999 crop (the first season of transition toward certified organic status). The 2000 crop (our second season of transition) suffered minor damage but the damage was not significant enough to cause any reductions in our revenue received from the conventional handler who purchased the crop. Apparently, we had a major change in Husk Fly populations between the 2000 and 2001 crops. Our pest control advisor indicated that he had never seen a population quite like it.

We have no material allowed under organic rules with which to treat. Our alternatives were to spray with a non-organic material and lose our organic status. Or we could choose to do nothing and keep the organic status. We chose not to spray. The thought of losing all of the organic effort and cost that we had invested over the past 3 years was devastating. We had too much invested to quit.

Given the size of the population last year, it is unlikely that we can be successful in the future without a material to reduce the pressure from this insect. Your decision regarding Spinosad might very well determine whether or not we can continue to farm our walnuts organically. Please don't drive growers like ourselves back into conventional agriculture because we can't afford to sustain the huge losses which Spinosad can prevent.

Spinosad appears to be a perfect material for organic growers. It is a naturally derived, naturally occurring organism. It persists for a relatively short time and poses little risk of toxicity. Finally, it will control many insect pests that are not currently controlled by existing organically certified products thereby allowing more food to be grown organically.

Sincerely,



Mike Notland

General Manager



David Granatstein, Center for Sustaining Agriculture and Natural Resources, WSU, 1100 N. Western Ave.,
Wenatchee, WA 98801; Tel. (509) 663-8181 x.222 FAX (509) 662-8714 Internet: granats@wsu.edu

Date: April 1, 2002

Mr. Richard Mathews
Acting Program Manager
USDA-AMS-TM-NOP
Room 2510-South Building
1400 and Independence Avenue, SW
Washington, DC 20250-0020
Telephone: (202) 720-3252
Fax: (202) 205-7808

RE: Spinosad Petition

Dear Mr. Mathews,

I would like to submit this letter in support of NOSB approval of spinosad for organic farming use. Given that organic farmers have relatively few effective pest management tools, access to a low-risk material such as spinosad is important. As in any pest management program, organic growers need a range of tools so they can practice effective resistance management. Since spinosad's mode of action is unique, this is a compelling reason to make the product available.

Spinosad may be able to help manage a range of insect pests for which there are no good organic controls at present. I can think of cherry fruit fly here in the state of Washington. Spinosad has shown good activity against this pest, one for which there is zero tolerance in certain geographical markets. Organic cherry acreage is set to double in 2002 in the state. The current control measure, a pyrethrin product, is not terribly effective. It is often used in 5 day intervals over a number of weeks. Spinosad could be key tool for the expanding organic cherry production.

I remember how organic apple growers used to spray ryania up to 20 times per season in an attempt to control codling moth. Then pheromone mating disruption was introduced and it has led to dramatic expansion and improved quality of organic apples. I believe that spinosad could play a similar role for organic cherries, as well as many other crops.

Thank you for considering my comments

Sincerely,

A handwritten signature in cursive script that reads "David Granatstein".

David Granatstein
Sustainable Agriculture Specialist

DEPARTMENT OF FOOD AND AGRICULTURE

1220 N Street, Room A-316
Sacramento, CA 95814
Telephone: (916) 654-0317
Facsimile: (916) 654-1018



March 19, 2002

Mr. Richard Mathews
USDA-AMS-TM-NOP
Room 2510-South Building
1400 and Independence Avenue, SW
Washington, DC 20250-3252

Dear Mr. Mathews:

The California Department of Food and Agriculture (CDFA) supports the petition of Dow Agrosciences to register the active ingredient Spinosad as an organic insecticide with the National Organic Standards Board.

The Department administers a comprehensive plant pest and prevention program including exclusion, detection and eradication. Infestations of exotic fruit fly pests, such as the Mediterranean fruit fly (Medfly), are occasionally found in California and require eradication. In the past, the material of choice has been Malathion. However, since the treatment area often includes organic growers the use of Malathion has been contentious. If Spinosad is registered as an organic material it will enable us to more easily treat organic crops in the course of our eradication programs.

Organic certification would also facilitate our pest exclusion efforts in that the MOSCAMED (Medfly control and/or eradication) programs in Southern Mexico, Guatemala and Central America would be encouraged to use Spinosad in the fruit fly treatment programs in those countries. The use of an organic material would allow a broader use pattern within a more comprehensive program, thus lowering the risk of fruit fly infestations in crops destined for the North American market. The U.S. Department of Agriculture's National Organic Standards Board certification of Spinosad would encourage Mexico and other Central American countries to pursue certification.

Thank you for the opportunity to comment. As I said in my opening paragraph, the CDFA strongly supports the certification of Spinosad as an organic material. If you would like further information please contact me.

Respectfully,

A handwritten signature in cursive script that reads "Don Henry".

Don Henry
Director
Plant Health and Pest Prevention Services

cc: S. Mauch

MR 1 12:26



March 22, 2002

Mr. Richard Mathews
Acting Program Manager
USDA-AMS-TM-NOP
Fax: 202/205-7808

Dear Mr. Mathews;

I have just returned from a trip overseas and have read with great interest about the potential for organic control of the olive fly. I am writing to express my support for organic certification of "Spinosad" for control of the olive fruit fly. This pest has the potential to devastate both the table olive and olive oil industries in California. "Acceptable" levels of olive fly damage for the table olive industry are 2% or less; for the oil industry, 5-10% is the maximum degree of damage that will permit production of a virgin olive oil. Last year, olive fly damage in parts of California exceeded 100%. Under these conditions, organic table olive production is impossible, and organic olive oil production will be severely compromised.

There is currently no allowed material for controlling this fly organically. Spinosad, a natural soil bacterium cultured and produced for commercial agricultural applications, has been shown to be highly effective against the olive fly. In conversation with certifying agencies, I have found universal support for the certification of the active ingredient of Spinosad.

As an organic grower and producer of California's finest organic extra virgin olive oil, I believe Spinosad is an excellent candidate for certification by the National Organic Program. I urge you to act promptly to approve an appropriate formulation of Spinosad and to enable California's organic olive growers to utilize this material for the 2002 season.

Thank you very much for your attention to this matter of great urgency for California's organic olive industries.

Sincerely,

Mrs. Nan T. McEvoy



MIR25 9:15H

Timothy C Holler
03/07/2002 10:45 AM

To: gtween@aphisguate.com@igw
cc: Sue.d.mccombs@aphis.usda.com, jsivinski@gainesville.usda.ufl.edu@igw
Subject: Support of Spinosad

Gordon:

Per Dr. McCombs, We offer the following information regarding the need for registering SUCCESS as an organic bait for fruit flies.

1. CPHST here in Florida, in cooperation with FDACS - Division of Plant Industry, have been testing a unit, ie. Ladybird (Quest - So. Africa) which will deliver low volumes of pesticides by ground. In initial tests in citrus using sterile Caribbean fruit fly, we have recorded greater than 90% efficacy with less than 48oz per acre of GF-120. We will continue our studies in April and May of this year to further reduce this dose and are confident we can do so (with slight modifications to the product delivery system) and
2. Periferally, working with DPI - Bureau of Methods Development and BioControl, and ARS - Daniel Moreno, Spinosad applied aerially or by ground application, when compared to the standard malithion air/ground treatments was as efficient as or better than the standard in tests using both sterile carib/med flies. You might wish to contact, if you have not already, Don Harris/ Ed Burns regarding their thoughts. They have recently published their findings and
3. In addition to the favorable past/recent past studies ie., Rendo/Vargas, as to the effect on parasitoids of our fruit fly, John Sivinski and I would like to look at other beneficials (some of which are Tephritids) which havenot been yet studied before Spinosad receives my (Our?) full endorsement. Some of this work we would like to initiate This April/May.

Hope this helps you !

Tim

Sue D McCombs
03/06/2002 09:04 AM

To: Timothy.C.Holler@aphis.usda.gov, Joseph L Stewart/FL/APHIS/USDA, Terry E McGovern/FL/APHIS/USDA,
John N Worley/TX/APHIS/USDA, Helene R Wright/CA/APHIS/USDA, Joseph L Davidson/TX/APHIS/USDA,
Robert A Vlasik/TX/APHIS/USDA
cc: Othel.T.Forrester@aphis.usda.gov
Subject: Letters to Support the registration of Spinosad

FYI

From: "Gordon Tween" <gtween@aphisguate.com> on 03/06/2002 07:39 AM CST
Please respond to "Gordon Tween" <gtween@aphisguate.com>

To: <medfly@guate.net>
cc: <Sue.D.McCombs@aphis.usda.gov>, "Stephen A Knight" <Stephen.A.Knight@aphis.usda.gov>,
"Ramon Ochoa" <rochoa@tap.com.mx>, "Oscar Morales" <oscarmor@inteln.net.gt>, "Mangan, Robert"
<rmangan@weslaco.ars.usda.gov>, Jesús Reyes Flores <jreyes@protecnet.go.cr>,
<James.R.Reynolds@aphis.usda.gov>, "Heath, Robert" <miah@ars-grin.gov>, "Heath, Robert"
<rheath@saa.ars.usda.gov>, "Gomes, Patrick J." <pjgomes@aphisguate.com>, "Fernandez Arroyo, Pablo
(PA)" <PFERNANDEZARROYO@dow.com>, "Dr. Roger Vargas" <rvargas@pbarc.ars.usda.gov>, "Dr. Pedro
Rendon" <prendon@gold.guate.net>

Subject: Letters to Support the registration of Spinosad

To All-

THIS IS AN IMPORTANT MESSAGE

Now is the time to send a strong message regarding the need for registering
SUCCESS (spinosad) as an organic bait for fruit flies. After the
meeting in Austin, Texas next month it will be too late. Contact Teung, F.
Chin if
there are any remaining questions on where the letters need to be addressed.

FYI: Attached is the address to send comments to the USDA National
Organic Program for organic spinosad.

http://www.ams.usda.gov/nop/nop2000/nop2/contact_information.htm

Attention: Spinosad Petition
Richard Mathews
Program Manager
USDA-AMS-TM-National Organic Program
Room 2510-South Building
1400 and Independence Avenue, SW
Washington, DC 20250-0020

Telephone: (202) 720-3252
Fax: (202) 205-7808
email: NOPWebmaster@usda.gov

(See attached file: spinsadepa.wpd)

— Original Message —

From: <Teung.F.Chin@aphis.usda.gov>
To: <gtween@aphisguate.com>
Sent: Tuesday, March 05, 2002 5:33 PM
Subject: Spinosad

>
> _____ Forwarded by Teung F Chin/MD/APHIS/USDA on
> 03/05/2002 06:33 PM _____
>
> (Embedded Teung F Chin
> image moved 03/05/2002 06:29 PM
> to file: (Embedded image moved to file:
> pic32697.pcx) pic29477.pcx)
>
>
>
>
> To: "Gordon Tween" <gtween@aphisguate.com>, "Gordon Tween"
> <gtween@aphisguate.com>
> cc: Stephen A Knight/MD/APHIS/USDA@USDA, Susan J
> O'Toole/MD/APHIS/USDA@USDA
>
> Subject: Spinosad
>
> Gordon:
>
> Haven't heard from you regarding the filing of comments to the National
> Organic Program. Our goal was to have them submitted by the end of
> February but there's still time in March.
>
> As you know, the APHIS Grasshopper Program sent in their comments.
>
> Steve Knight said the Citrus Mutual folks will send in theirs.
>
> Let me know if I can be of service for MOSCAMED Guatemala.
>
> I'll touch base with DowAgro tomorrow.
>
> Teung
>
>

Strother, Toni

From: Mathews, Richard
Sent: Monday, April 15, 2002 5:54 PM
To: Strother, Toni
Subject: FW: Spinosad petition

In case I didn't already send this

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

From: Johnathan Edelson [mailto:jedelson-okstate@lane-ag.org]
Sent: Thursday, March 07, 2002 11:36 AM
To: Mathews, Richard
Cc: lwalton@dow.com%inter2
Subject: Spinosad petition

Dear Mr. Mathews:

I am writing to you in regards to a pending decision on registering spinosad products for organic production under USDA regulations. I am a research entomologist and have spent most of my career developing IPM programs for commercial vegetable crop producers in the southern U.S. A significant group of the producers is of course focused on organic production. I have also worked for several years with spinosad products in small replicated trials determining efficacy and developing use patterns for producers.

I am convinced that the products are excellent in terms of targeted efficacy for managing lepidopterous and thrips pests of vegetable crops. My review of the safety information indicates that the materials are environmentally benign and of extreme low toxicity to non-target organisms including humans. I would not hesitate to recommend the products for commercial or home owner use whether the target market is organic or not. Based on review of current labels for organic pesticides including those for B.t. products it appears to me that the spinosad products fit the same niche in terms of efficacy and environmental effects.

The organic producers have great need for this product as a choice in developing an insecticide resistance management strategy as insects including the diamondback moth increasingly come under pressure and develop resistance to the B.t. products.

If you have questions feel free to contact me

Jonathan Edelson, Professor of Entomology
Oklahoma State University
jedelson-okstate@lane-ag.org



SPECTRUM

Organic Products, Inc.

April 17, 2002

Mr. Richard Mathews
Acting Program Manager
National Organic Standards Board
USDA-AMS-TM-NOP

VIA FACSIMILE: 202-205-7808

Dear Mr. Mathews:

I am writing to express support for organic certification of "Spinosad" for control of the olive fruit fly. This pest has the potential to devastate both the table olive and olive oil industries in California. "Acceptable" levels of olive fly damage for the table olive industry are 2% or less; for the oil industry, 5-10% is the maximum degree of damage that will permit production of a virgin olive oil. Under these conditions, organic table olive production is impossible, and organic olive oil production will be severely curtailed.

There is particular urgency at this time, as in order for Spinosad to be effective against the olive fly, it must be applied to the trees prior to pit hardening, which typically occurs in June (this year's growing season is particularly advanced, therefore pit hardening will likely commence even earlier). Without approval before this time, much of the organic olive production in California may be jeopardized.

There is currently no allowed means of controlling this fly organically. Spinosad, derived from a natural soil actinomycete, has been shown to be highly effective against the olive fly. I believe Spinosad is an excellent candidate for certification by the National Organic Program. I urge you to act promptly to approve an appropriate formulation of Spinosad and to enable California's organic olive growers to utilize this material for the 2002 season.

Thank you very much for your attention to this matter of great urgency for California's organic olive industries.

Sincerely,

Neil Blomquist
President

Benham, Katherine

From: Gail Faries [gail@texasorganic.com]
Sent: Wednesday, April 10, 2002 5:09 PM
To: Benham, Katherine
Subject: Spinosad



tmp.htm

Dear Ms Benham,

I am writing on behalf of the Texas Organic Cotton Marketing Cooperative in support of the inclusion of Spinosad on the NOSB list of approved organic substances. The benefits of Spinosad are its cost effectiveness, its effectiveness in controlling insect pests (both beet army worms and bollworms), its low impact on beneficial insects, and its low toxicity to the environment.

Please approve the inclusion of Spinosad to the NOSB list of approved organic materials.

Sincerely,

Gail Faries, CEO
Texas Organic Cotton Marketing Cooperative
2514 82nd Street, Ste D
Lubbock, TX 79423
806.748.8336 Phone
806.748.8302 Fax
806.759.6078 Cell

Mr. Richard Mathews
Acting Program Manager
National Organic Standards Board
USDA-AMS-TM-NOP
Fax #: 202/205-7808

Dear Mr. Mathews:

I am writing to express support for organic certification of "Spinosad" for control of the olive fruit fly. This pest has the potential to devastate both the table olive and olive oil industries in California. "Acceptable" levels of olive fly damage for the table olive industry are 2% or less; for the oil industry, 5-10% is the maximum degree of damage that will permit production of a virgin olive oil. Last year, olive fly damage in parts of California exceeded 100%. Under these conditions, organic table olive production is impossible, and organic olive oil production will be severely curtailed.

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Thank you very much for your attention to this matter of great urgency for California's organic olive industries.

Sincerely,

Deborah H. Kirl
Adobe River Ranch
1281 Fourth St.
Monterey, CA 93740
tel: (831) 657-9005
fax: (831) 657-9012

in fullance with and
organic olive growers

STELLA CADENTE OLIVE OIL COMPANY**P. O. BOX 160
BOONVILLE, CA. 95415****TEL: 707-895-2848****EMAIL: stellacadente@pacific.net
www.stellacadente.com**

Mr. Richard Mathews
Acting Program Manager
National Organic Standards Board
USDA-AMS-TM-NOP
Fax #: 202/205-7808

Dear Mr. Mathews;

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Thank you very much for your attention to this matter of great urgency for California's organic olive industries.

Sincerely,



Sue Ellery

President

Stella Cadente Olive Oil Company

Robert B. Anderson
RR 1, Box 329
Centre Hall, PA 16828
814-466-7032
bobanderson1217@yahoo.com

DATE: APRIL 18, 2002

TIME: 0700

PAGES (including Cover) 2

TO: RICHARD MATTHEWS
PROGRAM MANAGER
NATIONAL ORGANIC PROGRAM.

RICK,

IT WAS GREAT TO SEE YOU
LAST WEEK

I've ATTACHED A LETTER REGARDING
BIOLOGICAL ADDITIVES. - PLEASE FORWARD COPIES
TO THE PROCESSING COMMITTEE PRIOR TO THEIR
MEETING THIS WEEK.

THANKS & SEE YOU IN AUGUST

RB



**Advisors
in
Food & Agriculture**

David Carter, Chairman
National Organic Standards Board
United States Department of Agriculture
Washington DC

Dear Chairman Clark,

The consideration of the allowance of DEAE, with a sunset clause, as a water treatment in boilers is critical for the processing vegetables, fruits, poultry as well as meals, and very important to US organic companies and organic consumers worldwide.

Water throughout the U.S. varies widely in hardness and dissolved salts such as carbonates. Economic operation of steam plants requires that some method of corrosion prevention be used. Most plants cannot jeopardize the entire complex by shutting off steam additives for 24 hours in advance of running small organic production (frequently on only one of many production lines). Alternatives such as installation of de-alkalizer/de-aerator systems, use of stainless steel piping to reduce corrosion, and other changes required easily run into hundreds of thousands of dollars.

Most importantly, it is virtually impossible for a small, totally organic processor to operate efficiently and economically with out this boiler additive. And US organic companies may not be able to process organic foods.

Currently, a common practice of shutting off the amines when processing organic products creates another potential problem because of metal leaching (especially copper and nickel) from the pipes being cannibalized by the oxygen and salts in the water. Additionally, as organic runs become longer processors will be challenged because shutting off the amines will cause severe damage to their equipment from corrosion.

I suggest that the NOSB compare the processing plants need for some allowances in the use of these types of materials with the farmer's need to use inerts in production materials, or the need to use tractors that emit hydrocarbons or leak fuel or lubricating oils into the field and crops. These chemicals are only there in trace amounts, but if they were banned, farmers would have to abandon modern machinery in organic agriculture. Similarly, banning viable methods of preventing steam corrosion will reduce the number of producers who can process and package organic foods increase the cost of processing and, overall, decrease the number of organic products available to the consumer.

As we have seen time and time again, as the NOSB has allowed materials with a predetermined phase out, the organic industry has worked diligently to provide acceptable alternatives.

Please consider recommending the use of DEAE, with a 5-year phase out, as water treatment in organic processing facilities.

Respectfully submitted,

Robert B. Anderson
SUSTAINABLE STRATEGIES
Advisors in Food and Agriculture

DAYBREAK FARMS, INC.
P. O. Box 416, Traver, CA 93673
(559) 790-5151 cell, (559) 897-0340 fax

April 17, 2002

Acting Program Manager
USDA-AMS-TM-NOP
Room 2510-South Building
1400 and Independence Avenue, SW
Washington, DC 20250-0020
Tel. (202) 720-3252
Fax (202) 205-7808

Re: Spinosad petition

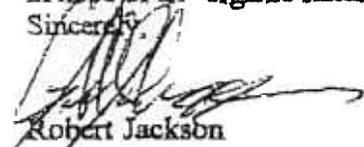
Dear Manager,

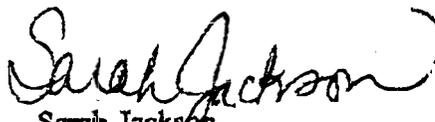
My wife and I along with our five children grow tree fruit on 440 acres in central California. Since 1987 I have been constantly looking for ways to reduce the use of harsh synthetic pesticides. My goal is to farm with an organic certification. I have enjoyed working within the created order by promoting and protecting natural predators on our farm and using safe and/or natural ways of reducing insect pests. As I have been using softer methods to combat insect pests over the past 15 years I have often run into substantial problems with secondary pests that have not been a problem in the past. One of these pests is the Katydid grasshopper. Another pest that I have not been able to control with organic methods is the Western Flower thrip.

Spinosad in the EPA registered formulation of Success has been an invaluable tool that has helped me in my quest to farm using only natural and safe methods. Success has replaced the use of Lanate in my nectarines to control thrip. I have also used Success in rotation with my *Bacillus thuringiensis* sprays to control Peach Twig Bore. Success has also proven to be efficacious in its control of Katydid grasshoppers in their early instars.

Saccharopolyspora spinosa bacterium is a naturally occurring organism and Spinosad is a naturally derived product produced through its fermentation. Spinosad has become an important tool in my IPM program. In my quest to farm organically, Spinosad is needed as an organically certified product. If Spinosad is granted an organic status, farmers wanting to grow organically will have another effective bioinsecticide to use to remain competitive and economically viable. The bottom line is that more food products will be produced organically if Spinosad is granted an organic status.

In hope of an "organic status"
Sincerely,


Robert Jackson


Sarah Jackson

Mr. Richard Mathews
Acting Program Manager
National Organic Standards Board
USDA-AMS-TM-NOP
Fax #: 202/205-7808

Dear Mr. Mathews;

I am writing to express support for organic certification of "Spinosad" for control of the olive fruit fly. This pest has the potential to devastate both the table olive and olive oil industries in California. "Acceptable" levels of olive fly damage for the table olive industry are 2% or less; for the oil industry, 5-10% is the maximum degree of damage that will permit production of a virgin olive oil. Last year, olive fly damage in parts of California exceeded 100%. Under these conditions, organic table olive production is impossible, and organic olive oil production will be severely curtailed.

There is particular urgency at this time as, in order for Spinosad to be effective against the olive fly, it must be applied to the trees at the time of pit hardening, which typically occurs in June (this year's growing season is particularly advanced, therefore pit hardening will likely commence even earlier). Without approval before this time, much of the organic olive production in California may be jeopardized.

There is currently no allowed means of controlling this fly organically. Spinosad, derived from a natural soil actinomycete, has been shown to be highly effective against the olive fly. I believe Spinosad is an excellent candidate for certification by the National Organic Program. I urge you to act promptly to approve an appropriate formulation of Spinosad and to enable California's organic olive growers to utilize this material for the 2002 season.

Thank you very much for your attention to this matter of great urgency for California's organic olive industries.

Sincerely,



Janet Gentile Herrero
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