

ALAMO ORCHARD
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October 4, 2002

Mr. Owusus Bandele
Crops Committee Chairman
National Organic Standards Board
USDA – NOP

Dear Mr. Bandele:

I have been growing apples and peaches organically in Washington State since the early years of our venerable state certification program about 1987. I am writing with great alarm and concern upon hearing the news that mating disruption will not be allowed in organic production because of the class IV inerts used in stabilizing the pheromone in the dispenser. Before we had mating disruption as a tool for controlling codling moth and oriental fruit moth, these pests had the potential of completely devastating a crop in spite of whatever biopesticides or cultural practices were employed. To return to those control measures would mean higher chemical and fuel costs, more soil compaction, and high concentrations of summer oil and chemical residue associated with multiple sprays. The use of mating disruption has allowed the farmer to focus, and invest time and money into soil building instead of running his tractor and sprayer up and down the rows 16-20 times per season.

I implore you to favorably consider the petition submitted by Pacific Biocontrol Corporation to allow the use of the three inert stabilizers used in their dispenser. It will be a win for farmers to be able to control these difficult pests effectively. It will be a win for consumers to get a product without high concentrations of allowed, but undesirable residues. It will be a win for the environment to reduce fuel consumption and soil compaction. This is a product that is allowed in virtually all organic programs worldwide and I can see no benefit and many costs associated with disallowing it here. Thanks for your consideration.

Orlin Knutson

