



Bojorques Co., Inc.

Fruits & Vegetables • EXCALIBUR Advanced Cutting System

May 11, 2001

Keith Jones
Program Manager
USDA-AMS-TM-NOP
Room 2945-South Building
P. O. Box 96456
Washington, DA 20090-6456

Dear Mr. Jones,

As Handlers of fruit for organic growers and processors, we have deep concerns regarding the prohibition of the use of potassium hydroxide as a processing aide in peeling peaches for the IQF processing. By not allowing its use, our growers are being restricted in the sale of their fruit.

The only method currently acceptable by the Organic Industry to peel peaches is *by hand* and in today's economy, this definitely is not cost effective. One of the largest fruit processors in the United States, *J.R. Wood, Inc.* of Atwater, California, has spent several years testing the use of potassium hydroxide as an alternative. They have perfected the technique to the point that detectable levels are almost indiscernible and are, in fact, even lower than what is found in the organic raw fruit. (Test results are available for review.)

Presently, there are only two selling options available to the grower. First, the fresh market. Organic consumers demand the same quality that is submitted for conventional. In order to meet the criteria set by USDA for Grade A #1 quality fruit, heavy sorting of cosmetic defects must be performed at the packing facility on the organic fruit; much more than is necessary to conventionally grown peaches because we are not using chemicals as a pest/defect control. This concentrated sorting, naturally, creates more sort-outs. The sort-outs are sent to processors for puree or juicing, the only other selling opportunities currently available. These markets are very limited and prices are negligible.

It is extremely important to have another outlet for the fruit. We have received many inquiries from customers wishing to purchase IQF sliced or diced peaches to add to products such as ice cream, yogurt or for bakery goods. The acceptance by the Organic Industry for the use of this processing aide will allow for the pursuit of this business. Without these new selling opportunities in the future, it is uncertain if the farmers will be able to continue justifying costs incurred for a commodity not showing a profit.

Overall, the progress made the last few years within the Organic Industry has been steady and positive. And now, with USDA involvement, hopefully the public's perception and trust will continue to increase.

We at Bojorques Company, and our growers, are committed in our efforts to provide the best quality organic products. We only ask that some consideration be made toward the economics involved to ensure the availability of all products to future consumers.

Sincerely,

Jack Bojorques