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Arthur Neal, Director
Program Administration
National Organic Program
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RE: Docket # TM-0407

To Director Neal,

Columbia Gorge Organic Fruit is a medium sized organic farm in the Hood River Valley, Oregon. In 1989 it became an organic farm and started the first organic packing house in the valley and we are currently the only all organic fresh juice company with a full line of 100% organic drinks is the US.

In our organic packing and juice plant, we use the following synthetic substances list under 205.605 to help produce top quality organic products.

1. **Hydrogen Peroxide**
    - Used in water to hydro-cool cherries to prevent brown rot and mold when fresh packing the fruit.
    - Used in the water for the floating of apples and pears for fresh packing which helps cut down on decay and mold.
    - Used as a cleaner in the wash water of carrots for the purpose of juicing.

2. **Ozone**
    - Used to clean fruits and vegetables for our organic juices. For general information, we use an ozone generator that turns plain water to ozone. We are not sure if this is the same ozone that is listed on the synthetics allowed list.

3. **Ascorbic Acid**
    - Since there are no natural vitamin C sources available, we are left with using ascorbic acid for our purees, which significantly cuts down on the oxidation of purees. We have experimented with using lemon juice and other organic

substances, but they do not work as well as ascorbic acid. We produce our own pear puree with pears grown on our farm and other farms in the Pacific Northwest. Ascorbic Acid is used for anti-browning of purees, meaning without ascorbic acid the pear puree will turn brown. Once processing our pear puree, we add the ascorbic acid and no browning will occur once added, then we freeze off the puree in pails in an unpasteurized state, which keeps the puree fresher and keeps more of the nutrition value of the fruit. When we the manufacture our juices with the frozen puree, then we pasteurize the final products.

35% of our juices contain our organic pear puree; it's the bases of our juice formula for our juice smoothies. If we are unable to use our organic pear puree then this ruling will force us to use more banana puree from outside of this country. We are currently changing our Organic Banana puree to Aseptic Non-Acidified Banana puree, but this puree is fully stabilize through heat treatment and is not as fresh & nutritionally active as the pear puree we manufacture. This will change our ideals and ways in our commitment to growing and buying USA products and manufacturing the most nutritional and fresh tasting juices.

Under the new ruling we would like to still use ascorbic acid and label our organic fruit juices under the 95% rule. For our company, we are greatly reliant on the usage of pears since we are the primary grower and fruit packer of these pears. It wouldn't seem right to not be able to use our own pear puree in our juices.

We are committed to having all organic products that fall in between the 95% & 100% organic labeling rule. We are not interested in labeling "made with organic ingredients," since everything in our juices is 100% organic except for the usage of ascorbic acid as a processing aid.

Yours truly,

The Stewart Family
Stewart Brothers, Inc.
Stewart Farms, Inc dba Columbia Gorge Organic