



October 18, 2002

Richard Matthews, Program Manager  
National Organic Program  
USDA Agricultural Marketing Service  
Room 2510 South Building  
1400 Independence Avenue SW  
Washington, DC 20250

Dear Mr. Matthews:

The U.S. Apple Association (USApple) is the national trade association representing all segments of the apple industry. Members include 40 state and regional apple associations representing the 8,000 apple growers throughout the country, as well as more than 400 individual firms involved in the apple business. USApple is writing to express our grave concern that the National Organic Standards Board's policy on inert ingredients will destroy organic apple production in the United States.

It is our understanding that the presence of certain inert ingredients in currently available pheromone dispensers may disqualify their use in certified organic orchards under the new National Organic Standards. This would result in the loss of mating disruption as an effective pest control tool for codling moth, causing serious harm to organic fruit producers in the United States, since no comparable and approved alternatives are currently available.

Nearly all organic apple production in the United States relies on a pest management strategy known as mating disruption. Conventional apple growers and organic apple growers routinely control codling moth by interfering with its mating cycle. This is accomplished by dispersing plastic pheromone dispensers in trees, which dispense a steady invisible pheromone stream throughout the orchard. These pheromone streams confuse male codling moths, and prevent them from fertilizing female moths. The inert materials in these pheromone dispensers are enclosed in the dispenser, and do not come in contact with the fruit, the tree or the environment.

The inability to use codling moth mating disruption or the use of less effective pheromone dispensers without these inert ingredients would result in major crop losses to organic pome fruit growers, collateral damage to neighboring orchards and eventual withdrawal from certification for many producers. We therefore urge the National Organic Standards Board to adopt a new policy that exempts the pheromone formulations currently used in mating disruption from the prohibition on synthetic inert ingredients,

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and to affirmatively state that mating disruption dispenser systems are an approved method of pest control in organic orchards.

Please contact me by telephone at (703) 442-8850 or via e-mail at [jcranney@usapple.org](mailto:jcranney@usapple.org) should you have any questions or require additional information.

Sincerely yours,

A handwritten signature in black ink, appearing to read "JR Cranney, Jr.", written in a cursive style.

James R. Cranney, Jr.  
Vice President

cc: U.S. Apple Board of Trustees