

RENO N.A.



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March 14, 2000

Florida Certified Organic Growers
Attention, Marty Mesh
RE: Ethylene, Crops.

Dear Marty,

Please forward this comment to the NOSB, to be added to the 1999 Technical advisory Panel review, for review of use in crop production, and be part of the Record Made.

Project / Field name - RENO N.A./ S.A.

Project Description - 64 Acres (1,000,000) plants Certified Organic Pineapple.

Certification Status- As of April 15,2000 Certified Organic by BCS-Oko Ganantie Of Germany

Application pending with Florida Organic Growers (F.O.G.)

Field Manager and Consultant- Reynaldo Nolasco - Santo Domingo, Dominican Republic.

Owner and operator RENO N.A. Joseph S. Natoli - Brooklyn, New York USA.

ETHYLENE USE
IN

PINEAPPLE PRODUCTION

I, Joseph S. Natoli and family, have been producing pineapple since 1987.

Our production level was always very small (50 to 500 cases). We only shipped fruit that flowered and ripened with the use of rotten fruit and or smoke. Although we never made much profit it was always rewarding to produce quality fruit.

In 1997 we were fortunate to come upon and lease a 64 acre field of virgin soil suitable for pineapple production. BCS OKO Garantie of Germany, an International certification organization confirmed our opinion that the soil was suitable for pineapple, and is currently our certifier. In addition we are application pending with F.O.G.

We have been following the materials review regarding the use of growth regulators that contain ethylene for use in pineapple production and can tell you first hand that in order to fully reap the fruit of our labor, even in a small field as ours (1,000,000 plants) it is absolutely necessary.

Pineapple production is one of the leading natural resources in the Dominican republic. Of a population of about 7,000,000 people, pineapple is a staple in almost every dinner plate. Pineapple production technic is handed down from generation to generation and through the century, every conceivable technec has been used to promote uniform flowering and ripeness in commercial pineapple production, but none have have been successful on a commercial scale. The fact of the matter is that without the use of a ethylene containing material uniform flowering and ripeness simply will not happen.

To do without a material that provides a natural ripening and flowering sequence as does ethylene, would be a waste of the wonderful quality fruit available to the organic community. And although we believe that some time soon a method to harness natural occurring ethylene from fruit shall be common place, to phrohibit the use of present day

ethylene availability in pineapple production, because of the current method that is used to produce ethylene would be devastating to even a small grower like us.

In addition we would like to point that the concept of using a un-natural growth regulator is not foreign in organic production i.e.. seaweed.

Also the new ruling of the use of ethylene in post harvest organic production of tropical fruits, mainly bananas, has provided a solution to ripening, that without would have made commercial banana production impossible.

Just as it is common knowledge that ethylene is needed to ripen post harvest bananas, so is it common knowledge that ethylene is needed in uniform pineapple flowering and ripening.

All we are asking is to be allowed to use the same material that is being used in tropical fruit ripening, to be used in per-harvest pineapple production, because without it the fruits of our labor will be doomed to unpredictable picking schedules and green poor quality fruit.

Sincerely,

Joseph S. Natoli