Brother Bru-Bru's

September 1, 2017

Lisa M. Brines, Ph.D. National List Manager National Organic Program 1400 Independence Ave, SW Room 2646-S STOP 0268 Washington, DC 20250-0268

Dear Ms Brines:

Thank you for your attention to our petition requesting the addition of Japones Chile Peppers to section 205.606 of the National Organic Program's (NOP) National List of Allowed and Prohibited Substances (National List).

In response to your questions:

- 1) We have contacted growers about contract growing organic Japones chile peppers, and we are not able to get them in the quantities we would require.
- 2) Brother Bru Bru's has been producing its African hot pepper sauce for 25 years. We have loyal fans and do not want to change the taste, including the heat level. The peppers you suggested as possible alternatives would not be acceptable as there are marked differences in how hot the various peppers are. Japones Chile Peppers have a Scoville Heat Unit (SHU) of 15,000-30,000. The substitution of Thai Chile Peppers with a SHU of 90,000 would increase the heat level; substitution of Guajillo Chile Peppers with a SHU of 2,500-5,000 would reduce the heat level.

The other component of the taste is the flavor. While the De Arbol Chile Peppers have a similar SHU, their flavor is significantly different with a nutty taste as opposed to the relatively clean taste of the Japones Chile Peppers. We are striving for consistency of the flavor profile.

Thank you for your consideration.

Best wishes,

Cynthia Riddle

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