

**Petition to the National Organic Program and
National Organic Standards Board
For Japonese Peppers to be added
To National List Section 205.606**

Item A

We ask that you amend the National List, Section 205.606, to include non-organic Japonese Peppers, and allow its substitution when an organic alternative is unavailable.

Item B

1. **Common Name:** Japonese Chile Pepper
Botanical/Latin Name: Capsicum Frutescens
Other Names: Santaka
Hontaka

2. **Manufacturers' Name, Address and Telephone**

We are unable to find a supplier of certified organic Japonese Pepper. However, our current non-organic manufacturer that we use for our Japonese Peppers is Red Hot Chilis. Their address is 925 Hooper Street, Los Angeles, California 90021. Their telephone number is (213)624-0100.

3. **Intended Use**

Japonese Pepper is only used in our Brother Bru Bru's Original African Hot Sauce. The ingredient is used because it contains a medium amount of capsicum; the chemical that gives chili peppers their sensation of heat. This pepper has a subtle flavor that does not detract from the flavor of the Habanero; it is mainly for the purpose of simple heat.

4. **A list of crop, livestock or handling activities for which the substance will be used. If used for handling (including processing), the substance's mode of action must be described.**

The sole use of this Japonese Pepper is as an ingredient in Brother Bru Bru's Original African Hot Sauce.

The production method is as follows: We first source our raw materials (spices and peppers) and ship all our ingredients, including labels and bottles, to CMS in Healdsburg, California. They mix all the peppers and spices in apple cider vinegar and heat it to 180 degrees Fahrenheit. Then the finished product is pumped to a 5-ounce glass bottle, which later is given a label, cap, and protective sleeve with a date stamp on it. These bottles are packed in a six-bottle box container.

5. The source of the substance and a detailed description of its manufacturing or processing procedures from the basic component(s) to the final product.

Japones Peppers are native to China and are commonly used in Caribbean and Latin American cuisines. This chili is popular among the southern Asia countries because of its pure simple heat that does not have a complex flavor profile. The manufacturing process of Japones Peppers generally includes growing, harvesting, sorting, drying and grinding.

6. Ancillary Substances

Not applicable.

7. A summary of any available previous reviews by State or private certification programs or other organizations of the petitioned substance.

None were found.

8. Information regarding EPA, FDA, and State regulatory authority registrations, including registration numbers.

None were found

9. The Chemical Abstract Service (CAS) number or other product numbers of the substance and labels of products that contains the petitioned substance.

There is no Chemical Abstract Service number, nor are there other product numbers for the substance. We do not have labels of the products; however, we do have an invoice from our Japones Pepper supplier, which is located in Attachment 2.

10. The substance's physical properties and chemical mode of action.

See Attachment 1 for more detailed information.

The substance that give chili peppers it's heat is capsaicin, 8-methyl-N-vanillyl-6-nonenamide, $(\text{CH}_3)_2\text{CHCH}=\text{CH}(\text{CH}_2)_4\text{CONHCH}_2\text{C}_6\text{H}_3-4-(\text{OH})-3-(\text{OCH}_3)$. This is the active component of chili peppers, which belongs to the genus Capsicum. It produces burning sensation if it comes into contact to human or mammal tissue. Capsaicin and several others related chemicals, collectively called capsaicinoids, are the substances that account for the heat. Pure capsaicin is a hydrophobic, colorless, odorless, and crystalline to waxy compound. The "heat" of chili peppers is measured in Scoville units. Bell peppers rank at zero Scoville units, jalapenos at 3,000-6,000 Scoville units, japones pepper at 15,000-35,000 and habaneros at 300,000-500,000 Scoville units.

11. Safety information about the substance including a Material Safety Data Sheet (MSDS) and a substance report from the National Institute of Environmental Health Studies.

No MSDS is available from the supplier

12. Research information about the substance, which includes comprehensive substance research reviews and research bibliographies, including reviews and

bibliographies, which present contrasting positions to those presented by the petitioner in supporting the substance's inclusion on or removal from the National List.

Unfortunately, this information does not exist, and, to repeat, we have been unable to find a supplier of certified organic Japonese Pepper.

13. Petition Justification Statement

There is no research as to why organic Japonese Peppers are not produced in large quantities. At the moment, the only organic Japonese Peppers we could find were sold through Amazon from Country Creek Acres for 1 pound increments for \$21.49 per pound (<https://www.amazon.com/JAPONES-PEPPER-WHOLE-DRIED-LB/dp/B0118DJKRQ>). Using this supplier would be insufficient due to the large quantity of Japonese Peppers required for our product. Therefore, we request that "Japonese Peppers" be added to the National List of non-organically produced agricultural products that can be allowed in products labeled as "organic." Naturally, Brother Bru Bru's will use an organic alternative as soon as it is available.

ATTACHMENT 1

DETAILED INFORMATION ON JAPONES PEPPERS

Pepper Profile: *Capsicum Frutescens*



Description

Pepper varieties in *Capsicum frutescens* can be annual or short-lived perennial plants. Flowers are white with a greenish white or greenish yellow corolla, and are either insect or self-fertilized. The plant's berries typically grow erect; ellipsoid-conical to lanceoid shaped. They are usually very small and pungent, growing 10-20mm long and 3-7mm in diameter. Fruit typically grows a pale yellow and matures to a bright red, but can also be other colors. *C. frutescens* has a smaller variety of subspecies, likely because of the lack of human breeding compared to other capsicum species. More recently, however, *C. frutescens* has been bred to produce ornamental strains, because of its large quantities of erect peppers growing in colorful ripening patterns.

Information source:

http://en.wikipedia.org/wiki/Capsicum_frutescens

Pepper Info

The Japones Chile (*Capsicum frutescens*) is a small, pointed chile, 2-3 inches long and 1/2 inch wide. This chile is similar in appearance to the De Arbol. Though the walls of the Japones are thicker. Dried Japones Chiles are medium hot and good with Asian dishes. On the heat scale, this chile is 5-6 out of 10, or in Scoville heat units 15,000 to 35,000. Japones Chiles are medium hot and frequently found in spicier Asian and Oriental dishes.

Information source:

<https://www.woodlandfoods.com/chef-guides/de-stemmed-japones-chiles/p-21710>

ATTACHMENT 2 INVOICE FROM RED HOT CHILIS

RED HOT CHILIS

RED HOT CHILIS
925 HOOPER ST. (213)624-0100 FAX (213)623-7664
LOS ANGELES, CA. 90021

INVOICE # 11750
DATE: Jan/06/2015

Customer:
BROTHER BRU BRU'S
501 ESPLANADA # 238
90277 CA
310-808-4922

P. O. # 1028

Salesperson: (140)
Due Date Jan/27/2015

Packs	Qty/Unit	Code	Item	Unit Price	Total
3	75.0lb	BOJACH	CHILE JAPONES MOLIDO-KIT 1 LOT#25637	1.70	127.50

ONE HUNDRED TWENTY SEVEN dollars 50/100 USD.

IMPORTANT NOTICE !!! when sending payments by MAIL !!!
please send to: P. O. BOX 86967
LOS ANGELES, CA 90086

All merchandise on this invoice is sold as is and is purchased on buyer's own inspection. There is no warranty expressed or implied as to description, quality or condition of merchandise. Unless we are notified of any discrepancies within twenty-four (24) hours of receipt of invoice, this invoice must be paid in full.
Past due accounts, subject to interest charges of 1.5% per month. Buyer agrees to pay collection cost, attorney fees and actual court cost if such be incurred in the collection of this amount.

Sub-Total:	127.50
Discount:	0.00
Sub-Total:	127.50
TAX:	0.00
TOTAL: \$	127.50