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May 6, 2011

PETITION for Kaffir Lime Leaves and Fruit (kiewer lime, Makrut lime, Citrus Hystrix) to be added to §205.606

Item A

Non-Organic agricultural substance allowed in or on processed products labeled as "organic", §205.606

Item B

1. Leaves and Fruit of the Kaffir Lime Tree, Citrus Hystrix
2. A) Organic growers:

Beck Grove La Vigne Organics, PO Box 2890 Fallbrook, CA 92088, tel. 760-723-9997

On the page <http://apps.ams.usda.gov/nop> the entries Kaffir and Citrus Hystrix produce these TWO farms, which I have contacted:

Amma's Farm, PO Box 223639, Princeville HI 96722, tel. 808-826-9250 (spoke to them, they only have 1 Kaffir lime tree in their garden)

USDA Agricultural Marketing Service

United States Department of Agriculture
Agricultural Marketing Service

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AMS is responsible for providing oversight to accrediting certifying agents and their certification of organic production and handling operations. On an annual basis, AMS receives information about these operations from each of the accredited certifying agents. The form below will allow you to search for certified operations based on specific criteria. You can use one or all of the fields to conduct your search by entering or selecting the required information in the table header.

Ref#	Certifying Agent	Operations	Certificate No.	Primary Scope	Secondary Scope	State	Country	Products Produced
56876	HOFA	Amma's Farm	1313.439864	Crops		HI	United States of America (USA)	Fruit, Flowers & Hardwoods: Abiu, Ackee, Allspice, Amla (Indian gooseberry), Avocado, Bamboo, Banana, Baobab, Bilimbi (Cucumber tree), Brachychiton (Bottle tree), Breadfruit, Breadnut, Brugmansia (Angel's Trumpet), Carob, Cashew, Cherry (Brazilian, Surinam), Chico (Sapodilla), Tahitian, Cotton tree, Eggfruit, Euclea divinatorum (Magic gwarra), Fig, Gourd tree, Guava (white), Inga, Jackfruit, Jujube, Kaffir Lime, Kamani, Kapok, Ko (sugarcane), Kukui (Candle tree), Lime, Mock orange, Nance (Savanna Serrette), Neem, Noni, Oroxyllum (Tree of Damocles), Papaya, Parkia (Petal), Peanut butter tree, Pheasantwood, Pili nut, Pongam (Poonga Oil tree), Quebracho (Axe-breaker tree), Rambutan, Red mombin
56744	HOFA	Amma's Farm	429	Crops		HI	United States of America (USA)	Fruit, Flowers & Hardwoods: Abiu, Ackee, Allspice, Amla (Indian gooseberry), Avocado, Bamboo, Banana, Baobab, Bilimbi (Cucumber tree), Brachychiton (Bottle tree), Breadfruit, Breadnut, Brugmansia (Angel's Trumpet), Carob, Cashew, Cherry (Brazilian, Surinam), Chico (Sapodilla), Tahitian, Cotton tree, Eggfruit, Euclea divinatorum (Magic gwarra), Fig, Gourd tree, Guava (white), Inga, Jackfruit, Jujube, Kaffir Lime, Kamani, Kapok, Ko (sugarcane), Kukui (Candle tree), Lime, Mock orange, Nance (Savanna Serrette), Neem, Noni, Oroxyllum (Tree of Damocles), Papaya, Parkia (Petal), Peanut butter tree, Pheasantwood, Pili nut, Pongam (Poonga Oil tree), Quebracho (Axe-breaker tree), Rambutan, Red mombin

Siam Agricultural Bio Products, Naahan, Muang Loei, Loei, 42000, Thailand, thanyathorn thanyaprakon [tanya_sabp@yahoo.com]

Is an option, but there is the problem with importing agricultural product from Thailand due to the asian citrus psyllid, see below.

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NOP Certified Operations									
Ref#	Certifying Agent	Operations	Certificate No.	Primary Scope	Secondary Scope	State	Country	Products Produced	
+	41318	BCS-Okogaranth GmbH	Siam Agricultural Bio Products (SABP)	A-2007-00050 / 2010-03758	Crop	Handling		TH Thailand	citrus hystrix Rice, Hom Mali brown, Shallot, fresh, Coriander/Cilantro, leaves, Garlic, fresh, Kidney Beans, Basil (Ocimum sp), Rice, Soybeans, Black "nin" rice, Bananas (Musa paradisiaca), Lemongrass (Cymbopogon citratus), Citrus hystrix, leaves, Rice, Hom Mali white, Chilli, fresh, Pineapples (Ananas comosus), Galanga root (Alpinia officinarum)

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Disclaimer: Information contained in this database reflects operations that were certified to the National Organic Program regulations, during the 2010 certification year. Some of the data related to the operations listed could be out of date. For more up-to-date information concerning certified organic operations that are listed in this database, the certifying agent associated with the operation may be contacted.

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B) nonOrganic growers:

Michael Hamer, 14909 Four Corners Trail Ramona, CA 92065, tel. 619-890-2066

Thye Chuan Tropical Products, Daniel Loo, 36 Block-B MK-12 Sungai Nibong Kecil 11900 Penang, Malaysia, tel. +60 464 51 162

CK Interbiz Co Ltd. 37/39 Ratchadaphisek 14 Rd. (Ratchada-Thapra) Talad Plu, Thonburi, Bangkok 10600 Thailand, tel. +66 2 8915044

Union frost company Ltd., Mr. Phas Likitwatcharapakorn, 60 (6th Fl) Soi Bangna-Trad 25, Bangna, Bangkok 10260, Thailand, tel. +66 2 3618950

3. Substance will be used as an ingredient for curry sauce, flavoring agent
4. Kaffir lime leaves are used to enhance the authentic flavor of Thai curries, they are impossible to substitute
5. Kaffir lime leaves grow on small trees. The leaves are harvested, washed with water and cut into small pieces with a blender.
6. Not available
7. Not available
8. Not available
9. Chemical interactions
 - a. N/A
 - b. N/A
 - c. N/A
 - d. N/A

- e. N/A
10. Not available
11. Kaffir lime (citrus hystrix) has been used extensively in traditional Thai medicine. Fruit peel of kaffir lime helps relieve stomach pain. In a study Kaffir lime at a concentration of 5 and 10g/100 ml inhibited fungal spore germination of Colletotrichum gloeosporioides. The inhibitory effect on fungal growth of kaffir lime leaf might be due to citronellal. (Dept. of applied biology and Dept. of applied statistics, Faculty of science, King Mongkut's institute of technology Ladkrabang, Bangkok, Thailand)

IMPORTANT: Kaffir lime trees are under quarantine

What is the Asian Citrus Psyllid?

The Asian Citrus Psyllid is an **aphid-like insect** that feeds on the leaves and stems of citrus trees and other citrus-like plants – but the real danger lies in that it can be a carrier of a deadly, bacterial tree disease called **Huanglongbing (HLB)**, also known as **Citrus Greening Disease**.

Where has the insect been found?

The disease-carrying Asian Citrus Psyllid has already caused devastation in Asia, India, parts of the Middle East, and South and Central America. Now the psyllid has been found in Mexico, Hawaii, Texas, Louisiana, Georgia, Alabama, South Carolina, Florida and – most recently – southern California.

In June 2008, the psyllid was spotted dangerously close to California – right across the international border in Tijuana, Mexico. Only a few months later, it was detected in San Diego and Imperial counties. The Asian Citrus Psyllid has also been intercepted coming into California in packages of fruit and plants, including citrus, ornamentals, herbs and bouquets of cut flowers, shipped from other states and countries.



Yellow sticky cards can be hung in or around citrus trees to capture flying adult psyllids. This is an important way to monitor for the presence of the insect.

What is being done to stop the insect?

The California Department of Food and Agriculture has issued a state interior quarantine in areas where the psyllid has been found, and is applying treatments to control the infestation. County agricultural commissioners, CDFA and USDA, along with industry groups such as the Citrus Research Board, are working together on increased surveying and trapping. Additionally, the California Citrus Research Board is setting up new diagnostic laboratories at several locations in the state to enable mass testing of psyllids and plant material for the disease.

Inspection of cargo at international ports, state lines, airports and mail-sorting facilities has been ramped up to intercept the insect. But don't forget that consumers play a critical role in helping protect our state from the psyllid and HLB. Live plants or plant parts should never be transported from other states, and people should **inspect their citrus trees often**.



Floral bouquets containing psyllid-infested orange jasmine have been intercepted coming into California from Mexico.

How could the Asian Citrus Psyllid further spread in our state?

The Asian Citrus Psyllid could spread throughout the state by the transportation of infested plants or plant parts. To curb this, a **quarantine has been implemented**.

The disease-carrying Asian Citrus Psyllid could spread throughout the state on citrus plants and close relatives of citrus – such as orange jasmine or Indian curry

leaves – that arrive in airplanes, ships, trucks, cars or mail. Distribution of orange jasmine plants by retail nurseries was the main method of movement of the Asian Citrus Psyllid throughout Florida. Floral bouquets containing psyllid-infested orange jasmine have been intercepted coming into California from Mexico.

Additionally, the psyllid could fly northward from southern California and gradually spread throughout the state

>>>> there is a way we can use the kaffir lime leaves: the California Department of Food & Agriculture inspector comes to the Beck Grove facility in Fallbrook CA, inspects the washed and frozen leaves and signs them off. Then they are sent, packed with dry ice to the production facility in Fresno, CA.

Our goal is to be able to use Organic as well as non-Organic kaffir lime leaves grown here in California where the inspection of the leaves is assured and the quality of the leaves is not disputable.

12. G. Inclusion of a Non-Organically produced agricultural substance onto the National List, §205.606

- The kaffir lime leaf is an important flavoring for Thai curries and cannot be substituted
- I searched online all over the globe and I found several growers in CA, Thailand and Australia. None of them Organic.
- **(1)** Citrus Hystrix grows in warm climates such as Thailand, Central America, South Western USA
- **(2)**
 - i. I have found 1 Organic grower in Southern California, La Vigne Organics. She has 10 trees which produce about 50 pounds annually. My needed quantity is 30 times that amount.
 - ii. I have not been able to find another grower that has an organic certification that is accepted by the USDA (NOP)
 - iii. There is one grower in CA that has an orchard of 2 acres. But the farm isn't certified organic.
 - iv. There is not a big demand for organic or non organic kaffir lime leaves in the US, therefore not much supply.
 - v. Several growers in South East Asia, but their farm sizes are unknown. For addresses see 2.
- **(3)** N/A
- **(4)** N/A
- **(5)** N/A

Thank you, Michael Buechi

CEO / Founder

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