

GIBBERELLIC ACID

EXECUTIVE SUMMARY

REJECT because gibberellic acid is applied post-harvest primarily to act as a **preservative**. Organic standards prohibit the addition of materials to the National List if their primary purpose is to act as a preservative (7 CFR 205.605(b)(4)).

GIBBERELLIC ACID

The Cornucopia Institute urges the Board to reject the Valent Biosciences Corporation petition for adding gibberellic acid to the National List.

According to the TR, “gibberellic acid can be applied post-harvest to control fruit ripening and maintain quality through packaging, long-distance shipping, and shelf-life” (TR 100-101). In other words, gibberellic acid is applied post-harvest primarily to act as a **preservative**.

The Handling Committee proposed an annotation to restrict the use of gibberellic acid to post-harvest use on bananas only. The TR says the following about use on bananas: “Similarly, when used on bananas, gibberellic acid will delay fruit softening and color development, allowing for longer shipment time (i.e., further shipment distances) before bananas are considered “ripe” (TR 103-104). The TR also notes that the petitioner specifies its use on post-harvest bananas would be to “delay ripening.”

Federal organic standards prohibit the use of synthetic materials if their primary use is as a preservative (7 CFR 205.600(b)(4)). Phrases such as “delay fruit ripening” and “allowing for longer shipment time” are ways of describing the purposes of a *preservative*.

When addressing the question of whether the petitioned material’s primary use is as a preservative, the TR states: “Used in this way, gibberellic acid acts as a preservative of raw agricultural commodities post-harvest, and not as a preservative in processed food” (TR 415). It seems to us that the standards do not distinguish between the prohibition of preservatives in processed foods and preservatives of raw agricultural commodities, so it is unclear why the TR answers in this way. **The standards prohibit substances whose primary function is as a preservative from the National List**, and do not distinguish between preservatives for processed foods and raw agricultural commodities.