



ORGANICALLY GROWN COMPANY

Promoting Health Through Organic Agriculture As A Leading Sustainable Organization

May 3, 2012

National Organic Standards Board,
Ms. Ann Michelle Arsenault, Special Assistant,
USDA-AMS-NOP, 1400 Independence Ave. SW.,
Room 2648-S, Mail Stop 0268,
Washington, DC 20250-0268

Docket No: AMS-NOP-12-0017; NOP-12-06

National Organic Standards Board:

Organically Grown Company (OGC) was founded over 30 years ago and is now the largest distributor of organic fruits and vegetables in the Pacific Northwest. Our business is owned by regional farmers and employees and has annual sales of over \$100 million. Currently, OGC works with more than 500 grower/vendors and serves over 250 natural and fine food stores and restaurants located throughout western Oregon and Washington, as well as retail and wholesale accounts in other western states and Canada.

HANDLING COMMITTEE: GIBBERLLIC ACID

We urge the NOSB not to approve the use of gibberillic acid for post-harvest use on bananas, citrus or pineapple.

In 2011 OGC distributed 6 million pounds of bananas primarily grown in Mexico, supplemented by fruit grown in Ecuador and Peru. OGC handled about 725,000 lbs of pineapples bought from Mexico, Costa Rica and Hawaii. With regard to citrus fruits, OGC sourced about 8.5 million pounds produced in California, Arizona, Texas, Florida and Mexico.

OGC contacted the producers from whom we source these products in order to assess their need and desire to use postharvest applications of gibberellic acid to support transport and storage of their crops. We learned, firsthand, from field managers of the farms from which we source our bananas that, in their opinion, use of on-farm cultural practices (i.e. attention to soil fertility and removal of infected plant material combined) is the best approach for controlling black sigatoka. The experience of these producers is that use of cultural practices reduces the pressure of the disease on both the fruit and the trees, thus providing acceptable control of black sigatoka during shipping. In addition, they believed the careful attention to soil fertility and field sanitation also improves the long-term health and rigor of their production systems. These growers told us that the effect of allowing gibberillic acid for post-harvest application would likely result in less focus on preventative management of soil health and sanitation in the banana plantations. Our growers stated that postharvest application of gibberellic acid can indeed provide an effective approach for controlling black sigatoka during shipment of bananas, but this system is less holistic and not in alignment with the principles of organic production when cultural practices can

be used to achieve a workable outcome. OGC agrees with this perspective and therefore, does not support the addition of gibberellic acid to the National list for postharvest use on bananas.

Furthermore, OGC shares the Handling Committee's concerns about the damage caused by gibberellic acid post-harvest to the nutritive quality of citrus and therefore agree with the Committee that the material is not appropriate for postharvest use on citrus. OGC also agrees that the petition does not make a convincing argument that gibberellic acid is needed for shipment of organic pineapples, and our own experience with handling this fruit confirms that gibberellic acid is not needed for this use.

GMO LETTER & GMO AD-HOC COMMITTEE

Organically Grown Company (OGC) supports the NOSB's intent to communicate directly with the US Department of Agriculture (USDA) Secretary, Vilsack, about the serious public concerns brought before the Board regarding potential for contamination of organic systems by GMOs. Timely action by the USDA to implement policies that protect organic farmers and the organic supply chain are critical to the integrity of the organic seal and consumer confidence.

We fully support the Ad Hoc GMO Committee's letter on March 28, 2012 which asserts that "the USDA's actions to date on genetically engineered crops have been insufficient to protect the organic industry" We also strongly agree with the Committee's judgment that "the responsibility to prevent GMO contamination of organics is shared by those who develop, use, and regulate this technology."

We urge the NOSB to approve the letter and send it to the Secretary at the earliest opportunity.

OGC is pleased to see the establishment of an NOSB Ad Hoc Committee on GMOs to help organic producers and handlers avoid contamination across the supply chain, we also believe strongly that the developers and users of GMO technology must be held *primarily* accountable for preventing contamination of organic. OGC believes that current methods of regulating GMOs result in the organic food industry carrying an unfair burden to prevent contamination, which in turn, places organic producers and all businesses that purchase, handle, process and sell organic products under constant threat of market and livelihood losses.

Thank you for your consideration of our comments.

Natalie Reitman-White
Director of Sustainability and Trade Advocacy
Organically Grown Company