



October 8, 2025

Ms. Michelle Arsenault  
Advisory Board Specialist  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Ave. SW  
Room 2642-S Mail Stop 0268  
Washington, DC 20250-0268

**RE: AMS-NOP-25-0034**

Dear Ms. Arsenault:

On behalf of the International Fresh Produce Association (IFPA), we appreciate the opportunity to submit the following comments in response to the Crops; Compliance, Accreditation, and Certification; Materials; and Handling Subcommittees discussion materials listed in the Fall 2025 NOSB Agenda.

IFPA represents over 2500 companies from across the global supply chain for fresh fruits and vegetables, including more than 500 companies with certified organic fresh fruit, vegetables, and flowers. IFPA works with all facets of the fresh produce industry and provides numerous services to its membership including government advocacy, global engagement opportunities, food safety recommendations, the latest in fresh produce technology, supply chains, sustainability, marketing, industry relationships, and leadership. IFPA aims to increase fresh fruit and vegetable consumption, including organic produce, to improve the health and well-being of consumers.

The IFPA Organic Committee is made up of 20 volunteer leaders in the produce industry, who represent a wide array of organic fruits, vegetables, and other specialty crops, as well as many types of operations, in several different growing regions. The committee supports and guides IFPA's priorities in organic production and across the organic supply chain.

The feedback provided on the discussion topics and questions is critical to ensuring our IFPA organic growers can continue to provide organic fresh produce domestically and internationally. We are grateful for the opportunity to weigh in on these topics and for the continued dialogue and consideration provided by NOSB.



## **Crops Subcommittee (CS)**

### **Pear Ester**

The IFPA Organic Committee members reiterate past comments to strongly support the continued use of pear ester in organic production of fruit trees and the management of pests.

Pear esters work by disrupting the mating process of codling moths. Pheromone dispensers and lures containing pear ester provide the only products that help growers to assess and manage both male and female codling moth. The use of pear ester products also gives growers the ability to understand codling moth locations and population density. These methods are especially critical at this time due to a higher codling moth population over the past three to five years.

Without pear ester tools, specifically passive dispensers and lures, organic growers will have fewer and less effective options for determining when and where to spray insecticides, thereby increasing the number of sprays to manage pests. IFPA members urge NOSB to add pear ester to the national list, along with an annotation not allowing the microencapsulated formulations, to ensure the continued use of other forms of pear ester. IFPA members also request that NOSB consider kairomones as a class in the future due to their effectiveness and organic growers' limitations around the use of insecticides.

Although we strongly support the petition to add synthetic pear ester to the National List, we respectfully request that the NOSB send the petition back to the Crops Subcommittee so the annotation can be corrected. We want to clarify for the Board that the pear ester annotation, as written inadvertently, prohibits the passive dispensers and lures that are so critical to codling moth mating disruption. The annotation should only prohibit microencapsulated formulations – not the passive dispensers and lures that do not contain any microencapsulation. The annotation should be clear and simple: “not for use in microencapsulated formulations.” We appreciate the Subcommittee's thoroughness and understanding of the importance of passive dispensers and lures to codling moth mating disruption in organic orchards.

### **Synthetic Compostable Polymers**

#### **Synthetic Compostable Polymers**

The Organic Committee is supportive of reducing municipal food waste and expanding access to compost for mulching, landscaping, and related uses. It is also supportive of looking for developing new compost tools, but finds it is imperative that additional research be conducted before any consideration of synthetics and plastic usage in organic compost. The Organic Committee recommends that a solution be found in the State of California, given that the definition of compost was imposed by the State of California and therefore should be self-contained within the State.

After careful consideration, the Members of the IFPA Organic Committee have found that granting a broad allowance for ASTM-certified compostable synthetics as compost feedstocks is inconsistent with



the requirements and intent of organic standards. The members of the Organic Committee are committed to the decision-making process of the National Organic Standards Board and, therefore, recommend that any consideration of any petition regarding synthetic compostable polymers go through the standard process and not be given special treatment by the National Organic Program without the transparency of the NOSB review. The IFPA Organic Committee maintains that this process is critical to the integrity of the organic system and that new standards be given equal assessment under a thorough review. It is no surprise that the State of California would seek to impose requirements such as the national organic standard on compost production, given the rigor of this process; however, the IFPA Organic Committee does not believe the actions of California should influence the decisions of the National Organic Program regarding what components get used in organic compost.

### **2027 Crops Sunset Reviews**

Members of the IFPA Organic Committee support the streamlined process of sunset reviews, especially for materials that have been unanimously relisted multiple times. As with current practice, IFPA maintains that there should be a mechanism that allows members to call for a vote if concerns are raised about a substance or practice as new research is released.

### **Potassium Hypochlorite**

IFPA continues its support for keeping potassium hypochlorite on the §205.601 sunset list. It is used by a majority of growers of tree fruits, tree nuts, and other organic cropping systems with irrigation lines. Potassium hypochlorite helps to ensure irrigation water meets an acceptable microbial water quality profile as required under the Food Safety Modernization Act (FSMA); to keep micro-sprinklers and fogging systems functioning properly and to prevent clogging within the irrigation system; and it provides a hypochlorite product that does not contain sodium content.

### **Soap-Based Algicide/ Demossers**

IFPA continues its support for keeping soap-based algicides and demossers on the §205.601 sunset list. These products are used as algicides, disinfectants, and sanitizers for tools in organic orchards, including irrigation systems, to combat food-borne pathogens.

### **Ammonium Carbonate**

Ammonium carbonate is critical to small producers who farm fruits and vegetables. IFPA continues its support for keeping soap-based algicide and demossers on the §205.601 sunset list. Used by many organic tree fruit growers as an attractant in insect traps, it is also used by small fruit and nut growers. Ammonium carbonate is especially effective in orchard traps used to monitor various types of flies, such as apple maggot and cherry fruit fly.

### **Soaps, Insecticidal**



The IFPA Organic Committee members emphatically underscore the importance of insecticidal soaps to ensure vegetables can grow by providing nutrients and for other uses in crop production. If this designation changes, it would be catastrophic for the entire organic vegetable industry. Insecticidal soaps are an essential tool for organic tree fruit production and used by the majority of Pacific Northwest growers. These soaps are key to many IPM programs for controlling soft-bodied insect pests, such as aphids, mealybugs, and spider mites.

### **Vitamin D3**

Vitamin D3 is absolutely critical for pest control in organic crop production. This is one of the only pest control materials allowed for rodent control, and is therefore used by a wide range of growers. If this product were to be removed, there would be virtually no other ways to prevent pests and rodents from destroying organic crops. Vitamin D3 is especially important when an organic farmer is facing a high rodent population coupled with environmental factors, such as heavy winter snow. For tree fruit, it is primarily used around bins and in confined spaces around buildings.

### **Aquatic Plant Extracts**

All organic vegetable and fruit producers heavily rely on aquatic plant extracts, such as seaweed or algae, to provide nutrients and assist in organic crop production. IFPA Organic Committee members continue their support for the use of aquatic plant extracts on the §205.601 sunset list.

These materials are used by a majority of organic tree fruit producers and are critical for perennial crop fertility programs. Soil- and foliar-applied products are used to enhance soil and plant health, particularly when a nutrient deficiency is identified.

### **Lignin Sulfonate**

Lignin Sulfonate is used by many growers for dust abatement in select areas, such as dirt roads along the borders of farms, which can be habitats for pest mites, and on driveways and loading areas. It is still used by growers as a chelating compound for foliar-applied nutrients, which improves uptake/absorption of important nutrients through foliage. Chelating makes applications more efficient and effective, therefore helping to reduce overall sprays.

### **Sodium Silicate**

Sodium Silicate is still used as a floating agent in post-harvest for fruit packing and is incredibly important for small- and medium-sized pear packers. There are no alternative methods available that are suitable for small pear packer usage, whether costly equipment upgrades or alternate substances that can cause damage to the fruit, so eliminating the use of sodium silicate would have a devastating impact on small and medium pear producers who do not have the ability to switch to a “dry” system.



### **EPA List 4 Inerts**

There is complete agreement with the subcommittee that List 4 inerts must remain listed during the rulemaking process in order to maintain continuity in pesticide formulations used by organic growers. Inerts listed in both EPA List 3 and List 4 are critical to organic production and IFPA looks forward to the opportunity to provide comments to the NOP during rulemaking.

### **Paper**

Paper has been used for a long time, and is still important as a weed control method in small gardens. Paper pots are very important in composting and are an effective way to reduce plastic. Biodegradability standards must be maintained in paper materials. Paper is used by orchard operations of all sizes, as well as by fruit tree nurseries.

### **Strychnine**

The IFPA Organic Committee supports the continued prohibition of the use of strychnine under the §205.602 Sunsets.

### **Arsenic**

The IFPA Organic Committee supports the continued prohibition of the use of arsenic under the §205.602 Sunsets.

## **Compliance, Accreditation, & Certification Subcommittee (CACS)**

### **Risk-Based Certification**

#### *Definitions*

CACS has proposed that stakeholders use a common set of definitions to create a consistent set of criteria for how operations will be assessed through the Organic Integrity Learning Center course. Overall, risk must be measurable based on potential outcomes of risk to the consumer, USDA organic reputation, and to the grower. Certain points within the process of growing organic crops may present more challenges, and IFPA members urge CACS to evaluate areas where there may be higher risk identified, and then identify mitigation through increased feasibility. A suggestion for determining the risk of an operation is to consider the potential risks that may occur within an operation of a similar size or other similar characteristics. This would help to identify patterns associated with greater risk, ensure consistency in organic standards, and limit confusion about comparing risk at various types of operations. The definitions proposed are generally well received by the Committee, and we suggest the following modifications (in bold and italics):

- **Risk-based oversight** is a systemic, cyclical approach to considering risk. This approach involves the process of identifying and prioritizing risks (via a vulnerability assessment and risk assessment, including all potential risks such as fraud risks, compliance risks, supply chain risk, and market risk, and planning, scheduling, and maintaining mitigation measures, with a goal of reducing and managing risks. Risk assessment and past performance inform the planning process.





- **Risk management** is the actionable step of the risk-based oversight approach. Risk management is the execution of the planned and scheduled tasks and processes that contribute to the overall goal of the prevention, reduction or minimization of risks, including mitigation strategies, preventive measures, implementation, and identifying changing and new risks. Risk management is only one component of the overall risk-based oversight approach.
- **Risk** is the potential exposure to deceptive, dishonest, or noncompliant actions, resulting in financial losses, reputational damage, certification status changes and/or legal consequences. Risks on organic operations can be categorized in broader terms, such as risk of noncompliances or risk to organic integrity, or more specifically, as risk of fraud, and understanding your own risks and vulnerabilities is your responsibility.
- **Vulnerability Assessment** is the review and assessment of various factors that create vulnerabilities in an operation's internal practices and across the supply chain (i.e. weak points where fraud and/or noncompliances have the greatest chances of occurring).
- **Risk Assessment** is a systematic process of evaluating the potential risks (likelihood vs severity) that may be involved in an activity or relationship, resulting in a risk evaluation determination (e.g. low, medium, high) leading to mitigations, preventative practices, policies, and programs. This may include the assessment of fraud and/or broader compliance-related risks of an operation.

### *Risk Criteria*

When evaluating the factors to define risk, IFPA members requested that evaluation around nitrogen fertilizers continue, for producers to justify applications (i.e., for soil health), and to understand the agronomic drivers in various regions through the lens of *why* some growers may use nitrogen fertilizers. A specific example highlighted by a grower within IFPA stated that the creation of mushroom compost mitigates risk through the intake and processing of nitrogen that would otherwise directly impact watersheds. Mushroom compost production is used to recycle chicken litter and equine stable bedding within a circular system. Other regional fertility resource loops include mushroom compost in the Mid Atlantic, dairy and organic feed/ silage production, and chicken pellet resource input for organic inputs in the West.

Risks associated with the use of nitrogen fertilizers include potential contamination with adjacent food industries, like steer production, resource dependency issues, importation challenges, and pathogen reduction validations for applications on high food safety risk crops.

IFPA members appreciate the consideration by CACS around how NOP communicates acute risks to certifiers. Organic Committee members support NOP using the annual training meetings to communicate new and acute risks to certifiers, encourage record keeping of these communications, and request that NOP ensure these communications align with written directives to avoid misinterpretation.



As NOP and certifiers establish common objectives and goals for assessing risk through certification, Organic Committee producers urge a review of NOP Accreditation findings across certifiers since 2002, since these may highlight the need for coordination among NOP Accreditation auditors. Certifiers have created compliance to maintain accreditation, but have also overbuilt an organic compliance point. This may put a burden on the certified operation.

#### *Oversight Activities Process and Matrix*

When considering the development of a matrix of activities for a high-risk operation's certifications and the option to reduce a low-risk operation certification burden, there have been questions raised about whether a process and matrix should be considered at this time, since we do not yet have consensus on the definition of a high-risk operation. IFPA Organic Committee members request a delay in this consideration until a clearer definition of risk is established. Producers also requested clarification on whether this will increase costs for operations, since certifiers cover the costs of oversight activities already used. One method of reduced oversight could be virtual pre-audits to supply documentation for annual inspection, which will reduce on-site audit time. Another method could be a mock random recall, similar to Food Safety Mock Recalls.

IFPA Organic Committee members align with the idea of low versus high risk in theory; however warn that the categorization of risk may create a slippery slope of certifiers that could perform activities in a way that could create differential or potentially unequal impact.

#### **Residue Testing for a Global Supply Chain**

The members of the IFPA Organic Committee appreciate the continued dialogue around residue testing, and reiterate our comments from the Spring 2025 comment around maintaining the 5% threshold of residue testing. Under other mechanisms, like a zero-tolerance policy, farmers may be penalized for unintentional contamination, which then risks their reputation, organic land, and crop supply. Members request additional clarification on how to prove intentionality for a prohibited substance, as sometimes drift or cross-contamination of equipment may be picked up by a certifier; there is currently no pathway for a grower to definitively prove that contamination was unintentional. For example, one grower identified a time when compost was unintentionally contaminated due to the truck being used to transport the material. The grower was unaware that the truck was used for non-organic transportation and didn't have knowledge of whether or not it was cleaned before transporting the organic compost and ultimately the grower was required to deregister the site.

Additionally, residue test results from a certifier may not come in a timely manner, thus limiting what actions a grower can take to mitigate against unintended residue. IFPA Organic Committee members request continued discussion on this topic and clarification or guidance around self-reporting or responsibility from the producer. Members suggested a voluntary mechanism to report steps taken to



improve organic systems to build integrity and reputation, so in the event of unintentional contamination, there is a prior record of compliance.

Committee members raised questions around whether the new definitions of risk account for drift and other methods of accidental contamination, and if not, would it be feasible to collect this data. Growers already have measures in place to avoid cross-contamination and keep any substances under the 5% threshold. IFPA Organic Committee members remain committed to minimizing potential contaminants to the maximum extent practicable, but encourage continued discussion about reducing any presence of residue and whether producing specialty crops without any residues is possible.

In response to the discussion document requesting mandatory testing based on risk, Committee members had concerns with requiring mandatory testing based on a risk criteria still being developed. We strongly discourage using the size of operation as a determination for risk, since both large and smaller growers share an equal responsibility to prevent contamination. This bifurcation could create a perverse incentive where companies are set apart based on size and not based on data. The Committee suggests that NOP create a mitigation plan, and then comply with the current 5% testing threshold, or potentially create a tiered system (similar to the food safety model) of farm sizes where the growers can identify their own risk and mitigation measures and then communicate that with NOP. We continue to defer to the Environmental Protection Agency for any updates to pesticide levels and their impact on human health.

Committee members support a broader conversation around definitions and new technology when it comes to residue testing. As NOP considers more specifications, there must be an intentional effort to differentiate whether contamination was from a source that the grower could not control, and to maintain the timeliness of testing results.

When considering the cost of residue testing, certifiers can only absorb a certain amount of the cost. If testing costs increase for certifiers, they will likely be passed along to the growers through fees. Committee members suggested NOP collaborate with state Departments of Agriculture to handle testing, since the state-level regulators have a more accurate and nuanced perspective of the growing conditions within the state, but may not have the capacity to manage oversight. As NOP continues efforts around SOE, there should be a metric or rubric to assess the effectiveness of fraud reduction.

As NOP explores the idea of a centralized database to increase transparency of instances of contamination, the IFPA Organic Committee raised the following points to address:

- Identify resolutions instead of violations – If a consumer or opposition group sees an incident through the database, it could be misconstrued and cause reputational harm to the producer. If the database focuses on when an issue is resolved, it could help build integrity for the producer and create more confidence in the strength of organic certification.





- Litigation and lawsuit potential – Members raised concerns that a central database would increase lawsuits or litigation, referencing the California Proposition 65. Food safety measures, like recalls, are already handled by the supply chain, and a database could open up the opportunity for consumers to pursue unnecessary or burdensome litigation against producers.
- Sample bias – Listing specific information may not be helpful for the organic program, but creating a process to anonymize data and assess risk by regionality could be more effective in identifying problems within the system.

Consumers already trust and understand the USDA Organic seal; therefore government directly communicating to consumers about potential problems within the system could be problematic and create unnecessary issues with production.

When it comes to substances that do not have a 5% tolerance threshold, using a blanket 0.01ppm measurement may not be adequate to address different types of substances. The Organic Committee raised concerns as some substances are lethal in small doses, whereas some are not. We encourage evaluation and discretion on a case-by-case basis, and further discussion for clarification in future NOSB meetings.

### **Consistency in Organic Seed Use**

Members of the IFPA Organic Committee appreciate NOSB's continued discussion on organic seed use and request that the committee refer to IFPA's organic seed report for additional background.

### **Materials Subcommittee (MS)**

The IFPA Organic Committee is supportive of the research priorities outlined by the materials subcommittee and does not have additional items for the research agenda.

### **Handling Subcommittee (HS)**

The general category of colors under review for removal continues to be limited in supply and availability across the supply chain. In certain instances, limited commercial availability may exist; however, the volume and quality can be prohibitive to the broad use and need.

Sizes limit use and availability for small operations with small volume needs. Overall availability limits operations of all scales. The IFPA Organic Committee recommends continuing with the current status quo until there is a sufficient market of certified organic "colors" consistently available throughout the organic supply chain. Removal of colors at this time will limit the development of organic products and markets.

### **2027 Handling Sunset Reviews**

#### **Kaolin**

IFPA supports the continued listing of kaolin as a filtration component in the manufacture of organic fruit juices. The material is particularly effective as a filtering aid in apple and grape juice processing.



### **Ozone**

Ozone is widely used as a disinfectant and sanitizer in produce packinghouses and storage facilities. It is a highly effective disinfectant and an important tool for organic handlers in controlling potential cross-contamination of microbial pathogens that pose a food safety risk in water or on food contact surfaces.

### **Carnauba Wax**

Carnauba wax is used by apple and pear handlers on an as-needed basis to protect against decay with certain varieties and to help reduce scuffing on pears during the packing process. It is a naturally occurring substance and does not pose a safety concern for human health or the environment.

### **Orange Shellac**

Orange shellac is used as needed on vegetables and fruit, in particular berries and citrus. It is an important tool for those handlers who use it in rotation with other fruit coatings on the commodities that necessitate and/or benefit from such coating.

### **Conclusion**

The IFPA Organic Committee appreciates the opportunity to comment and strongly encourages the NOSB to consider fresh produce growers when considering movement on the proposals reflected in these comments and during the votes for the continued use of certain §205.601 substances in organic production. IFPA growers continue to rely on these substances for various crops, growing regions, and production methods in organic.

We urge the NOSB to consider these recommendations to the NOP with an understanding of the unique needs of organic produce production, the variety of crops, the differences in geographical regions, and the challenges faced by growers all over the U.S. We appreciate your consideration of these comments in support of the fresh produce industry.

Sincerely,

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Sara L. Neagu-Reed  
Director, Production & Environmental Policy

