



August 12, 2011

Lisa M. Brines, Ph.D.
National List Manager
Standards Division
USDA National Organic Program
(202) 720-8405

**RE: Amendment to the Petition to add Gibberellic acid to the National List, 205.605;
Handling**

Dear Dr. Brines:

Valent BioSciences Corporation submitted a petition on September 2010 for evaluation of gibberellic acid (GA₃) to amend the National List of Allowed and Prohibited Substances (National List) by including GA₃ in the NOP National List §205.605 Non-agricultural (non-organic) substances allowed in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s)). Gibberellic acid is a non-synthetic substance manufactured through the fermentation process of the fungus *Gibberella fujikuroi* and is classified by US EPA as a bio-pesticide, plant growth regulator and it is naturally occurring in plants. GA₃ is already permitted under NOP for crop production purposes, so this petition was submitted to simply to add gibberellic acid as a post harvest application to banana to permit them to be transported effectively.

Through the present Valent BioSciences is requesting to amend the petition by adding two more post harvest uses. These uses are on post harvest citrus and postharvest pineapple.

Citrus has a limited shelf life once it is harvested with the peel aging and degrading. Post harvest treatment of citrus with gibberellic acid (GA₃) will delay the degradation and reduce the growers' financial losses.

Through new investigation gibberellic acid shows promising results in maintaining the freshness of pineapple after harvesting thus increasing the shelf life. This represents a great benefit to the industry.

Attached are letters of support for these uses provided by the organic growers.



In 1996 a petition was submitted for GA₃ to be include in NOP National List §205.601. The petition was reviewed and currently GA₃ status is "not prohibited non-synthetic".

We would appreciate if this active ingredient would be added for discussions on the agenda of the November 29 – December 2, 20011 meeting.

Sincerely,

A handwritten signature in blue ink, appearing to read "Doina Bujor", is written over the typed name.

Doina Bujor
Regulatory Manager
Valent BioSciences Corporation
870 Technology Way
Libertyville, IL 60048
Phone: 847-968-4724

Attachments



July 29, 2011

Mrs. Lisa Ahramjian
Executive Director
National Organic Standards Board

Dear Mrs. Ahramjian:

My name is Bob Blakely. I am a Director of Industry Relations for California Citrus Mutual in Exeter, California. Citrus Mutual is a voluntary association of citrus growers with close to 2,000 members, representing over 60 percent of the citrus industry in California. I am writing in support of listing *ProGibb* in the NOP register for post harvest use in the packing of our citrus fruit. A significant amount of our fruit is sold to the organic markets. Gibberellic Acid (GA3), a growth regulator found in plants, is the active ingredient in ProGibb® Plant Growth Regulator. *ProGibb* is already certified organic pre-harvest and is tolerance exempt. ProGibb is also registered for use post-harvest on conventional citrus.

Citrus is a perishable crop which once harvested has a limited shelf life. One of the major post-harvest quality problems in citrus is peel aging and degradation. As the peel ages, fruit color changes and various disorders occur making the fruit unmarketable. When this occurs fruit is rejected and destroyed. From harvest, through shipping and storage until consumers purchase citrus the amount of time can take as much as 21 days depending on the logistics.

ProGibb applied post-harvest to citrus delays fruit peel aging, maintains commercially acceptable color and reduces peel disorders. The use of *ProGibb* post-harvest is necessary in both organic and conventional citrus processing to extend the market life and consumer acceptance of citrus. Without *ProGibb*, citrus shelf-life is significantly shortened.

No other non-synthetic or synthetic substance has proved to be as efficacious and cost effective as naturally occurring Gibberellic Acid for increasing the shelf life of citrus fruit.

Thank you for your consideration in expediting the listing of ProGibb® Plant Growth Regulator in the NOP register.

Respectfully Yours,

Bob Blakely
Director of Industry Relations

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San José, Costa Rica, August 11, 2011.

Mrs.
Tracy Miedema
Chairperson
National Organic Standard Board

Mr.
Steve DeMauri
Chairperson
N.O.S.B. Handling Committee.

cc.:
Mr.
Miles McEvoy
Deputy Administrator
National Organic Program

Petition to Add the Gibberellic Acid to the National List, 205.605 Handling.

Dear Mrs. Miedema and Mr. DeMauri:

We respectfully ask you to include the Petition of the Gibberellic Acid on the next NOSB Meeting Agenda.

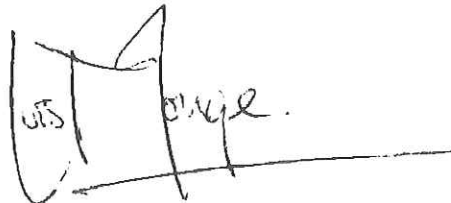
We are in full support of Valent BioSciences petition to include the use of Gibberellic Acid on §205.605. Gibberellic Acid has shown to be a key substance for organic banana handling and new investigation has reported GA3 as promissory in organic pineapple handling as well, improving the shelf life of the fruit which represent a great benefit to the industry.

Our company will attend the meeting in Savannah, Georgia and we look forward to speak in favor of the petition.

If any further information on the post harvest use of GA in Organic Bananas and/or Pineapples would be needed, please let us know.

Kind regards from Costa Rica,

Luis Monge
Organic Certifications & Quality Manager
Dole Fresh Fruit International, Ltd.

A handwritten signature in black ink, appearing to read "Luis Monge". The signature is written over a horizontal line and includes a stylized flourish at the end.



August 12, 2011

Ms. Lorraine Coke
Program Manager, USDA/AMS/TM/NOP
Room 4008-So, Ag Stop 0268
1400 Independence Avenue, S.W.
Washington, DC 20250

Dear Ms. Coke:

Re: National Organic Program Registration of Gibberellic Acid

We are contacting you to support the registration of gibberellic acid as a postharvest treatment for citrus in the National Organic Program.

The California Citrus Quality Council (CCQC) represents the California citrus industry including 3,500 growers and 110 citrus packers on technical and regulatory issues domestically and overseas. We appreciate this opportunity to comment on the need to register gibberellic acid for postharvest use on citrus.

Gibberellic acid (GA3) is a naturally occurring chemical, which is found in citrus plants. It is the active ingredient in ProGibb® Plant Growth Regulator. ProGibb® is already registered for organic pre-harvest use within the national organic program, and since it is a naturally occurring chemical it is exempt from establishing a tolerance. ProGibb is also registered for postharvest use on conventional citrus.

Citrus is a perishable crop, which once harvested, has a limited shelf life. One of the major postharvest quality problems in citrus is peel aging and degradation. As the peel ages, fruit color changes and various disorders occur making the fruit unmarketable. When this occurs fruit is rejected and destroyed. Distribution from packing to purchase takes approximately 21 days or more depending on the final destination. Treatments that prolong the shelf life can be the difference between profit and ruin.

ProGibb applied post-harvest to citrus delays fruit peel aging, maintains commercially acceptable color and reduces peel disorders. The use of *ProGibb* post-harvest is necessary in both organic and conventional citrus processing to extend the market life of citrus. Without *ProGibb*, citrus shelf-life is significantly shortened.

No other treatment has proven to be as efficacious and cost effective as gibberellic acid for increasing the shelf life of citrus fruit.

Thank you for your consideration of this petition to register gibberellic acid for postharvest use in the national organic program.

Please contact me by telephone at (530) 885-1894 or via e-mail at jcranney@calcitrusquality.org if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink that reads "JR Cranney, Jr." The letters are cursive and somewhat stylized.

James R. Cranney, Jr.
President