INTERNATIONAL FRESH PRODUCE ASSOCIATION

April 30, 2026

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-25-0914

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 Spring 2026 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.

The IFPA Organic Committee is made up of 20 volunteer leaders in the fresh 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.

Compliance, Accreditation, and Certification Subcommittee

Residue Testing for a Global Supply Chain (§205.670 &UREC) Proposal

The members of the IFPA Organic Committee appreciate the continued dialogue around residue testing and reiterate our comments from the Fall 2025 NOSB meeting, where we encourage further consideration and discussion about criteria of risk. Overall, we do not believe there is sufficient information to vote on this proposal and recommend that the vote is delayed until there is a clear definition of risk with feedback from all areas of the industry.

NOSB proposed an update to the current regulations to require certifiers to include both risk-based and random selection when determining which operations will be tested to meet existing testing requirements. The IFPA Organic Committee

reiterates concerns about the definition of "high-risk" being vague, and we would support more discussion and input from industry before the Subcommittee takes a vote on how to proceed. The term "risk" pertaining to an operation is not well identified, and various, single factors may mischaracterize a producer having a "risky operation," when the full picture is not represented. The current proposal leaves the definition of "risk" up to the certifier with no clear set of criteria to determine if an operation is "high-risk" or not. Identifying and setting a standard for certifiers will maintain consistency across the industry and take the pressure off the certifiers to arbitrarily identify risky operations.

NOSB also recommended an update to the regulatory text to allow certifiers to charge operations for the burden of cost only when the test is being conducted as part of a credible complaint or investigation; and if contamination is determined to be caused by an intentional application or failure of an operation to adhere to their OSP. Some members of the Organic Committee raised concerns about the burden of the testing being entirely on the certifiers. If certifiers are responsible for the burden and the liability of identifying risk, this could lead to misinterpretation or inconsistency depending on what certifiers use as a risk marker.

Members suggested that USDA, along with other agencies like the FDA, could utilize existing infrastructure for sampling and laboratory analysis, recall notifications, and surveillance and monitoring. Having NOP responsible for the testing responsibilities instead of passing this to certifiers and growers would level the playing field for farming operations and would prevent duplicative infrastructure, while building on existing food safety processes at the state and national level.

The NOSB recommendation to link § 205.504 (evidence of expertise and ability) and § 205.670 Inspection and testing of agricultural products to be sold or labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" together raised no objection from the Organic Committee. While the Organic Committee opposes a completely open public database due to liability concerns, there is openness to a provider or certifier having access to this information. If such information is made available, the Organic Committee would like to work with NOP to ensure certifiers have a clear definition of risk criteria, since a database or record of positives does not always show the full picture of the operation in question.

CACS recommends NOP revise the regulatory text to require notification of downstream buyers when residues exceed action thresholds or willful violations have occurred as determined by a certifier or NOP. Many growers already do this to prioritize food safety and product integrity, and generally support the concept of downstream notification, but urges the consideration of what is reasonable for fresh produce growers. The Committee raised questions about whether (or how) NOP will be enforcing downstream notifications and asked that NOP engage with fresh produce growers for a more specific notification system. Because NOP cannot stop selling products, steps around the focus on preventing something contaminated from entering the market are already taken. Once a product is out of the grower's facility, there are many factors that remain out of the grower's scope. Though a grower may harvest a crop, the supply chain and point of sale may be very different than what was originally provided due to a variety of preservation and transportation methods. Ultimately, an extra burden of cost on growers for an action that may not have been their responsibility could drive production rates down.

In the event of unavoidable residual environmental contamination (UREC), the IFPA Organic Committee defers to the Environmental Protection Agency and the Food and Drug Administration to determine the level of safety within UREC. IFPA Organic Committee members remain committed to minimizing potential contaminants to the maximum extent practicable but encourage continued discussion about reducing any presence of unavoidable residue and reiterates the importance of maintaining the EPA and FDA thresholds in crop production.

E-Commerce Labeling Proposal

The IFPA Organic Committee appreciates the opportunity to comment on the petition request that NOP amend the USDA organic regulations to require online retailers/resellers to provide consistent certification information to consumers; specifically: to require "certified organic by * * *" statements.

While this information is readily available in brick-and-mortar stores (on the product's label); it is not always available online, where a full product label may not be visible to the buyer. The IFPA Organic Committee recommends that NOSB should not approve the use of guidance, and instead hold a meeting to discuss and draft a formal regulation to address this issue. Growers noted that guidance will not require any changes, and it is key that certification information is presented online, particularly for fresh produce that comes in bundles or packages and may not be labeled at point-of-sale. One member of the IFPA Organic Committee suggested an amendment to clarify packaged and unpackaged products, and to revise the definition of "Retail Establishment" to include online marketplaces and supply chains. The Organic Committee does not believe this issue is ready for a vote, and e-commerce guidance needs additional feedback and a robust strategy before moving forward.

Crops Subcommittee

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 management of pests. 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. The IFPA Organic Committee wholeheartedly supports this change and appreciates NOSB for recognizing the importance of pear ester traps and lures to prevent crop damage by the codling moth.

§ 205.601 Crops Sunsets

Chlorine Materials

The Crops Subcommittee has requested information on chlorine materials, specifically on calcium hypochlorite, chlorine dioxide, hypochlorous acid, and sodium hypochlorite, as synthetic substances allowed for use in organic crop production. The IFPA Organic Committee emphasizes the importance for chlorine materials in use for food safety, sanitation, and pest control, and recommends the substances continue to be allowed for organic production. The Committee noted that different

sanitizers are needed for different field equipment and areas of the packing line, and for different pathogens and bacterium, therefore serving a critical role at the intersection of food production and consumer safety. While chlorine materials aren't always needed to grow the crop, without them, there could be foodborne illness outbreaks and issues with meeting the regulatory requirements for products meant for fresh consumption. Chlorine products are very critical for packing houses, crop production, and disease prevention.

Ozone Gas

Ozone gas is used in irrigation systems as the most effective and least toxic method of cleaning pipes. If growers can afford to use ozone, they will, and the IFPA Organic Committee supports the continued use of ozone gas in organic production. An alternative to ozone gas would be throwing out and replacing irrigation methods annually, which is costly and burdensome for farming operations.

Peracetic Acid

The IFPA Organic Committee absolutely supports the use of peracetic acid in organic production. Peracetic acid is a critical material for orchards and in packing houses to prevent fire blight in various tree crops, for example 'Bartlett' and 'dAnjou' pears, and 'Gala', 'Cameo,' and 'Red Delicious' apples. Peracetic acid also works as a disinfectant, similar to chlorine. While it is more costly than chlorine substances, it does not react to certain pH levels and fills in a specific spot in irrigation systems that may not be reached or affected by chlorine.

Magnesium Oxide

The IFPA Organic Committee supports the continued allowance of magnesium oxide in organic production to be used on an "as needed" basis. Magnesium oxide is the most effective tool in viscosity-control function for liquid humates by keeping minerals in suspension.

EPA List 3 – Inerts of Unknown Toxicity

The EPA List 3 Inerts of Unknown Toxicity is key in the use of pheromones, lures, and traps for pest control, mating disruption, and crop protection. The IFPA Organic Committee supports the classification of the EPA List 3 Inerts of Unknown Toxicity on the approved list of substances for use until there is a better system of pest controls implemented through the NOP's current rulemaking process.

§ 205.602 Crops Sunsets

Calcium Chloride

The IFPA Organic Committee supports the decision to prohibit calcium chloride in organic production unless used for specific physiological disorders. On some occasions, Honeycrisp apples are found to be deficient in calcium, and calcium chloride is an effective tool allowed in these specific circumstances. We support the annotation and do not have opposition to keeping this substance on the § 205.602 sunsets list.

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Rotenone
The IFPA Organic Committee agrees that rotenone should not be allowed in organic production.

Materials Subcommittee

Research Priorities
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 § 205.605(b) Sunsets

Chlorine Materials
The IFPA Organic Committee emphasizes the importance of chlorine materials in use for food safety, sanitation, and pest control, and recommends the substances are allowed for organic production, and reiterates our comments from the previous chlorines listing in the Crops Subcommittee section.

One Organic Committee member noted that the safety of chlorine often comes up in other Subcommittees. The Crops and Livestock Subcommittees often do not have concerns about safety, while the Handling Subcommittee often raises many questions about whether the substances are safe for use in organic production. The Committee asks that there be consistency and streamlining of agenda items among the NOSB Subcommittees around sunset materials.

Conclusion
The IFPA Organic Committee recognizes NOSB's hard work on these important issues and appreciates the opportunity to provide feedback and comments on the Spring 2026 NOSB Agenda. The Organic Committee strongly encourages the board to consider the views and comments from the fresh organic produce sector when making critical decisions about organic production, certification and handling.

We urge the NOSB to reach out with any questions and carry forward the IFPA Organic Committee's recommendations to NOP with an eye toward recognizing the diverse challenges within organic fruit and vegetable production. We appreciate your consideration of these comments in support of the fresh produce industry.

Sincerely,

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Director, Production & Environmental Policy

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