

March 7, 2013

Joel Kroin
Hortus USA Corp.
PO Box 1956 Old Chelsea Station
New York NY 10113
support@hortus.com

NOSB
USDA AMS NOP
Washington, DC

RE: Comment submitted for the NOSB meeting April 9-11, 2013.
Petition to add IBA, Indole butyric acid, to the NOP National List of Allowed and Prohibited Substances.

I am pleased to support our petition to include IBA on the List of Allowed Substances. Organic Growers have needed IBA for a long time. IBA naturally produced by plants, is used with products identical to the natural source. Having many uses, IBA is compatible with sustainable agriculture.

IBA:

- is **naturally occurring**.
- is **safe to the eco-system**.
- is **used to improve plant health**.
- brings **improved crop selection**.
- will **bring organic crops to market faster**.
- will **increase the number of organic crop varieties**.

Plant Growers sought ways to reproduce plants since ancient times. Variable and difficult, grafting, seeds, divisions, and layering are not always the best or possible ways to make new plants. IBA, found in 1934, is now the most used substance to reproduce stock plants by the rooting of cuttings. Naturally occurring in plants, IBA has proven safe to the environment, humans, workers in production, and animals. IBA use and production is done under exacting US EPA standards. The US EPA trusts IBA, allowing use on food crops without 'tolerance'.

Presently without IBA on the list, Organic Growers have no 'Allowed' Substances to root cuttings resulting in limits to crops and how to produce them. After IBA is approved, Organic Growers will bring more and better Organic crops to consumers.

NATURAL: IBA is compatible with and needed for sustainable agriculture due to it being naturally produced by plants.

Use of IBA by Organic Growers is compatible with Organic growing because it is, in fact, naturally produced by plants. IBA forms in leaves during photosynthesis. For root formation, plants translocate IBA by polar transport to the basal end of cuttings where it is stored. There,

IBA interacts with other natural substances to form new roots. When plants do not produce enough IBA in storage, roots do not form. Growers add more IBA to the plants, then roots form. This is compatible with Organic production. There is no difference of activity of the added or naturally produced IBA.

ORGANIC SAFE: IBA is compatible with sustainable agriculture by having low impurities and assuring there is no contamination of the ecosystem.

Worldwide IBA is produced in small quantities under laboratory controls. There is minimal risk to the environment by contaminants to synthetic IBA. IBA, is required to be registered by the US EPA. Registration regulation states: “The certified percent limits apply to each impurity present in the product at greater than 0.1% by weight (needs only upper limit). These certified percent limits are legally enforceable!” IBA, used in small amounts; the maximum allowed ‘contamination’ is five billionth of a gram, too small to measure.

IMPROVED ORGANIC PLANT HEALTH: IBA is compatible with and needed for sustainable agriculture by overcoming pathogens and improving plant health and reducing needs for other environmental controls by Organic Growers.

Many difficult to propagate are easily propagated from cuttings using IBA. For cuttings that are prone to pathogens, like Phytophthora, using IBA overcomes these problems. Propagation from cuttings using IBA, allows cuttings to rapidly develop strong roots, thereby improving plant health with resistance to pathogens.

IMPROVED ORGANIC CROP SELECTION: IBA is compatible with and needed for sustainable agriculture by providing improved scent and taste for anyone who cooks or eats.

Plants propagated from cuttings using IBA have the exact characteristics as parent plants. Seed propagation has plant variability. Using IBA, by selecting the stock plants for the best scent and taste, and form, new plants from cuttings are the same as the plants from whom they came.

BRING ORGANIC CROPS TO MARKET FASTER: IBA is compatible with and needed for sustainable agriculture by bringing Organic crops to Markets and Consumers faster.

Plants like Strawberry can be propagated using IBA. Organic Growers must grow the plants Organic for a year, selling crops as ‘conventional’. When propagated from cuttings using approved IBA, all the crop can be sold as ‘Organic’. Use of IBA will bring more ‘Organic’ crops to Market.

BRING NEW ORGANIC CROPS TO MARKET: IBA is compatible with and needed for sustainable agriculture by bringing a greater variety of Organic crops to Consumers.

Many seedless crops, like Sweet Seedless Tomato, only have 'conventional' hybrid seed. These crops can be propagated from cuttings using IBA. When only conventional seed is available, using approved IBA will allow Growers to bring more varieties of Organic crops to Market.

Give Organic Growers, Markets and Consumers a Choice. Vote YES for IBA.

I look forward to your good news.

Regards

A handwritten signature in blue ink that reads "Joel Kroin". The signature is fluid and cursive, with the first name "Joel" and last name "Kroin" clearly distinguishable.

Joel Kroin
President
Hortus USA Corp.