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WESTERN FARM SERVICE

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[Aug 8,2005]

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW. Room 4008
So., Ag Stop 0268
Washington, DC 20250

Email: National.List@usda.gov

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Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset review, Docket number TM-04-07. Western Farm Service supports the allowance of the following substance:

Lime Sulfur (Calcium Polysulfide), and hydrated lime and elemental sulfur from section 205.601 (e) and (i). Hydrated lime and elemental sulfur are used in the production of Lime Sulfur Solution. Lime sulfur is an essential product used on several thousand acres of apples, grapes, peaches, blueberries, and other tree and vine crops to control fungus, mites and insects. This product has Organic Materials Review Institute approval and has been used by large and small growers. In some cases lime sulfur is the only available product organic growers have to control the above pests. Lime Sulfur is the only product that I can use in the winter time to control over wintering powdery mildew on grape vine canes. Lime sulfur has been used successfully for about 200 years with no recorded form of resistance.

Sincerely,

Michael Hollarman
[Pest control advisor