

United States Department of Agriculture
Agricultural Marketing Service | National Organic Program
Document Cover Sheet

<https://www.ams.usda.gov/rules-regulations/organic/petitioned-substances>

Document Type:

National List Petition or Petition Update

A petition is a request to amend the USDA National Organic Program's National List of Allowed and Prohibited Substances (National List).

Any person may submit a petition to have a substance evaluated by the National Organic Standards Board (7 CFR 205.607(a)).

Guidelines for submitting a petition are available in the NOP Handbook as NOP 3011, National List Petition Guidelines.

Petitions are posted for the public on the NOP website for Petitioned Substances.

Technical Report

A technical report is developed in response to a petition to amend the National List. Reports are also developed to assist in the review of substances that are already on the National List.

Technical reports are completed by third-party contractors and are available to the public on the NOP website for Petitioned Substances.

Contractor names and dates completed are available in the report.

Ethylene

Handling/Processing

Identification of Petitioned Substance

	13	
Chemical Names:	14	CAS Numbers:
acetene; C ₂ H ₄ ; elayl; ethene	15	74-85-1
	16	
Other Name:	17	Other Codes:
bicarburreted hydrogen; olefiant gas	18	UN II: 91GW059KN7
	19	EPA: PC code 41901
Trade Names:	20	EC number: 200-815-3
Banana Gas; Color Ripe; Ethylene; Fruit Ripening	21	
Ethylene; Natur-Ripe		

Summary of Petitioned Use

The United States Department of Agriculture (USDA) National Organic Program (NOP) included ethylene on National List of Allowed and Prohibited Substances (hereafter referred to as the National List) at 7 CFR 205.601(k) as originally published December 2000, for use to regulate flowering in pineapple (65 FR 80547). It was also listed for post-harvest handling to ripen tropical fruit at §205.605(b). In November of 2003, the NOP changed the annotation for the post-harvest allowance to also allow for degreening of citrus (68 FR 61987). This Handling technical report focuses on the post-harvest handling uses of ethylene for tropical fruit ripening and citrus degreening, while the Crops technical report principally addresses the use of ethylene to regulate pineapple flowering.

Characterization of Petitioned Substance

Composition of the Substance:

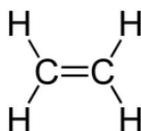


Figure 1: Structure of ethylene (CanHealth, 2016)

Ethylene is the simplest of the alkenes. Alkenes are defined as hydrocarbons with a carbon-carbon double bond (Bruice, 2001). Hydrogen atoms surround the two-carbon chain. The structure is analogous to ethane (C₂H₆), but with a double bond rather than a single bond and fewer hydrogen atoms (see Figure 1).

Ethylene is a colorless, flammable gas that is lighter than air and has a sweet odor and taste (NCBI, 2022a). When ignited, it can quickly burn back to the source of the leak. It can be shipped as a gas in canisters, or as a refrigerated, pressurized liquid (cryogenic liquid) which must be shipped below 50°F (10°C). Fruit producers and handlers sometimes make ethylene on site, converting ethanol with a catalytic generator (see *Evaluation Question #2*). Vapors arising from the boiling liquid are lighter than air (NCBI, 2022a). It is non-toxic, but it is an asphyxiant (NCBI, 2022a). Under prolonged exposure to fire or intense heat, containers of ethylene may rupture violently and rocket (NCBI, 2022a).

56 Synthetic ethylene gas used in crop production is chemically identical to the natural form produced by
57 plants (Abeles, 1992; Bartholomew, 2014).

58
59 **Source or Origin of the Substance:**

60 Most ethylene gas manufactured globally is made as a pyrolysis product of petroleum hydrocarbon
61 feedstocks, such as natural gas liquids or crude oil (NCBI, 2022a; Zimmerman & Waltz, 2011). Ethylene gas
62 can also be produced in small quantities in on-site fruit ripening facilities by catalytic generators from
63 ethanol (Zimmerman & Waltz, 2011; NW Hort. Council, 2008).

64
65 **Properties of the Substance:**

66 Ethylene is a colorless gas with a sweet odor and taste, and is lighter than air.

67
68

Table 1: Chemical and Physical Properties of Ethylene

Property	Value ^a
Physical State and Appearance	Colorless gas with a sweet odor. Pressurized liquid when shipped below 50°F.
Odor	Sweet odor
Taste	Sweet taste
Color	Colorless
Molecular Weight	28.05 g/mol
Solubility	Slightly soluble in water, 131 mg/L at 25 °C. Very soluble in ethanol, ether; soluble in acetone, benzene.
Boiling Point	-103.7 °C
Melting Point	-169.0 °C
Vapor Pressure	0.978 (lighter than air)
Stability	Stable under recommended storage conditions.

^a Source: (National Institutes of Health: <https://pubchem.ncbi.nlm.nih.gov/compound/6325>)

69
70

71 **Specific Uses of the Substance:**

72
73

Ethylene is used in organic post-harvest handling for ripening of tropical fruit and degreening of citrus.

74 Ethylene products are labeled in the U.S. for ripening avocados, bananas, kiwis, melons, mangos, papayas,
75 pears, persimmon, pineapple, stone fruits, tomatoes, and other fruiting vegetables (Airgas, 2011;
76 Livingston, 2005). Ethylene products are also labeled for sprout suppression in stored potatoes (Airgas,
77 2011) and to accelerate flue curing of tobacco (Livingston, 2008).

78

79 For bananas, treatment with ethylene gas allows traders to minimize loss in transportation and to release
80 product in a timely manner at the desired ripening stage (Maduwanthi & Marapana, 2019). Producers of
81 dried mango and papaya products use ethylene gas in order to obtain uniform ripening and thereby
82 provide a predictable supply for drying. Ethylene treatment also prevents loss from extra handling and
83 multiple sorting operations, as mangos and papayas naturally ripen at uneven rates (Santero, 1999).

84

85 For post-harvest ripening of tropical fruit, producers or handlers introduce ethylene into sealed ripening
86 rooms that are controlled for temperature, humidity, ventilation and air circulation (Kays & Beaudry,
87 1987). Different products require different rates of ethylene and time periods for holding. For instance,
88 bananas are gassed at concentrations of 100 ppm for 24 hours, then held in the ripening room for 6-7 days
89 before being shipped to retailers. Ethylene gas can be introduced using pressurized bottles of gas (steel
90 cylinders) in a “one shot” method, or by a flow-through system where the gas is slowly metered into a
91 vented room where fresh air is constantly being introduced. The flow-through method prevents a build-up
92 of carbon dioxide and maintains the ethylene concentration longer (Kays & Beaudry, 1987).

93

94 Handlers also use catalytic generators on site for ripening rooms that produce ethylene by a dehydration
95 process using a solid bed catalyst. These generators produce a relatively pure source of ethylene, which is
96 diluted with air as it goes into the ripening room. The primary advantage of catalytic generators is safety

97 (less chance of fire or explosion). Improper use of bottled gas cylinders has resulted in serious accidents
98 (Kays & Beaudry, 1987).

99
100 Handlers degreen citrus in a similar manner as for ripening of tropical fruit, by placing in a controlled
101 ripening room (Airgas, 2011). However, ethylene levels used are much lower at 1-10 ppm (Airgas, 2011).
102 Handlers use degreening methods for early varieties of citrus that are physiologically ripe, to accelerate
103 peel color change in order to extend the market season. It is also used in warm, tropical climates like
104 Florida and India where natural color development is weaker (Mayuoni, et al., 2011).

105
106 The USDA NOP and the National Organic Standards Board (NOSB) have not provided a definition of the
107 term “tropical fruit.” The NOSB voted in October 1999 to approve the use of ethylene for ripening of
108 “tropical fruit” and for degreening of citrus. The NOSB recommendation did not specify which types of
109 tropical fruit, although the early Technical Advisory Panel review mentioned bananas, mangos, and
110 papayas (NOP 1999b). The UN Food and Agriculture Organization (FAO) considers that the “major”
111 tropical fruits are pineapple, avocado, papaya, and the commodity group that includes mango,
112 mangosteen, and guava (FAO, 2011). There are many other species of fruit that are grown in tropical
113 regions. The website for a manufacturer of catalytic generators describes uses for organic producers,
114 including: “bananas, mangoes, avocados, and perhaps more, contact your certification agency” (Catalytic
115 Generators, 2022).

116
117 **Approved Legal Uses of the Substance:**

118
119 *Environmental Protection Agency (EPA)*
120 Ethylene is considered a plant growth regulator (pesticide) and has an exemption from the requirement of
121 a tolerance for residues at 40 CFR 180.1016:

122
123 §180.1016. Ethylene is exempted from the requirement of a tolerance for residues when:
124 a. For all food commodities, it is used as a plant regulator on plants, seeds, or cuttings and on all
125 food commodities after harvest and when applied in accordance with good agricultural
126 practices.

127
128 In the United States, pesticide manufacturers must register their products with the EPA as well as the
129 appropriate state pesticide control agencies (EPA, 2022; NPIC, 2022).

130
131 *USDA Animal Plant Health and Inspection Service (APHIS)*
132 USDA APHIS has an active program to control witchweed, a parasitic plant that can significantly damage
133 corn, rice, sorghum, and sugarcane. In 2021, APHIS worked with cooperating farmers to treat 999 acres out
134 of an estimated 1,600 acres infested. Methods used included tillage, herbicides, hand pulling, and the use of
135 ethylene gas injection to cause premature seed sprouting (USDA APHIS, 2022; EPA, 1995).

136
137 *United States Food and Drug Administration (FDA)*
138 FDA includes “treating to manipulate ripening” under the definition of “manufacturing /processing” at
139 21 CFR 117.5 and 21 CFR 112.3. These food safety regulations consider that “treatment to manipulate
140 ripening of raw agricultural commodities (such as by treating produce with ethylene gas), and packaging
141 and labeling the treated raw agricultural commodities, without additional manufacturing/processing, is
142 within the ‘farm’ definition.” This means that use of on-farm ripening rooms would not cause a farm to be
143 considered a manufacturing facility, subject to additional regulation under FDA food safety rules.

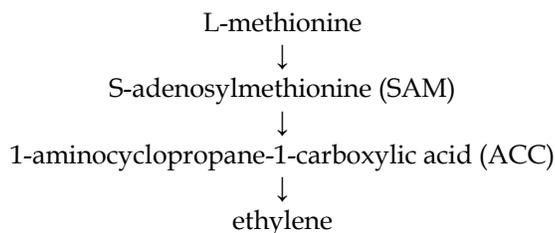
144
145 **Action of the Substance:**

146
147 Ethylene is a plant growth regulator that is produced naturally by plants and has effects on many aspects
148 of plant growth, development, and survival, including (Chang, 2016):
149 • seed germination
150 • shoot growth
151 • root development

- 152 • flowering, sex determination
- 153 • fruit ripening
- 154 • abscission of leaves and fruits
- 155 • senescence of flowers and leaves

156
157 Ethylene also has a role in plant adaptation to a variety of stresses, such as drought, flooding, pathogen
158 attack and high salinity (Chang, 2016).

159
160 Ethylene is biosynthesized by a series of reactions which transform methionine into ethylene:



170 The biosynthesis process is regulated at each step by enzymes and other factors that control the amount of
171 ethylene produced (Chang, 2016; Schaller, 2002). Ethylene can promote or inhibit growth and senescence
172 processes in plants, depending on its concentration, timing of internal production or external application,
173 and the plant species (Iqbal, 2017).¹ The specific mechanism of action of ethylene in plants continues to be
174 under active investigation. Plants increase the production of ethylene-related enzymes in response to
175 environmental cues and stresses such as wounding, drought, low temperature, or flooding (Chang, 2016).

176
177 In general, ethylene gas is produced in fruit when physiological maturity is reached. Bananas, papayas,
178 mangoes and other fruits such as apple, avocado, fig, guava, kiwi, passion fruit, pear, peach, persimmon,
179 plum, sapodilla and tomato are considered “climacteric” fruits (Maduwanthi & Marapana, 2019). This
180 means that as ripening proceeds, there is a strong peak in respiration rate of the fruit, accompanied by high
181 levels of internal ethylene production.² Non-climacteric fruits include citrus, pineapple, pomegranate,
182 melons, strawberry, and grape, among others. In non-climacteric fruits, the respiration rate is almost
183 constant, or shows a steady decline until senescence occurs, with little or no increase in internal ethylene
184 production. Climacteric fruits are capable of ripening after harvest, and generally show a response to
185 exogenous ethylene. The gas triggers the chemical changes (starch conversion to sugar, cell wall softening)
186 which take place at ripening. This causes them to ripen more rapidly and to produce more ethylene
187 naturally (Maduwanthi & Marapana, 2019).

188
189 When used for degreening of citrus, ethylene does not stimulate ripening of the fruit. Instead, ethylene
190 affects the ripening-related processes that lead to the destruction of chlorophyll and accumulation of
191 orange/yellow carotenoids in the peel tissue (Mayuoni et al., 2011).

192 193 **Combinations of the Substance:**

194
195 Ethylene is a colorless gas used in compressed gas form (bottled), or generated on-site in gas form.

196
197 There are currently five active registrants of agricultural grades of ethylene gas in the U.S., with seven
198 labeled products. They are labeled with ethylene concentrations ranging from 98.5% to 99.9% (NPIRS,
199 2022). One product (Banana Gas 32, Praxair) is labeled as containing 6.3% ethylene and 93.7% carbon
200 dioxide. Ethylene used in post-harvest ripening is sometimes combined with nitrogen gas to limit
201 flammability (NWHort, 2008).

¹ Senescence is a process of deterioration due to age; biological aging.

² The respiration rate is the rate at which the cell breaks down stored carbohydrates in the presence of oxygen, to produce carbon dioxide, water, and stored energy (ATP).

Status**Historic Use:**

The NOP added ethylene to the National List as published December 2000 for use to regulate flowering in pineapple (FR 65 80547). It was also included for post-harvest handling to ripen tropical fruit. In November of 2003, the NOP made a change to the annotation for the post-harvest allowance to also allow for degreening of citrus (68 FR 61987). Prior to the USDA organic regulations, private certifiers and state programs in the U.S. generally allowed ethylene for use to ripen bananas, and some permitted ripening of mangos (NOP, 1999b).

The NOSB voted in October 1999 to recommend approval of the use of ethylene for ripening of “tropical fruit” and for degreening citrus. The NOSB recommendation did not define tropical fruit, although the Technical Advisory Panel review mentioned bananas, mangos, and papayas (NOP, 1999b). They also voted at that meeting to reject the use of calcium carbide for ripening, and the use of ethylene to improve bean sprout production.³ A petition to modify the handling annotation to permit ethylene gas use for ripening pears was received by NOP in 2008, however the NOSB voted to reject this use in November 2008.

Early uses of natural ethylene included the gashing (wounding) of figs in the Middle East to promote fruit growth and ripening, and the use of weights to encourage bean sprout thickening (Abeles, 1992). Both cases resulted in stress-induced ethylene production by the plants (Abeles, 1992). Farmers have long used smoke (e.g., from wood or combusted kerosene) or off-gassing from ripe fruit to hasten fruit ripening, even before ethylene was recognized as the active agent (Collins, 1960; Kays & Beaudry, 1987).

Organic Foods Production Act, USDA National Organic Program regulation*Organic Foods Production Act of 1990:*

Ethylene is not specifically mentioned in the Organic Foods Production Act. It is not specifically mentioned as an allowed class of materials at 7 U.S.C. 6517(c)(1)(B), however it could be considered a “production aid,” which is a permitted class.

USDA NOP regulation:

Ethylene is approved for organic crop use:

7 CFR 205.601(k) as plant growth regulators. (1) Ethylene gas - for regulation of pineapple flowering.

Ethylene is also approved for organic handling use:

7 CFR 205.605(b) Ethylene - allowed for postharvest ripening of tropical fruit and degreening of citrus.

International*Canada, Canadian General Standards Board – CAN/CGSB-32.311-2020 Organic Production Systems Permitted Substances Lists*

Ethylene is allowed for organic use under the Canadian Organic Production Systems, General Principles and Management Standards (CAN/CGSB-32.310-2020). Clause 1.5 states that plant growth regulators are prohibited except if listed in the Permitted Substances Lists (PSL), CAN/CGSB-32.311.

The PSL states at Table 8.3 - Post-harvest substances:

³ Calcium carbide reacts with water to form acetylene, which degrades to yield ethylene. It is still used in some countries to induce flowering in pineapple by directly applying the granules into the center whorl of leaves. It also is used in some countries in sachets in fruit boxes to ripen bananas or mangos. It is not legal in the U.S. or Sri Lanka due to food safety concerns (Maduwanthi & Marapana, 2019).

253
254 "Ethylene: For post-harvest ripening of tropical fruit and degreening of citrus and to control
255 sprouting of potatoes post-harvest in holding bins."
256
257 *CODEX Alimentarius Commission – Guidelines for the Production, Processing, Labelling and Marketing of*
258 *Organically Produced Foods (GL 32-1999)*
259 Codex guidelines do not mention the use of ethylene, and it is not included in Annex 2 as a permitted
260 substance (Codex, 2007).
261
262 *European Economic Community (EEC) Council Regulation – EC No. 834/2007, 889/2008, 2018/848 and 2021/1165*
263 *Ethylene is permitted as listed in Annex 2, Pesticides – plant protection products.*
264
265 "Ethylene: Degreening bananas, kiwis and kakis; Degreening of citrus fruit only as part of a
266 strategy for the prevention of fruit fly damage in citrus; Flower induction of pineapple; sprouting
267 inhibition in potatoes and onions" (EEC, 2008).
268
269 The most current EU organic standards, 2018/848, which became enforceable in January 2022, permit
270 ethylene under 2021/1165 Annex I, "Active substances contained in plant protection products authorised
271 for use in organic production as referred to in point (a) of Article 24(1) of Regulation (EU) 2018/848."
272
273 "Only on bananas and potatoes; however, it may also be used on citrus as part of a strategy for the
274 prevention of fruit fly damage."
275
276 *Japan Agricultural Standard (JAS) for Organic Production*
277 The JAS standards (JAS, 2017) list ethylene in Appended Table 5, as:
278
279 "Ethylene, Limited to those used for ripening bananas, kiwifruits and avocados after harvest."
280
281 *IFOAM – Organics International*
282 Ethylene is listed as approved in Appendix 4 – Table 1: List of approved additives and processing/post-
283 harvest handling aids:
284
285 "Ethylene: De-greening of citrus and ripening." (IFOAM, 2018)
286

Evaluation Questions for Substances to be used in Organic Handling

288
289 **Evaluation Question #1: Describe the most prevalent processes used to manufacture or formulate the**
290 **petitioned substance. Further, describe any chemical change that may occur during manufacture or**
291 **formulation of the petitioned substance when this substance is extracted from naturally occurring plant,**
292 **animal, or mineral sources (7 U.S.C. § 6502 (21)).**
293 *Thermal cracking*
294 Ethylene is the petrochemical produced in the largest quantities worldwide (IARC, 1994). In 2014, world
295 ethylene production was 134 million (metric) tonnes (Lazonby, 2017). As of 1994, over 95% of worldwide
296 annual production is based on thermal "cracking" of petroleum hydrocarbons with steam (IARC, 1994).
297 These fractions are obtained from drilling (or hydrofracturing) of oil or natural gas. Thermal cracking
298 (sometimes referred to as pyrolysis) is a chemical process by which long chain hydrocarbons with higher
299 molecular masses are converted to short chain hydrocarbons of lower molecular mass.
300
301 Various feedstocks, including ethane, propane, butanes, naphthas and gas oils are used to produce
302 ethylene, depending on availability, price, and products desired (Lazonby, 2017). Naphthas are the
303 principal raw material used in western Europe and Japan, accounting for over 80% of the ethylene
304 produced. Ethane is the primary feedstock in the U.S., followed by propane, naphthas, gas oils, and butane
305 (Zimmerman & Waltz, 2011).
306

307 In thermal cracking the feedstock gases (ethane, propane or butane) or the liquids (naphtha or gas-oil) are
308 preheated and vaporized, and are mixed with steam and heated to 1050-1150 K (777-877 °C) in a tubular
309 reactor. The high temperature and pressure cause the long chain hydrocarbon to be converted to low
310 relative molecular mass alkenes plus by-products (Lazonby, 2014).

311

312 World use of ethylene (134 million tonnes, 2014) (Lazonby, 2017)

- 313 • 60% - polyethylene
- 314 • 16% - ethylene oxide
- 315 • 11% dichloro-1,2-ethane (precursor to PVC, polyvinyl chloride)
- 316 • 5% - ethylbenzene (precursor to polystyrene)

317

318 A “relatively small” amount of industrially produced ethylene gas is used for agriculture and controlled
319 ripening (IARC, 1994). No estimate was found of the actual amount used in agriculture or post-harvest
320 ripening per year.

321

322 *Catalytic cracking*

323 Catalytic cracking uses a catalyst, typically a zeolite, which adsorbs the long-chain hydrocarbon feedstocks
324 and removes hydrogen atoms.⁴ This causes the long chains to split into shorter chain molecules with
325 double bonds, which are useful to the petrochemical industry. The feedstock is gas oil, which is vaporized,
326 passed through a fine zeolite powder, and heated to 700-800 K (427 - 527 °C) in a reactor. The products
327 behave like a fluid and continuously flow out of the furnace with the cracking products. The temperature,
328 residence time, and the catalyst determine the product proportions (Lazonby, 2014).

329

330 *Dehydration of ethanol*

331 Dehydration of ethanol is another commercial route to ethylene (IARC, 1994; Zimmerman & Waltz, 2011;
332 Fan 2013). In the catalytic dehydration of ethanol to form ethylene, an acid catalyst first protonates the
333 hydroxyl group, which leaves as a water molecule. The conjugate base of the catalyst then deprotonates the
334 methyl group, and the hydrocarbon rearranges into ethylene (Fan, 2013). This method is not used
335 commonly to produce large volumes of ethylene as it is endothermic with a high optimal reaction
336 temperature (180-500 °C), which makes the ethylene expensive to produce. Dehydration of bioethanol is
337 occurring in Brazil and India and holds promise for producing ethylene from non-fossil fuel sources
338 (bioethanol from sugar cane or cellulose). At present the output is relatively limited, and used for further
339 production of polyethylene (Fan, 2013; Lazonby, 2017; Schill, 2010).

340

341 *Catalytic generators*

342 Small catalytic generators are used in sealed ripening rooms to dehydrate ethanol into ethylene, and can
343 deliver controlled levels of ethylene gas to ripen fruit, e.g., 100-150 ppm for bananas. (NWHort 2008,
344 Catalytic Generators 2022). This process uses dehydration of ethanol by passing it over a bed of solid
345 catalyst held at high temperatures. The catalysts are typically activated alumina and phosphoric acid or
346 zinc oxide with alumina (Kays & Beaudry, 1987).

347

348 **Evaluation Question #2: Discuss whether the petitioned substance is formulated or manufactured by a**
349 **chemical process, or created by naturally occurring biological processes (7 U.S.C. § 6502 (21)). Discuss whether**
350 **the petitioned substance is derived from an agricultural source.**

351 As described in *Evaluation Question #1*, the principal source of commercial ethylene is from thermal or
352 catalytic cracking of hydrocarbon feedstocks such as natural gas or crude oil. During this process chemical
353 bonds within the hydrocarbon molecules are broken, and a different chemical substance is produced.

354

355 Catalytic cracking uses a catalyst, typically a zeolite, which absorbs the long-chain hydrocarbon feedstocks
356 by removing hydrogen atoms, and causes the long chains to split into shorter chain molecules with double
357 bonds (Lazonby, 2014). Small catalytic generators dehydrate ethanol by a similar process (Kays & Beaudry,
358 1987).

359

⁴ Zeolites are hydrated aluminum silicate compounds that may occur naturally as minerals but may also be produced synthetically.

360 All of these methods involve reactions which produce a chemically changed substance (ethylene) from
361 either petroleum feedstocks, or from dehydration of ethanol mediated by catalysts. Thus all these forms
362 should be considered synthetic (NOP, 2016a) and from nonagricultural sources (NOP, 2016b).

363
364 **Evaluation Question #3: If the substance is a synthetic substance, provide a list of nonsynthetic or natural**
365 **source(s) of the petitioned substance (7 CFR 205.600(b)(1)).**

366 A traditional method in Sri Lanka for ripening bananas involves laying them in a pit covered with banana
367 leaves or a sheet cover. Smoke generated from burning dried leaves is directed into the pit. Smoking
368 induces faster ripening, but compared to other methods it led to less marketability due to blackening and
369 over-softening (Maduwanthi & Marapana, 2019).

370
371 Ripening fruit produces ethylene, and Sherman (1985) suggested that operators of ripening rooms could
372 carefully monitor ethylene production in the rooms and control ripening that way. However, he conceded
373 that this method is generally only useful for home ripening of fruit. Researchers in Nepal (Pokhrel, 2015;
374 and Ruwali et al., 2022) have explored the use of apples and suggested using avocados, pears, or tomatoes
375 as ripening agents. See Evaluation Question #12 for more details.

376
377 **Evaluation Question #4: Specify whether the petitioned substance is categorized as generally recognized as**
378 **safe (GRAS) when used according to FDA's good manufacturing practices (7 CFR 205.600(b)(5)). If not**
379 **categorized as GRAS, describe the regulatory status.**

380 Ethylene is not listed as GRAS, or regulated by FDA. It is considered a pesticide by EPA and exempt from
381 any residue tolerance restriction at 40 CFR 180.1016.

382
383 FDA does include "treating to manipulate ripening" under the definition of "manufacturing / processing"
384 in 21 CFR 117.5: *Current good manufacturing practice, hazard analysis, and risk-based preventive controls for*
385 *human food*. These food safety regulations consider that "treatment to manipulate ripening of raw
386 agricultural commodities (such as by treating produce with ethylene gas), and packaging and labeling the
387 treated raw agricultural commodities, without additional manufacturing/processing, is within the 'farm'
388 definition." This mean that use of on-farm ripening rooms would not cause a farm to be considered a
389 manufacturing facility, as related to FDA food safety rules.

390
391 **Evaluation Question #5: Describe whether the primary technical function or purpose of the petitioned**
392 **substance is a preservative. If so, provide a detailed description of its mechanism as a preservative (7 CFR**
393 **205.600(b)(4)).**

394 Ethylene is used post-harvest to accelerate ripening. This use is not as a preservative, since it actually
395 shortens the storage life of the produce, as for example in bananas (Ahmad et al., 2001). Ethylene-absorbing
396 sachets are sometimes included in products to remove ethylene and prolong storage life.

397
398 **Evaluation Question #6: Describe whether the petitioned substance will be used primarily to recreate or**
399 **improve flavors, colors, textures, or nutritive values lost in processing (except when required by law) and how**
400 **the substance recreates or improves any of these food/feed characteristics (7 CFR 205.600(b)(4)).**

401 Ethylene gas is applied to a raw agricultural product that is not otherwise processed. It is used to accelerate
402 the ripening process, which improves the color, flavor and texture of produce as would eventually occur
403 naturally during unaided ripening (Abeles, 1992; Kays & Beaudry, 1987). Ethylene used in degreening
404 citrus improves the color of raw unprocessed citrus (Mayuoni et al., 2011).

405
406 **Evaluation Question #7: Describe any effect or potential effect on the nutritional quality of the food or feed**
407 **when the petitioned substance is used (7 CFR 205.600(b)(3)).**

408 After ethylene was identified in the 1920s as the chemical that hastened ripening in many fruits,
409 researchers were concerned over the possibility that its use might cause undesirable effects in nutritional
410 and other quality factors. Kays & Beaudry (1987) reviewed a number of studies conducted on fruit quality
411 and found, in general, that fruits that had been induced to ripen using ethylene were of comparable quality
412 to those at a similar stage of maturity that had ripened naturally. For treatment of ethylene to be effective at
413 accelerating ripening, the crop treated must be physiologically mature, i.e., capable of continuing normal
414 ripening when detached from the plant (Abeles, 1992; Sherman, 1987).

415

416 In a review of methods for inducing banana ripening, the authors found that the use of ethylene or
417 acetylene did not significantly affect the final levels of sugar, starch or the soluble solids content in ripe
418 pulp (Maduwanthi & Marapana, 2019). Authors of another study on sensory evaluations of bananas in
419 relation to flavor, sweetness, astringency and acceptability found significant superiority of bananas ripened
420 at higher temperatures (20°C) and with ethylene treatment over those ripened at lower temperature (14°C)
421 and without ethylene treatment (Ahmad et al., 2001). This study demonstrated that stage of ripeness was
422 the most important factor in banana quality, rather than the ethylene and temperature treatment (Ahmad
423 et al., 2001).

424
425 One study did indicate that naturally ripened bananas contained more aroma compounds, both
426 qualitatively and quantitatively, than those with ripening induced by ethylene (Sonmezdag et al., 2014).
427 The authors of the study observed no major differences in total soluble solids, pH, ash, starch, or
428 concentration of glucose and fructose after ethylene treatment as compared to naturally ripened samples.
429 Sucrose content did decrease significantly and firmness was slightly higher for treated bananas. Based on
430 sensory analysis, non-treated bananas were preferred because of their better fruity aroma and general
431 impression attributes (Sonmezdag et al., 2014). An earlier study found that exogenously applied ethylene
432 caused banana skin to ripen more quickly than the flesh. The authors suggested that at the same peel color
433 rating, a naturally ripened banana would be riper than an ethylene-treated banana (Scriven et al., 1989).
434

435 Several studies examining the postharvest application of ethephon⁵ on mangos indicated it increased total
436 aroma volatiles, including monoterpenes, sesquiterpenes, aldehydes, esters, and tetradecane in
437 'Kensington Pride' mangos (Lalel et al., 2003; Singh, 2011).
438

439 A study on the quality of citrus fruit when treated with ethylene for degreening demonstrated that there
440 was no effect on flavor perception, vitamin C content, total phenols and flavonoids, or antioxidant activity
441 of citrus juice. The authors concluded that ethylene is probably not involved in the internal ripening
442 process in citrus, a non-climacteric fruit, and does not affect fruit quality (Mayuoni et al., 2011).
443

444 **Evaluation Question #8: List any reported residues of heavy metals or other contaminants in excess of FDA**
445 **tolerances that are present or have been reported in the petitioned substance (7 CFR 205.600(b)(5)).**

446 Ethylene is not considered a food ingredient, and is not regulated by FDA (see *Approved Legal Uses of the*
447 *Substance*, above). It is exempt from residue tolerances established by EPA when used as a postharvest
448 plant growth regulator on food crops.
449

450 The purity of ethylene is normally greater than 99.9 % by weight; quality is adjusted to meet specific
451 requirements (IARC, 1994). Sulfur, oxygen and acetylene can be impurities but are carefully controlled. A
452 survey of ten US manufacturers in 1993 yielded the following specification ranges (mg/kg) for maximal
453 levels of key contaminants in ethylene (IARC, 1994):

- 454 • methane + ethane, 50–2000
- 455 • propylene, 7–200
- 456 • acetylene, 1.4–10
- 457 • hydrogen, 0.1–10
- 458 • carbon monoxide, 0.15–10
- 459 • carbon dioxide, 2.2–50
- 460 • oxygen, 0.6–10
- 461 • sulfur, 1–10
- 462 • water, 0.6–20

463
464 Ethylene gas sold as banana gas includes carbon dioxide as a second ingredient (NPIRS, 2022).
465

⁵ Ethephon is an ethylene releasing compound with the chemical name (2-chloroethyl)phosphonic acid; also known by the trade name "Ethrel."

466 **Evaluation Question #9: Discuss and summarize findings on whether the manufacture and use of the**
467 **petitioned substance may be harmful to the environment or biodiversity (7 U.S.C. § 6517 (c) (1) (A) (i) and 7**
468 **U.S.C. § 6517 (c) (2) (A) (i)).**

469 *Contamination from manufacturing*

470 The cracking of naphtha or of ethane to manufacture ethylene is highly energy-intensive (Ghanta et al.,
471 2014; Zimmerman & Waltz, 2011). The energy expended during the extraction and ocean-based
472 transportation of fossil fuel sources (crude oil and natural gas) contributes significantly to adverse
473 environmental impacts such as greenhouse gas emissions, acidification, and eco-toxicity (air and water). A
474 life-cycle assessment comparing environmental impacts for thermal and steam cracking of hydrocarbons to
475 dehydration of bioethanol from corn or biomass found similar requirements for energy and overall impact
476 on the environment. The fuel burning to produce energy at power plants was deemed by far the biggest
477 contributor to the various adverse environmental impacts for all methods (Ghanta et al., 2014).

478
479 Zimmerman & Waltz (2011) note that the manufacture of ethylene does produce “significant” amounts of
480 carbon dioxide, and notes that this may be a factor in development of alternative technologies for
481 production of ethylene. Zhao et al. (2018) looked at the production life cycle for ethylene and state that the
482 chemical industry, which is highly energy-dependent, is responsible for 16% of direct global CO₂
483 emissions. Ethylene, as one of the most important chemicals in use, consumes 30% of the total energy of the
484 chemical industry. This study found that China reduced CO₂ emissions by 29.4% per ton of ethylene
485 produced from 2000-2016 due to improvements in technology, and evaluated various methods for future
486 increased reductions (Zhao et al., 2018).

487
488 Petroleum refineries are a major source of hazardous and toxic air pollutants such as benzene, toluene,
489 ethylbenzene, and xylene (EPA, 2003). They are also a major source of other air pollutants: particulate
490 matter, nitrogen oxides, carbon monoxide, hydrogen sulfide, and sulfur dioxide. Refineries also release
491 natural gas (methane) and other light volatile fuels and oils. Some of the chemicals released are known or
492 suspected cancer-causing agents, responsible for developmental and reproductive problems. Refineries are
493 also potential major contributors to ground water and surface water contamination. Some refineries use
494 deep-injection wells to dispose of wastewater generated inside the plants, and some of these wastes end up
495 in aquifers and groundwater (EPA, 2003).

496
497 *Contamination through use*

498 When synthetic ethylene gas is used in postharvest handling, it is applied in closed rooms or containers
499 which are then vented to the atmosphere. Since ethylene is a gas at environmental temperatures, this is the
500 primary route of exposure to the environment. Health Canada considered environmental modelling
501 studies and found that ethylene released to the air will remain in the air, and that only negligible amounts
502 will partition to soil, water and sediment (HealthCan, 2016).

503
504 According to the U.S. EPA Toxic Release Inventory (EPA, 2021), in 2021 the total release of ethylene as
505 airborne emissions in the U.S. was 18.2 million pounds. Of that, 17.2 million pounds was emitted by the
506 chemical manufacturing industry, and 0.7 million pounds was from the petroleum industry. It is not
507 known how much ethylene is released in the atmosphere due to ripening and degreening uses. It is no
508 doubt much smaller than the amount estimated to be applied to pineapple crops in the field. The Food and
509 Agriculture Organization of the United Nations estimates that in 2021, there were 1,046,712 hectares of
510 pineapples grown worldwide (FAO, 2022). If every hectare in the world was treated with 800 grams of
511 ethylene (unlikely, as the harvest takes 12-18 months from flower induction), that would result in
512 application of 837,369 kg (1,846,082 pounds) totally.

513
514 *Ecotoxicity*

515 The Health Canada screening review (HealthCan, 2016) found no effects data on invertebrates or birds,
516 which are most likely to be exposed to ethylene. Ethylene is not expected to be released to water and thus
517 no water exposure is expected. Health Canada did not find adequate empirical toxicity studies on aquatic
518 species. Health Canada’s review of mammalian studies also found that the concentrations of ethylene
519 tested to determine adverse levels in rats are considerably higher than concentrations expected in the
520 Canadian environment.

521
522 Health Canada noted that terrestrial plants are highly sensitive to ethylene in air, and considered that was
523 the primary risk for environmental concerns. They performed a risk quotient analysis based on industrial
524 monitoring dates for four years, and found on average one occurrence per year that had potential to be
525 harmful to plants. The agency concluded that there is little risk of harm to the environment or to organisms
526 since the substance is not present in quantities or concentrations that could cause long term harmful effects
527 on the environment or biodiversity (HealthCan, 2016).
528

529 **Evaluation Question #10: Describe and summarize any reported effects upon human health from use of the**
530 **petitioned substance (7 U.S.C. § 6517(c)(1)(A)(i), 7 U.S.C. § 6517(c)(2)(A)(i) and 7 U.S.C. § 6518(m)(4)).**

531 The main safety concern in relation to ethylene use has been due to the explosive nature of the gas in the
532 air. This is of primary concern in design and operation of ethylene treatment facilities. The EPA, local fire
533 marshal rules, and insurance companies all have very specific labelling and registration requirements for
534 the ethylene itself and the process used to apply it, down to the electrical wiring and piping used in
535 ripening rooms (Sherman, 1985). The gas is explosive in air at concentrations from 3.1% to 32% (31,000 to
536 320,000 ppm). The minimum explosive concentration (3.1%) exceeds the suggested ethylene concentrations
537 for tomato ripening and citrus degreening respectively by 200 and 6,200 times (Sherman, 1985). The
538 "banana gas" (cylinders with 6% ethylene content) and catalytic generator sources of ethylene are
539 considered the safest because they are more easily monitored, but explosive accidents have happened in
540 the past, and operators should be well trained and prepared (Sherman, 1985).
541

542 Ethylene is highly flammable and explosive. Overexposure causes headache, drowsiness, and muscular
543 weakness (NOAA, n.d.). High concentrations of ethylene (>1000 ppm) can cause dizziness or light-
544 headedness. For several decades in the 1900s, ethylene was used as a general anesthetic (Chang, 2016; EPA,
545 1992).
546

547 Ethylene is classified as a simple asphyxiant and acts primarily to limit oxygen (OSHA, 2018). The U.S.
548 Department of Labor Occupational Safety and Health Administration (OSHA) limits exposure levels in
549 OSHA Construction and Maritime standards. The limiting factor is the available oxygen which shall be at
550 least 19.5% in construction and at least 18% for maritime standards (OSHA, 2018).
551

552 Exposure to 37.5% ethylene for 15 min may result in marked memory disturbances (NCBI, 2022b). Humans
553 exposed to as much as 50% ethylene in air, where the oxygen availability is decreased to 10%, experienced
554 a loss of consciousness. In fatal human intoxication, ethylene affects the respiratory center of the brain and
555 kills by suffocation. In workers chronically exposed, ethylene has been associated with a decrease in
556 maximum arterial pressure, slower pulse, decreased visual-motor response, hearing and smelling loss, and
557 problems with bodily temperature control (NCBI, 2022b).
558

559 Occupational exposure to ethylene may occur through inhalation and dermal contact at workplaces where
560 ethylene is produced or used. Monitoring data indicate that the general population may be exposed to
561 ethylene via inhalation of ambient air and smoking cigarettes (NCBI, 2022a; NCBI, 2022).
562

563 According to the National Institutes of Health Hazardous Substance Database, there is inadequate
564 evidence in humans for the carcinogenicity of ethylene, and it is "not classifiable as a human carcinogen"
565 (NCBI, 2022b).
566

567 Based on *in vivo* and *in vitro* studies, ethylene does not induce gene mutations (HealthCan, 2016). Using
568 rats as a model organism, these studies show that ethylene is not carcinogenic when inhaled over a two
569 year period. In addition, epidemiology studies do not show evidence of cancer in exposed workers,
570 although these studies are limited. For other non-cancer health effects, the "lowest-observed-adverse-effect
571 concentration" (LOAEC) for inhalation exposure in rats is 11,500 mg/m³ (10,000 ppm) based on slight nasal
572 effects observed in rats in a 13-week inhalation study (HealthCan, 2016).
573

574 Health Canada compared the upper bounds of estimates of exposure from ethylene in indoor and outdoor
575 locations⁶ to the critical effects levels observed in the literature and concluded that ethylene does not enter
576 the environment in enough quantity or concentration to be of concern for human health (HealthCan, 2016).
577

578 **Evaluation Question #11: Describe any alternative practices that would make the use of the petitioned**
579 **substance unnecessary (7 U.S.C. § 6518(m)(6)).**

580 An alternative to using ethylene for post-harvest ripening is to let the fruit ripen naturally. This can be
581 done for local markets where fruit is picked closer to full ripeness and time to market is short.
582

583 Researchers have found that low-moderate temperatures (6-15 °C) as the fruit is maturing on the tree
584 promotes peel degreening (Manero et al., 2012). Mitalo et al. (2020) investigated the relationship between
585 temperature in storage and ethylene application to peel degreening in lemons. They compared lemons
586 treated with ethylene to those kept at storage temperatures ranging from 5 -25°C for up to 42 days.
587 Complete degreening was achieved at 15 °C after 28-42 days in storage. In contrast, the ethylene assisted
588 degreening achieved a full yellow color 8 days after treatment (Mitalo et al., 2020).
589

590 Post-handling recommendations from the University of Florida (Ritenour, 2015) and the University of
591 California (Arpaia, 2015) do not recommend using cold temperatures as a means of degreening. They do
592 discuss limitations of ethylene application, including faster senescence, and problems with decay.
593

594 We did not find any other cultural practices for promoting ripening or degreening in the literature
595 reviewed for this report.
596

597 **Evaluation Question #12: Describe all natural (non-synthetic) substances or products which may be used in**
598 **place of a petitioned substance (7 U.S.C. § 6517(c)(1)(A)(ii)). Provide a list of allowed substances that may be**
599 **used in place of the petitioned substance (7 U.S.C. § 6518(m)(6)).**

600 Smoke from burning plant material would be considered a nonsynthetic substance according to the NOP
601 *Decision Tree for Materials Classification* (NOP, 2016a), as the smoke is produced from combustion of a
602 biological material.
603

604 However, the traditional Sri Lankan pit method described in *Evaluation Question #3* resulted in blackening
605 and over softening of bananas, leading to decreased marketability (Maduwanthi & Marapana, 2019).
606 Smoke was historically used to degreen citrus in the U.S., though usually it came from kerosene stoves (a
607 synthetic source) and caused problems with fire hazards, heat and decay (Chace, 1934; Abeles, 1992).
608

609 A report from Nepal (Pokhrel, 2013) noted that use of calcium carbide is prohibited there, and ethylene
610 canisters are unavailable. The author suggests the use of fully ripened fruit to produce ethylene in storage
611 with unripened fruit at a rate of 1:100 in a closed room. Ruwali et al. (2022) found effective results for
612 banana ripening when a mature apple is placed in a perforated polyethylene bag with a sample size of a
613 dozen green bananas. Pokhrel (2013) noted drawbacks of using fruit as a ripening agent: it can cause over-
614 ripening and decay. Both authors frame their recommendations as being applicable to local vendors and
615 markets. These techniques are likely not practical for large volume export crops.
616

617 **Evaluation Information #13: Provide a list of organic agricultural products that could be alternatives for the**
618 **petitioned substance (7 CFR 205.600(b)(1)).**

619 Fully ripe organic fruit can be used to ripen climacteric tropical fruit, as noted above. No reference to the
620 use of ripe fruit for degreening of citrus was identified in the literature reviewed for this report.
621

622 **Report Authorship**

623 The following individuals were involved in research, data collection, writing, editing, and/or final
624 approval of this report:

- 625 • Emily Brown Rosen, Organic Research Associates

⁶ Testing was done in both urban and rural locations, though not specifically in crop or post-harvest treatment locations.

- 627 • Tina Jensen Augustine, Senior Technical Coordinator, OMRI
628 • Peter O. Bungum, Senior Technical Coordinator, OMRI
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630 • Doug Currier, Technical Director, OMRI
631

632 All individuals are in compliance with Federal Acquisition Regulations (FAR) Subpart 3.11 – Preventing
633 Personal Conflicts of Interest for Contractor Employees Performing Acquisition Functions.
634

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