

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

## Crops

### Identification of Petitioned Substance

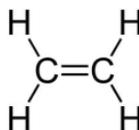
<b>Chemical Names:</b>	14	<b>CAS Numbers:</b>
C <sub>2</sub> H <sub>4</sub> ; acetene; elayl; ethene	15	74-85-1
	16	
<b>Other Names:</b>	17	<b>Other Codes:</b>
bicarburreted hydrogen; ethylene gas; olefiant	18	UN II: 91GW059KN7
gas	19	EPA: PC code 41901
	20	EC number: 200-815-3
<b>Trade Names:</b>	21	
Ethylene; Fruit Ripening Ethylene; Banana		
Gas; Natur-Ripe; Color 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 Crops technical report principally addresses the use of ethylene to regulate pineapple flowering, while the Handling technical report focuses on the post-harvest handling uses of ethylene for tropical fruit ripening and citrus degreening.

### 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 (C<sub>2</sub>H<sub>6</sub>), 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  
62 gas 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 <sup>a</sup>
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.

69

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

70

71 **Specific Uses of the Substance:**

72 Ethylene acts as a plant hormone and is typically associated with fruit ripening (see *Action of the*  
73 *Substance*, below). In some plants, ethylene can also induce plant tips (apical meristems) to develop  
74 flowers (Davies, 2010).

75

76 Crop producers apply ethylene gas in the field to induce flowering in pineapples, as allowed at  
77 §205.601(k) (NOP, 2000). Using specialized equipment mounted to a tractor with a boom, producers inject  
78 ethylene gas (2.25-3.5 kg/ha) into water (7014 L/ha) and activated charcoal. As the ethylene bubbles  
79 through the water, it is partially hydrolyzed and partially adsorbed by the charcoal. After the mixture is  
80 applied via flood nozzles, ethylene slowly releases from the carbon/water mix, where it is then absorbed  
81 by the plants. Two applications are usually made on consecutive nights (NOP, 2000).

82

83 Crop producers and handlers also use ethylene to accelerate the ripening of tropical fruit, and to  
84 “degreen” citrus fruit. This can be done at distribution points or in special ripening rooms on-site at  
85 farms, using either gas cylinders to provide metered amounts of the gas, or catalytic generators to  
86 produce the gas from ethanol. These activities are “post-harvest” uses, covered under the listing at  
87 §205.605(b). These uses are discussed further in the separate 2023 Handling technical report for Ethylene.

88

89 Ethylene products are labeled for ripening a variety of crops, including avocados, kiwis, melons, mangos,  
90 papayas, pears, persimmon, pineapple, stone fruits, tomatoes, and other fruiting vegetables (Livingston,  
91 2005). Ethylene products are also labeled for sprout suppression in stored potatoes (Airgas, 2011), and to  
92 accelerate flue curing of tobacco (Livingston, 2008). An earlier Technical Advisory Panel Review  
93 mentioned use of ethylene to improve the quality of bean sprouts in commercial production (NOP,  
94 1999a). However, no current EPA registrations were found for this use (NPIRS, 2022).

95

96 For non-organic use, ethylene is also permitted for soil injection to control witchweed (*Striga* spp.) in  
97 vegetable and field crops (40 CFR 180.1016).

98  
99 Outside of agriculture, ethylene is used as a precursor chemical in the manufacture of several plastics,  
100 including polyethylene, polystyrene, polyethylene terephthalate, and polyvinyl chloride (Zhao et al.,  
101 2018). Ethylene is also used as an anesthetic, and a refrigerant (Zimmerman & Waltz, 2011).

102

### 103 **Approved Legal Uses of the Substance:**

104

105 *Environmental Protection Agency (EPA)*

106 Ethylene is considered a plant growth regulator (pesticide) and has an exemption from the requirement  
107 of a tolerance for residues at 40 CFR 180.1016:

108

109 §180.1016. Ethylene is exempted from the requirement of a tolerance for residues when:

110 a. For all food commodities, it is used as a plant regulator on plants, seeds, or cuttings and on  
111 all food commodities after harvest and when applied in accordance with good agricultural  
112 practices.

113

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

116

117 *USDA Animal Plant Health and Inspection Service (APHIS)*

118 USDA APHIS has an active program to control witchweed, a parasitic plant that can significantly damage  
119 corn, rice, sorghum, and sugarcane. In 2021, APHIS worked with cooperating farmers to treat 999 acres  
120 out of an estimated 1,600 acres infested. Methods used included tillage, herbicides, hand pulling, and the  
121 use of ethylene gas injection to cause premature seed sprouting (USDA APHIS, 2022; EPA, 1995).

122

123 *United States Food and Drug Administration (FDA)*

124 FDA includes “treating to manipulate ripening” under the definition of “manufacturing /processing” at  
125 21 CFR 117.5 and 21 CFR 112.3. These food safety regulations consider that “treatment to manipulate  
126 ripening of raw agricultural commodities (such as by treating produce with ethylene gas), and packaging  
127 and labeling the treated raw agricultural commodities, without additional manufacturing/ processing, is  
128 within the ‘farm’ definition.” This means that use of on-farm ripening rooms would not cause a farm to  
129 be considered a manufacturing facility, subject to additional regulation under FDA food safety rules.

130

### 131 **Action of the Substance:**

132 Ethylene is a plant growth regulator that is produced naturally by plants and has effects on many aspects  
133 of plant growth, development, and survival, including (Chang, 2016):

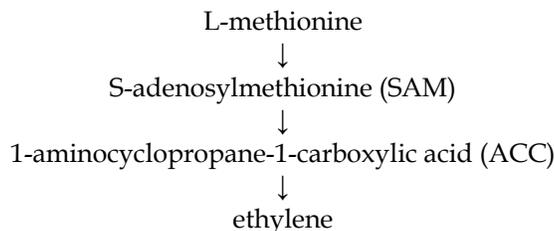
- 134 • seed germination
- 135 • shoot growth
- 136 • root development
- 137 • flowering, sex determination
- 138 • fruit ripening
- 139 • abscission of leaves and fruits
- 140 • senescence of flowers and leaves

141

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

144

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



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

162  
163 In general, ethylene gas is produced in fruit when physiological maturity is reached. In pineapple, the gas  
164 is generated at vegetative maturity of the plant. Application of ethylene has the effect of triggering and  
165 synchronizing the flowering and fruiting cycle to occur sooner than it would naturally (Van de Poel et.al,  
166 2009). In the case of fruit ripening, natural production of ethylene in plant tissue increases rapidly. The  
167 gas triggers the chemical changes (e.g., starch conversion to sugar, cell wall softening) which take place at  
168 ripening. Climacteric fruits are capable of ripening after harvest, and generally show a response to  
169 exogenous ethylene. This causes them to ripen more rapidly and evenly, and also to produce more  
170 ethylene naturally (Maduwanthi & Marapana, 2019).

#### 171 **Combinations of the Substance:**

172 Farmers typically mix ethylene with water when spraying it on pineapple, often adding activated  
173 charcoal (NOP, 2000). Activated charcoal is thought to partially absorb the ethylene and slowly release it  
174 to plants after application. Van de Poel et. al (2009) evaluated different rates of application of activated  
175 carbon in water mixed with ethylene gas and found that only high rates (5% of the solution) were  
176 effective at increasing ethylene absorption. Commercial doses applied at rates of 0.286% (20 kg activated  
177 carbon /7000 L water/ha) had no effect on flower induction. However, Soler et al. (2006) successfully  
178 used a rate of 5% activated carbon in small hand-held units designed to deliver ethylene mixed with  
179 water and handled by a single operator.  
180

181  
182 There are currently five active registrants of agricultural grades of ethylene gas in the U.S., with seven  
183 labeled products. They are labeled with ethylene concentrations ranging from 98.5% to 99.9%, with the  
184 remainder being impurities (NPIRS, 2022; IARC, 1994). One product (Banana Gas 32, Praxair) is labeled  
185 as containing 6.3% ethylene and 93.7% carbon dioxide.  
186

187 <b>Status</b>
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#### 188 **Historic Use:**

189 The NOP added ethylene to the National List as published December 2000 for use to regulate flowering  
190 in pineapple (FR 65 80547). It was also included for post-harvest handling to ripen tropical fruit. In  
191 November of 2003, the NOP made a change to the annotation for the post-harvest allowance to also allow  
192 for degreening of citrus (68 FR 61987). Prior to the USDA regulations, private certifiers and state  
193 programs in the U.S. generally allowed ethylene for use to ripen bananas, and some permitted ripening of  
194 mangos (NOP, 1999b). A petition to modify the handling annotation to permit use for ripening pears was  
195 received by NOP in 2008, but the National Organic Standards Board (NOSB) voted to reject this use in  
196 November 2008.  
197  
198

199 Early uses of natural ethylene included the gashing (wounding) of figs in the Middle East to promote  
200 fruit growth and ripening, and the use of weights to encourage bean sprout thickening. Both cases  
201 resulted in stress-induced ethylene production by the plants (Abeles, 1992). Farmers have long used  
202 smoke or off-gassing from ripe fruit to hasten fruit ripening before ethylene was recognized as the active  
203 agent. Pineapple growers accidentally discovered in 1874 that smoke in greenhouses in the Azores caused  
204 pineapple flowers to develop (Collins, 1960; Rainha, 2013). In the 1920s, growers in Puerto Rico used  
205 smudge fires beneath muslin cloth covering pineapple. By 1932, researchers found that the active  
206 ingredient in smoke was ethylene (Bartholomew et al., 2003). According to Bartholomew (2014), over the  
207 next decades the Hawaiian pineapple industry investigated many different compounds and growth  
208 regulators to induce flowering but found that the effectiveness was related to the fact that these  
209 compounds were precursors or stimulators of ethylene. Researchers also found that  
210 aminoethoxyvinylglycine (AVG), an ethylene inhibitor, prevented flower induction.

211  
212 The pineapple plant is a unique crop in that flowering can be induced by external application of the plant  
213 growth regulator, ethylene. Pineapple is grown in tropical and subtropical countries, and the time from  
214 planting to harvest can range from 12 months in tropical regions to almost 30 months in the cooler  
215 subtropics. "Forcing" of pineapple flowering (causing pineapple plants to flower all at once in a  
216 predictable time period) using ethylene has become an important agronomic practice to ensure uniform  
217 flowering and thus time of ripening and reduce production costs. It is especially important for  
218 synchronizing varieties grown for the fresh market (Chang, 2011; Van de Poel et al., 2009), and it is now  
219 common to force pineapple crops in all months of the year. In the subtropical regions, the natural  
220 induction of flowering can be caused by cooler winter temperatures, which can interfere with timing of  
221 forcing and lead to yield losses, potentially producing a glut of fruit in the summer and lack of fruit in the  
222 fall (Bartholomew, 2014). Hawaii was slow to adopt the use of ethylene in the 1950s because the industry  
223 there relied on natural flower induction to provide a broad harvest period in the summer that was  
224 compatible with harvest labor availability from students on summer break. Hawaii was primarily  
225 growing the 'Smooth Cayenne' variety for canning at that time, which had better quality when harvested  
226 in the summer (Bartholomew, 2014).

227  
228 The use of artificial flower induction led to the development of the fresh fruit export market, with the  
229 ability for year-round production (Bartholomew, 2014; Chang, 2011). The popular MD-2 "Gold" variety  
230 produces high quality fruit year-round but is sensitive to natural flower induction (can flower naturally  
231 and interfere with timing of ethylene induced flowering). This is especially a problem when grown in  
232 cooler subtropical regions, and the control of natural induction has become a highly researched issue.  
233 Natural flower induction interferes with the forcing process by spreading out the harvest period, and  
234 results in fruit that are too small or too few in number to be worth harvesting (Li, 2022; Bartholomew,  
235 2014; Bartholomew, 2018; Reinhardt, 2019).

### 236 237 **Organic Foods Production Act, USDA National Organic Program regulation:**

238  
239 *Organic Foods Production Act of 1990*  
240 Ethylene is not specifically mentioned in the Organic Foods Production Act. It is not specifically  
241 mentioned as an allowed class of materials at 7 U.S.C. 6517(c)(1)(B). However, it could be considered a  
242 "production aid," which is a permitted class.

#### 243 244 *USDA Organic Regulations*

245 Ethylene is approved for organic crop use:  
246 7 CFR 205.601(k) as plant growth regulators. (1) Ethylene gas - for regulation of pineapple  
247 flowering.

248  
249 Ethylene is also approved for organic handling use:  
250 7 CFR 205.605(b) Ethylene - allowed for postharvest ripening of tropical fruit and degreening of  
251 citrus.

252

253 **International**

254  
255 *Canada, Canadian General Standards Board – CAN/CGSB-32.311-2020 Organic Production Systems Permitted*  
256 *Substances Lists*

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

260  
261 The PSL states at Table 8.3 - Post-harvest substances:  
262 "Ethylene: For post-harvest ripening of tropical fruit and degreening of citrus and to control  
263 sprouting of potatoes post-harvest in holding bins."

264  
265 *CODEX Alimentarius Commission – Guidelines for the Production, Processing, Labelling and Marketing of*  
266 *Organically Produced Foods (GL 32-1999)*  
267 Codex guidelines do not mention the use of ethylene, and it is not included in Annex 2 as a permitted  
268 substance (Codex, 2007).

269  
270 *European Economic Community (EEC) Council Regulation – EC No. 834/2007, 889/2008, 2018/848 and*  
271 *2021/1165*

272 Ethylene is permitted as listed in Annex 2, Pesticides – plant protection products.  
273 "Ethylene: Degreening bananas, kiwis and kakis; Degreening of citrus fruit only as part of a  
274 strategy for the prevention of fruit fly damage in citrus; Flower induction of pineapple; sprouting  
275 inhibition in potatoes and onions" (EEC, 2008).

276  
277 The most current EU organic standards, 2018/848, which became enforceable in January 2022, permit  
278 ethylene under 2021/1165 Annex I, "Active substances contained in plant protection products authorised  
279 for use in organic production as referred to in point (a) of Article 24(1) of Regulation (EU) 2018/848:"  
280 "Only on bananas and potatoes; however, it may also be used on citrus as part of a strategy for  
281 the prevention of fruit fly damage."

282  
283 *Japan Agricultural Standard (JAS) for Organic Production*

284 The JAS standards (JAS, 2017) list ethylene in Appended Table 5, as:  
285 "Ethylene, Limited to those used for ripening bananas, kiwifruits and avocados after harvest."

286  
287 *IFOAM – Organics International*

288 Ethylene is listed as approved in Appendix 4 – Table 1: List of approved additives and processing/post-  
289 harvest handling aids.  
290 "Ethylene: De-greening of citrus and ripening." (IFOAM, 2018)

291  
292 **Evaluation Questions for Substances to be used in Organic Crop or Livestock Production**

293  
294 **Evaluation Question #1: Indicate which category in OFPA that the substance falls under: (A) Does the**  
295 **substance contain an active ingredient in any of the following categories: copper and sulfur**  
296 **compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions,**  
297 **treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids**  
298 **including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment**  
299 **cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of**  
300 **toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. 6517(c)(1)(B)(ii))? Is the synthetic substance an**  
301 **inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per**  
302 **40 CFR part 180?**

303 Ethylene is used in crop production as a plant growth regulator, which is not an explicitly listed category  
304 in OFPA. It could be considered a crop production aid. Ethylene does not appear on 2004 EPA List 4 but  
305 does appear at 40 CFR 180.1016 as a material exempt from the requirement of a tolerance for residues.  
306 EPA allows it for use without limits on all food commodities as a plant growth regulator on plants, seeds,

307 or cuttings. It is also permitted without limits on all food commodities after harvest, when applied in  
308 accordance with good agricultural practices. It also is specifically allowed for soil injection on certain  
309 crops to cause premature germination of witchweed seeds (EPA, 1999).

310  
311 **Evaluation Question #2: Describe the most prevalent processes used to manufacture or formulate the**  
312 **petitioned substance. Further, describe any chemical change that may occur during manufacture or**  
313 **formulation of the petitioned substance when this substance is extracted from naturally occurring**  
314 **plant, animal, or mineral sources (7 U.S.C. 6502(21)).**

315  
316 *Thermal cracking*

317 Ethylene is the petrochemical produced in the largest quantities worldwide (IARC, 1994). In 2014, world  
318 ethylene production was 134 million (metric) tons (Lazonby, 2017). As of 1994, over 95% of worldwide  
319 annual production is based on thermal “cracking” of petroleum hydrocarbons with steam (IARC, 1994).  
320 These fractions are obtained from drilling (or hydrofracturing) of oil or natural gas. Thermal cracking  
321 (sometimes referred to as pyrolysis) is a chemical process by which long chain hydrocarbons with higher  
322 molecular masses are converted to short chain hydrocarbons of lower molecular mass.

323  
324 Various feedstocks, including ethane, propane, butane, naphtha, and gas oil are used to produce  
325 ethylene, depending on availability, price, and products desired (Lazonby, 2017). Naphtha is the  
326 principal raw material used in western Europe and Japan, accounting for over 80% of the ethylene  
327 produced. Ethane is the primary feedstock in the U.S., followed by propane, naphtha, gas oil, and butane  
328 (Zimmerman & Waltz, 2011).

329  
330 In thermal cracking the feedstock gases (ethane, propane or butane) or the liquids (naphtha or gas oil) are  
331 preheated and vaporized and are mixed with steam and heated to 1050-1150 K (777-877 °C) in a tubular  
332 reactor. The high temperature and pressure cause the long chain hydrocarbon to be converted to low  
333 relative molecular mass alkenes plus by-products (Lazonby, 2014).

334  
335 World use of ethylene (134 million tons, 2014) (Lazonby, 2017)

- 336 • 60% - polyethylene
- 337 • 16% - ethylene oxide
- 338 • 11% dichloro-1,2-ethane (precursor to PVC, polyvinyl chloride)
- 339 • 5% - ethylbenzene (precursor to polystyrene)

340  
341 A “relatively small” amount of industrially produced ethylene gas is used for agriculture and controlled  
342 ripening (IARC, 1994). No estimate was found of the actual amount used in agriculture or post-harvest  
343 ripening per year.

344  
345 *Catalytic cracking*

346 Catalytic cracking uses a catalyst, typically a zeolite, which adsorbs the long-chain hydrocarbon  
347 feedstocks and removes hydrogen atoms.<sup>1</sup> This causes the long chains to split into shorter chain  
348 molecules with double bonds, which are useful to the petrochemical industry. The feedstock is gas oil,  
349 which is vaporized, passed through a fine zeolite powder, and heated to 700-800 K (427 - 527 °C) in a  
350 reactor. The products behave like a fluid and continuously flow out of the furnace with the cracking  
351 products. The temperature, residence time, and the catalyst determine the product proportions (Lazonby,  
352 2014).

353  
354 *Dehydration of ethanol*

355 Dehydration of ethanol is another commercial route to ethylene (IARC, 1994; Zimmerman & Waltz, 2011;  
356 Fan 2013). In the catalytic dehydration of ethanol to form ethylene, an acid catalyst first protonates the  
357 hydroxyl group, which leaves as a water molecule. The conjugate base of the catalyst then deprotonates  
358 the methyl group, and the hydrocarbon rearranges into ethylene (Fan, 2013). This method is not used

---

<sup>1</sup> Zeolites are hydrated aluminum silicate compounds that may occur naturally as minerals but may also be produced synthetically.

359 commonly to produce large volumes of ethylene as it is endothermic with a high optimal reaction  
360 temperature (180-500 °C), which makes the ethylene expensive to produce. Dehydration of bioethanol is  
361 occurring in Brazil and India and holds promise for producing ethylene from non-fossil fuel sources  
362 (bioethanol from sugar cane or cellulose). At present the output is relatively limited, and used for further  
363 production of polyethylene (Fan, 2013; Lazonby, 2017; Schill, 2010).

364  
365 *Catalytic generators*

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

371  
372 **Evaluation Question #3: Discuss whether the petitioned substance is formulated or manufactured by a**  
373 **chemical process or created by naturally occurring biological processes (7 U.S.C. 6502(21)).**

374 As described in *Evaluation Question #2*, the principal source of commercial ethylene is from thermal or  
375 catalytic cracking of hydrocarbon feedstocks such as natural gas or crude oil. During this process, chemical  
376 bonds within the hydrocarbon molecules are broken, and a different chemical substance is produced.

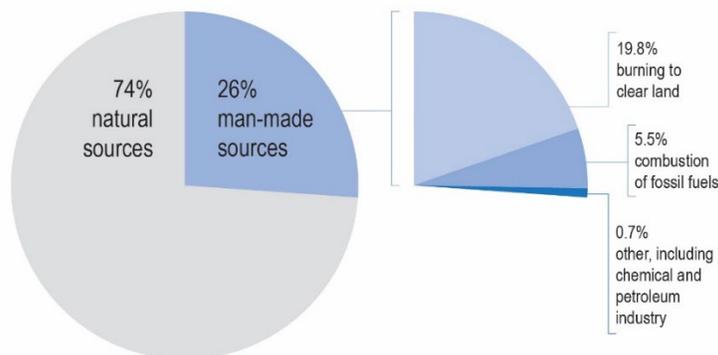
377  
378 Catalytic cracking uses a catalyst, typically a zeolite, which absorbs the long-chain hydrocarbon feedstocks  
379 by removing hydrogen atoms and causes the long chains to split into shorter chain molecules with double  
380 bonds (Lazonby, 2014). Small catalytic generators dehydrate ethanol by a similar process (Kays & Beaudry,  
381 1987).

382  
383 All of these methods involve reactions that produce a chemically changed substance (ethylene) from either  
384 petroleum feedstocks, or from dehydration of ethanol mediated by catalysts. Thus, all these forms should  
385 be considered synthetic (NOP, 2016a) and from nonagricultural sources (NOP, 2016b).

386  
387 **Evaluation Question #4: Describe the persistence or concentration of the petitioned substance and/or**  
388 **its by-products in the environment (7 U.S.C. 6518(m)(2)).**

389 Ethylene is ubiquitous in the environment, arising from both natural and man-made sources. Major  
390 sources are natural emissions from vegetation; as a product of burning vegetation, agricultural wastes  
391 and refuse, and the incomplete combustion of fossil fuels; and from releases during the production and  
392 use of ethylene (IARC, 1994).

393  
394 Total annual emission of ethylene from the global surface was estimated in 1994 to be 18-45 million  
395 (metric) tons per year (19.9 - 49.6 million U.S. tons), of which approximately 74% is released from natural  
396 sources and 26% from anthropogenic sources (see **Figure 2**, below; IARC, 1994). Burning of biomass to  
397 clear land for agriculture or other uses is believed to be the largest anthropogenic source of ethylene  
398 emissions (77%); the combustion of various fossil fuels also accounts for a significant fraction (21%) of  
399 anthropogenic emissions (IARC, 1994). No newer data on global emissions were identified in the  
400 literature review for this report.



401  
402 **Figure 2: Estimated tons of global surface emissions of ethylene in 1995 (IARC, 1994).**

403  
404 According to the U.S. EPA Toxic Release Inventory, in 2021 the total release of ethylene in air emissions in  
405 the United States was 18.2 million pounds (9,100 tons) (EPA, 2021). Of that, 17.2 million pounds was  
406 emitted by the chemical manufacturing industry, and less than 1 million was from the petroleum  
407 industry. For comparison, this is only a small fraction of the amount of ethylene released globally in 1994  
408 (18-45 million tons). The International Agency for Research on Cancer of the World Health Organization  
409 (IARC) monograph cites 1993 data from EPA showing that airborne emissions at that time in the U.S.  
410 were at the level of 38.4 million pounds. Health Canada (2016) also noted that emissions from  
411 manufacturing have decreased by half from 2000-2009, due to recycling and improved technology.  
412 Emissions from combustion engines have also dropped substantially in that time frame.

413  
414 The half-life of ethylene is 1-28 days in water, 1.01 days in air, and 1-28 days in soil (HealthCan, 2016).  
415 Ethylene is readily oxidized in the atmosphere with a theoretical global residence time in the troposphere  
416 ranging from two to four days. There are also numerous chemical reactions associated with the  
417 breakdown of ethylene that may decrease its half-life to just a few hours (HealthCan, 2016).

418  
419 When released to air, ethylene exists solely as a gas in the atmosphere (HealthCan, 2016). Gas-phase  
420 ethylene degrades in the atmosphere by reaction with photochemically-produced hydroxyl radicals. The  
421 half-life for this reaction in air is around two days. Ethylene will also be degraded in the atmosphere by  
422 reaction with ozone and nitrate radicals; the half-lives of these reactions are 6.5 and 190 days respectively.  
423 Ethylene is not susceptible to direct photolysis by sunlight (NCBI, 2022b HSDB).

424  
425 Ethylene reacts in air primarily with hydroxyl radicals (OH•) but it can also react with nitrate ions (NO<sub>3</sub>)  
426 and ozone (O<sub>3</sub>). The oxidation of ethylene can generate nitrogen dioxide (NO<sub>2</sub>) which can later form  
427 ozone (HealthCan, 2016).

428  
429 Ethylene reacts with ozone in the atmosphere to form water, carbon dioxide, carbon monoxide and -  
430 formaldehyde. This reaction reduces ozone levels in the atmosphere (Abeles, 1992). Reaction of ethylene  
431 with oxygen produces carbon monoxide, ethane, propylene, acetaldehyde, propanal, butanal, hydrogen,  
432 and ethylene oxide (Abeles, 1992).

433  
434 When released to soil, ethylene is likely to be highly mobile, based upon its estimated soil adsorption  
435 coefficient (Koc of 13) (NCBI, 2022b).<sup>2</sup> Volatilization from moist or dry soil surfaces is also an important  
436 fate. If released into water, ethylene is unlikely to adsorb to suspended solids and sediment, based upon  
437 the estimated Koc. Using model data, researchers estimated that the half-life of ethylene due to  
438 volatilization is two hours in rivers and two days in lakes. Hydrolysis is not an important environmental  
439 fate process since this compound lacks functional groups that hydrolyze under environmental conditions  
440 (pH 5 to 9) (NCBI, 2022b).

441  
442 Health Canada reviewed several models for bioaccumulation and bioconcentration and concluded that  
443 ethylene is neither persistent nor bioaccumulative in the environment (HealthCan, 2016). An estimated  
444 bioconcentration factor of 2.6 suggests the potential for ethylene to bioconcentrate in aquatic organisms is  
445 low (NCBI, 2022b). The U.S. EPA last reviewed ethylene in 1992 and stated that since it is naturally  
446 occurring and “has a nontoxic mode of action” that it has been classified as a biochemical. EPA waived  
447 ecological effects studies for both indoor use and outdoor use on crops, citing the classification as a  
448 biochemical, use patterns, and low application rates on pineapple (EPA, 1992).

449  
450 **Evaluation Question #5: Describe the toxicity and mode of action of the substance and of its**  
451 **breakdown products and any contaminants.**

452 Human health effects are discussed under *Evaluation Question #10*.

453

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<sup>2</sup> Koc measures the mobility of a substance in the soil, adjusted for carbon content. A high number (over 4.5) means the substance is strongly adsorbed onto the soil and organic matter (ChemSafety, 2022).

454 The Health Canada review (2016) found that ethylene has no effects on invertebrates or birds, which are  
455 the animals most likely to be exposed to the substance. Health Canada did not expect that ethylene would  
456 be released to water but did not find adequate empirical toxicity studies on aquatic species. Health  
457 Canada's review of mammalian studies also found that the concentrations of ethylene tested to determine  
458 adverse levels in rats are considerably higher than concentrations expected in the Canadian environment  
459 (HealthCan, 2016).

460  
461 Ethylene has been known to damage plants when they are exposed to gas leaks or combustion engine  
462 exhaust (Abeles, 1992). Health Canada noted that terrestrial plants are highly sensitive to ethylene in air  
463 and considered that was the primary risk for environmental concerns. They performed a risk quotient  
464 analysis based on industrial monitoring for four years and found on average one occurrence per year that  
465 had potential to be harmful to plants. The agency concluded that there is little risk of harm to the  
466 environment or to organisms since the substance is not present in quantities or concentrations that could  
467 cause long term harmful effects on the environment or biodiversity (HealthCan, 2016).

468  
469 **Evaluation Question #6: Describe any environmental contamination that could result from the**  
470 **petitioned substance's manufacture, use, misuse, or disposal (7 U.S.C. 6518(m)(3)).**

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

480  
481 Zimmerman & Waltz (2011) note that the manufacture of ethylene does produce "significant" amounts of  
482 carbon dioxide and note that this may be a factor in the development of alternative technologies for  
483 production of ethylene. Zhao et al. (2018) looked at the production life cycle for ethylene and state that  
484 the chemical industry, which is highly energy-dependent, is responsible for 16% of direct global CO<sub>2</sub>  
485 emissions. Ethylene, as one of the most important chemicals in use, consumes 30% of the total energy of  
486 the chemical industry. This study found that while China reduced CO<sub>2</sub> emissions by 29.4% per ton of  
487 ethylene produced from 2000-2016 due to improvements in technology, carbon dioxide emissions due to  
488 ethylene production continue to increase overall due to increased demand (Zhao et al., 2018).

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

498  
499 When synthetic ethylene gas is used on agricultural crops, any excess will volatilize in the air. Since  
500 ethylene is a gas at environmental temperatures, this is the primary route of exposure to the environment.  
501 Health Canada considered environmental modelling studies and found that ethylene released to the air  
502 will remain in the air, and that only negligible amounts will partition to soil, water and sediment  
503 (HealthCan, 2016).

504

505 **Evaluation Question #7: Describe any known chemical interactions between the petitioned substance**  
506 **and other substances used in organic crop or livestock production or handling. Describe any**  
507 **environmental or human health effects from these chemical interactions (7 U.S.C. 6518(m)(1)).**

508 Ethylene used in crop production is in gas form and is a synthetic analog of the natural ethylene  
509 produced by plants. The U.S. EPA considers that outdoor use for soil injection (witchweed control) and  
510 pineapple sprays will result in negligible exposure to aquatic and terrestrial organisms (EPA RED, 1992).

511  
512 Ethylene should not be mixed with ozone, peroxides, other oxidizing agents, or with strong acids, which  
513 could cause explosive reactions (NJDOH, 2003; NOAA, n.d.).

514  
515 **Evaluation Question #8: Describe any effects of the petitioned substance on biological or chemical**  
516 **interactions in the agro-ecosystem, including physiological effects on soil organisms (including the**  
517 **salt index and solubility of the soil), crops, and livestock (7 U.S.C. 6518(m)(5)).**

518 Ethylene applied to crops will volatilize if not absorbed by the plant, and so the contribution to soil levels  
519 will be minimal. Ethylene in the atmosphere has an estimated half-life of two days (NCBI, 2022b). Natural  
520 soil ethylene levels are often higher than those in the air, and often associated with waterlogged soils  
521 (Abeles, 1992). Ethylene is readily metabolized by soil organisms, particularly by *Mycobacterium*  
522 *paraffinicum*, which is reportedly efficient enough to remove ethylene from soils (Abeles, 1992).

523  
524 Health Canada (2016) reviewed studies on ethylene impact on crop plants and found that air  
525 concentrations between 5.6 and 12 µg/m<sup>3</sup> had both positive and negative effects on various plant species.  
526 Some cereals, such as barley and oats, appear to be highly sensitive to ethylene at air concentrations as  
527 low as 34.4 µg/m<sup>3</sup>, showing a 63% reduced seed production. Tomatoes show slight curling of leaves at  
528 11.45 µg/m<sup>3</sup>, and peas show a reduction in the elongation of the epicotyl during germination at this  
529 concentration, while canola has increased seed production at 12µg/m<sup>3</sup> (HealthCan, 2016).

530  
531 **Evaluation Question #9: Discuss and summarize findings on whether the use of the petitioned**  
532 **substance may be harmful to the environment (7 U.S.C. 6517(c)(1)(A)(i) and 7 U.S.C. 6517(c)(2)(A)(i)).**

533 Ethylene is a natural substance emitted by plants. When synthetic ethylene gas is applied in water to  
534 plants, it will be absorbed by the plant or volatilize as a gas. As a plant growth regulator, it is used in very  
535 small amounts: generally, 800 g per hectare (0.71 lbs. per acre) applied in 6-8000 liters of water  
536 (Bartholomew, 2003). The Food and Agriculture Organization of the United Nations estimates that in  
537 2021, there were 1,046,712 hectares of pineapples grown worldwide (FAO, 2022). If every hectare in the  
538 world was treated with 800 grams of ethylene (unlikely, as the harvest takes 12-18 months from flower  
539 induction), that would result in application of 837,369 kg (1,846,082 pounds) totally.

540  
541 For comparison, according to the U.S. EPA Toxic Release Inventory, the total release of ethylene as  
542 airborne emissions in the U.S. was 18.2 million pounds in 2021. Of that, 17.2 million pounds were emitted  
543 by the chemical manufacturing industry, and 0.7 million pounds were from the petroleum industry.

544  
545 Effects on mammals, invertebrates, birds, and plants are discussed under *Evaluation Question #5*.

546  
547 **Evaluation Question #10: Describe and summarize any reported effects upon human health from use**  
548 **of the 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)).**

549 The main safety concern in relation to ethylene use has been due to the explosive nature of the gas in the  
550 air. This is of primary concern in design and operation of ethylene treatment facilities. The EPA, local fire  
551 marshal rules, and insurance companies all have very specific labelling and registration requirements for  
552 the ethylene itself and the process used to apply it, down to the electrical wiring and piping used in  
553 ripening rooms (Sherman, 1985). The gas is explosive in air at concentrations from 3.1% to 32% (31,000 to  
554 320,000 ppm). The minimum explosive concentration (3.1%) exceeds the suggested ethylene  
555 concentrations for tomato ripening and citrus degreening respectively by 200 and 6,200 times (Sherman,  
556 1985). The "banana gas" (cylinders with 6% ethylene content) and catalytic generator sources of ethylene  
557 are considered the safest because they are more easily monitored, but explosive accidents have happened  
558 in the past, and operators should be well trained and prepared (Sherman, 1985).

559

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

564  
565 Ethylene is classified as a simple asphyxiant and acts primarily to limit oxygen (OSHA, 2018). The U.S.  
566 Department of Labor Occupational Safety and Health Administration (OSHA) limits exposure levels in  
567 OSHA Construction and Maritime standards. The limiting factor is the available oxygen which shall be at  
568 least 19.5% in construction and at least 18% for maritime standards (OSHA, 2018).

569  
570 Exposure to 37.5% ethylene for 15 min may result in marked memory disturbances (NCBI, 2022b).  
571 Humans exposed to as much as 50% ethylene in air, where the oxygen availability is decreased to 10%,  
572 experienced a loss of consciousness. In fatal human intoxication, ethylene affects the respiratory center of  
573 the brain and kills by suffocation. In workers chronically exposed, ethylene has been associated with a  
574 decrease in maximum arterial pressure, slower pulse, decreased visual-motor response, hearing and  
575 smelling loss, and problems with bodily temperature control (NCBI, 2022b).

576  
577 Occupational exposure to ethylene may occur through inhalation and dermal contact at workplaces  
578 where ethylene is produced or used. Monitoring data indicate that the general population may be  
579 exposed to ethylene via inhalation of ambient air and smoking cigarettes (NCBI, 2022a; NCBI, 2022).

580  
581 According to the National Institutes of Health Hazardous Substance Database, there is inadequate  
582 evidence in humans for the carcinogenicity of ethylene, and it is “not classifiable as a human carcinogen”  
583 (NCBI, 2022b).

584  
585 Based on *in vivo* and *in vitro* studies, ethylene does not induce gene mutations (HealthCan, 2016). Using  
586 rats as a model organism, these studies show that ethylene is not carcinogenic when inhaled over a two-  
587 year period. In addition, epidemiology studies do not show evidence of cancer in exposed workers,  
588 although these studies are limited. For other non-cancer health effects, the “lowest-observed-adverse-  
589 effect concentration” (LOAEC) for inhalation exposure in rats is 11,500 mg/m<sup>3</sup> (10,000 ppm) based on  
590 slight nasal effects observed in rats in a 13-week inhalation study (HealthCan, 2016).

591  
592 Health Canada compared the upper bounds of estimates of exposure from ethylene in indoor and  
593 outdoor locations<sup>3</sup> to the critical effects levels observed in the literature and concluded that ethylene does  
594 not enter the environment in enough quantity or concentration to be of concern for human health  
595 (HealthCan, 2016).

596  
597 **Evaluation Question #11: Describe all natural (non-synthetic) substances or products which may be**  
598 **used in place of a petitioned substance (7 U.S.C. 6517(c)(1)(A)(ii)). Provide a list of allowed substances**  
599 **that may be used in place of the petitioned substance (7 U.S.C. 6518(m)(6)).**

600 Pineapple growers discovered by accident in the Azores in 1874 that greenhouse plants could be forced  
601 into flower with smoke, and growers adopted the practice as a way to schedule fruiting when prices were  
602 high (Bartholomew, 2014). In the Azores as of 2013, pineapple was still grown in greenhouses and forced  
603 with smoke from burning of dried vegetation and wood chips. The carbon materials are placed in metal  
604 cans and burned for several hours in the evening, then vented the next day for a period of 9-21 days. This  
605 appears to be a very limited-volume, high-value specialty product, exported mainly to Portugal for the  
606 winter holidays. Reportedly, 40% of the crop is certified organic. Production has declined from a peak in  
607 the 1930s due to development pressure and competition from lower-cost production methods in Costa  
608 Rica, Brazil, Africa, and the Philippines (Rainha et al., 2013). The production practices are regulated by  
609 the EU Technical Committee on Certification and Control for Azorean pineapple as a Protected  
610 Designation of Origin product (Bartholomew, 2014).

611

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<sup>3</sup> Testing was done in both urban and rural locations, though not specifically in crop or post-harvest treatment locations.

612 Once it was discovered that ethylene was responsible for the flower induction effects of smoke in the  
613 1930s, the burning of wood or other carbon sources was not used for outdoors commercial pineapple  
614 production (Bartholomew, 2014). It is likely impractical for use on larger scale outdoor operations and  
615 would contribute to air pollution via release of particulates and carbon dioxide to the atmosphere.

616  
617 **Evaluation Question #12: Describe any alternative practices that would make the use of the petitioned**  
618 **substance unnecessary (7 U.S.C. 6518(m)(6)).**

619 The 2011 limited scope technical report discussed research done in Taiwan (Maruthasalam et al., 2010) to  
620 test use of chilled water or ice as a treatment for flower induction. Subsequent research has shown  
621 inconsistent results using these techniques (Chang et al., 2011). The researchers hypothesized that the  
622 chilling technique only works when night temperatures are cooler than 20 °C for 2-3 days before  
623 treatment, as well as for the duration of the treatments (ice cold water applied three or four times at 24-  
624 hour intervals). Soler et al. (2018) noted a report of trials in Costa Rica of chilled ice water or ice that did  
625 not give consistent results.

626  
627 Pineapples can be grown without the use of artificial flower induction. However, relying on natural  
628 flower induction would drastically reduce the ability of tropical and subtropical producers to export  
629 marketable quantities of fresh organic fruit to other parts of the world. As noted in the limited scope  
630 technical report for ethylene, (NOP, 2011) the market for organic pineapple in the EU and the U.S. has  
631 increased steadily in the last decades, and some have attributed the growth in large part to the approval  
632 of ethylene for flowering in 2002 in the U.S. and 2005 in the EU (NOP, 2011; Pay, 2009).

633  
634 A search to confirm if plant breeders have developed varieties that produce pineapples more consistently  
635 with natural flowering was conducted as part of this report. However, we found no literature on  
636 breeding pineapple for consistent natural flowering. Instead, there is a large effort to breed for  
637 *insensitivity* to natural flower induction, so that the plants will respond uniformly to ethylene applications  
638 (Li, 2022; Young, 2016).

639  
640 Researchers in Benin looked at various methods to improve pineapple quality in order to increase the  
641 export market to Europe (Fassinou Hotegni, 2015). They compared systems that did not use artificial  
642 flower induction with those that did. Although they found that natural flower induction resulted in  
643 higher fruit weight and a greater percent that met the quality grade for export, it came at a “huge cost.”  
644 This was due to a very long time from planting to flowering and harvest, the need for multiple harvests,  
645 and a low proportion of plants producing fruit. The study concluded that it would be better for growers  
646 to focus on cultural methods such as improved planting stock and use of organic manures and other  
647 fertilizers during the vegetative stage and manage the timing of flowering and fruiting with application  
648 of ethylene or related compounds (Fassinou Hotegni, 2015).

649  
650 No other literature was found that explored alternative cultural practices to the use of ethylene in  
651 pineapple production.

652

653

#### Report Authorship

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

656

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

665

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