

# Public Comment Summary

---

Comments submitted before October 1.

## Crops Subcommittee

### Magnesium Oxide

Support listing: 0

Oppose listing: 8

Major concerns cited:

- Environmental pollution in production.
- “Because we believe the NOP policy violates the statute, and will therefore not subject magnesium oxide to the required assessment to determine re-listing at sunset in the future, we sincerely urge NOSB members to oppose this petition and any others where removal or annotation might conceivably be needed for health, environmental, and essentiality issues until we reinstate the sunset process of OFPA.”

### Aquaculture Materials

73 consumers and 2 organizations (Beyond Pesticides, No Spray Zone) oppose approving any materials until aquaculture regulations are in place.

### Streptomycin

Oppose: 279 consumers; 5 farmers; 7 health care professionals; 2 organizations (Beyond Pesticides, No Spray Zone); 10 directly affected by allergies, compromised immune systems, MRSA, and health problems

Support extension: 5 (Granatstein; CCOF; Organic Trade Association; Alberts Organics/UNFI)

Support new listing with different annotation: 1 (Organic Tree Fruit Association)

Neutral: 2 (Westbridge, Organic Produce Wholesalers Association)

Those opposing the extension cite evidence that residues of streptomycin are in and on apples; that the genes for resistance to streptomycin in fire blight can be carried on plasmids and are the same as those causing resistance in human pathogens; that all use of antibiotics increases antibiotic resistance.

Those supporting the extension say that alternatives are not fully developed and that the research on strep does not indicate evidence of transfer of antibiotic resistance to human pathogens. CCOF is concerned about organic pear growers. In addition, OTA says that expiration dates need to be based on research based timelines, not political compromise.

The Organic Tree Fruit Association proposes to allow the current rule to expire as scheduled in 2014; develop a new rule that will sunset in 2019 that allows use of materials post infection; in

2019 transition to an even more restrictive rule that allows the use of antibiotics in emergency situations. They say that no discussion of antibiotics can ignore:

- There is currently no viable alternative to antibiotic use. Preliminary research of Blossom Protect indicates it does not work in Michigan's growing conditions.
- Blight resistant rootstocks and tolerant cultivars, are not a viable solution in commercial scale orchards as the rootstock are not widely available, do not confer resistance to the fruiting portion of the tree, do not apply for all regions of the US, and farmers would have to replace their crops, which is not economically feasible.
- Dismiss objections that antibiotics will enter into the food system because the literature does not support that. Rather it is more linked to overuse in animal and medical systems.

The Organic Produce Wholesalers Coalition- "We believe that NOSB should not take away production tools before development of viable, workable alternatives, less we risk crippling important segments of the organic industry which can take years to rebuild."

Westbridge believes that Blossom Protect was unfairly and undeservingly singled out for negative comments on its efficacy." They believe that comments on the failure of Blossom Protect in the Pacific Northwest and California are incorrect and misleading, as numerous trials show them performing on par with, or better than strep.

Other comments of interest:

- John Glenn Morris of Gainesville, FL wrote as a physician, epidemiologist, and specialist in infectious diseases to stress the importance of streptomycin in medicine, particularly for drug-resistant TB. "Based on available data (as well as outlined in the petitioned material checklist), there is some degree of risk that continued use of streptomycin, as proposed in the petition, will result in further development of streptomycin resistance in the immediate orchard environment, with, in turn, the potential for further spread within the environment and ultimate transfer to humans....I concur with the data and arguments presented in favor of denying the petition, and add my own strong opposition to the proposal to further delay the existing expiration date for streptomycin."
- CCOF: "While our clients do not all use this material... the infrequent times when the material is needed have not yet been replaced with alternative measures. It takes five to seven years to bring an organic orchard to maturity, making it economically devastating for farmers to lose and orchard to disease. We strongly support the removal of

streptomycin from organic agriculture, but want to see it done in a way that minimizes disruption to the fruit industry.”

- Cindy Norwitz, Certified Organic Processor and Grower who has never used antibiotics: Consumers outrage is one major reason to stop its use.
- Steven Seuser of Washington DC opposes the use of antibiotics in organic. He is allergic to penicillin and “I have fewer options of antibiotics in the rare circumstances I need to take them. But when I'm required to take them, I need a high level of assurance that the antibiotics my doctor prescribes will effectively kill the the bacteria that are affecting me.”
- Catherine Waltham-Sajdak of Centerville, VA is the parent of an immune compromised child “whose life absolutely depends on the efficacy of antibiotics when she needs them. I was horrified to learn that antibiotics used in human medical treatment are used in the production of ANY crop, let alone an organic one. Whether there is an alternative or not, I'd prefer a marred apple or pear over the preventable death of a person because of antibiotic resistance and inappropriate use of antibiotics in the environment. As an environmental soil chemist, I see this as a real and immediate threat to human health and safety, a detriment to environmental health, and an unacceptable risk for minimal societal benefit.
- Teri Searcy of Redwood City (9/24) has been a nurse for over 25 years “I have seen the decline in the effectiveness of antibiotics, the desperation to find new and more effective alternatives, which also cost us all a lot of money on drug research.” She opposes the use of antibiotics on crops.
- Claudette Sirois of Fredericton, NB, Canada (9/24) is allergic to antibiotics and opposes the use of antibiotics.
- Frances Podein of Jacksonville, FL (9/30) opposes the use of antibiotics has he had a bad reaction to tetracycline which made his tongue swell for five hours and now does not take antibiotics at all.
- Susan Watts of Riverside, CA (10/1) is the parent of a child with a compromised immune system that is concerned about antibiotic resistant bacteria. She opposes the use of antibiotics.

### **Aqueous Potassium Silicate Sunset**

Oppose: 6 consumers, 1 organization (Beyond Pesticides)

Support: 1 CCOF

Those opposing the relisting of aqueous potassium silicate (APS) say that the NOSB has found it not to satisfy the criteria of essentiality and compatibility with organic production. There are potential adverse impacts that have not been evaluated by the NOSB. The subcommittee must recommend against relisting in order for the full board to consider it.

CCOF does not have new information about APS, but supports the new sunset procedure. “In the absence of compelling reasons presented by the community regarding the material’s suitability criteria, we see no reason to remove it from the National List.”

### **Sodium Carbonate Peroxyhydrate Sunset**

Oppose: 9 consumers, 1 medical doctor, 1 organization (Beyond Pesticides)

Support: 1 organization (CCOF)

Those opposing the relisting of sodium carbonate peroxyhydrate (SCP) say it has been found by the NOSB not to meet the OFPA criteria of essentiality, compatibility with organic production, and no impacts on human health and the environment. It was added to the National List as an alternative to copper sulfate in rice, but there is no evidence that it has been adopted or is effective for that use. The pesticide is also toxic to birds, bees, and beneficial insects. The subcommittee must recommend against relisting in order for the full board to consider it.

CCOF does not have new information about SCP, but supports the new sunset procedure. “In the absence of compelling reasons presented by the community regarding the material’s suitability criteria, we see no reason to remove it from the National List.”

### **Sulfurous Acid Sunset**

Oppose: 8 consumers, 1 organization (Beyond Pesticides)

Support: 1 organization (CCOF)

Those opposing the relisting of sulfurous acid cite potential adverse impacts that have not been evaluated by the NOSB. The subcommittee must recommend against relisting in order for the full board to consider it.

CCOF says, “In the case of sulfurous acid, we know that this material has significant use providing economic value on a variety of farms we work with. It has supported the development of organic berry and crop production in a number of regions. In the absence of compelling reasons presented by the community regarding the material’s suitability criteria, we see no reason to remove it from the National List.”