

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2648-So, Ag Stop 0268
Washington, DC 20250-0268

March 18, 2013

Docket: AMS-NOP-12-0070

RE: Crops Subcommittee Petitioned Material Proposal– Oxytetracycline

Dear Ms. Arsenault:

Thank you for this opportunity to comment on the Crops Subcommittee Petitioned Material Proposal – Oxytetracycline.

I support the Organic Trade Associations comments on this matter.

This entire situation with antibiotics use in apples and pears on organic orchards is an opportunity for a great victory of organic agriculture if it is given the chance to play out fully.

As a result of the Organic industry, cooperating with the NOP and USDA research, it appears that we are on the verge of providing a solution to this specific fire blight problem that does not involve antibiotics.

However the very promising research program will not be ready for use by organic farmers (AND conventional farmers) until 2017. To terminate this program earlier than that jeopardizes the entire program, and specifically the organic stature of the current farmers fighting this problem – their entire orchards are at risk at this moment if they cant use this treatment. Their only choice is to lose their orchards, or become conventional farmers.

Give those pioneering farmers and researchers the time they need to bring this to a successful organic conclusion, please extend this until 2017.

Ms. Arsenault, thank you, the NOP, and all the Board members for your consideration of these comments and for your continuing work to further Organic Agriculture and Organic Foods.

Sincerely,

John K. Ashby

General Manager – Ingredients
California Natural Products