



TRIPLE B CORPORATION

FRESH PRODUCE DELIVERED DAILY

4103 2nd Avenue South Seattle, WA 98134 (206) 625-1412

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

Docket: AMS-NOP-12-0070

RE: Crops Subcommittee – Tetracycline

Dear Ms. Arsenault:

Charlie's Produce thanks you for this opportunity to provide comment on the Crops Subcommittee proposal on Tetracycline. The Subcommittee proposes to remove the existing expiration date of October 21, 2014, for oxytetracycline and replace that with a new expiration date of October 21, 2016. This would be for use in both apples and pears for control of fire blight.

Charlie's Produce is the largest independent wholesale produce company in the Northwest. We provide organic and conventional produce to retail and food service customers throughout Oregon, Washington, Montana, Idaho and Alaska. Purchasing and selling organic apples and pears is a significant part of our business. We paid over a million dollars in purchases of organic apples and pears in 2012. This was a significant part of our total purchases of organic produce.

Not only is the apple and pear industry important to us for our sales, but is an important part of the economy of Washington State. As you know, fire blight can pose a serious threat to organic orchardists. If left un-controlled, it will destroy whole trees and a whole orchard. Tetracycline is the only control that is currently available to Orchardists for fire blight. Researchers around the country have been working hard to find organic methods to control it and they are approximately 4 years away from finding a solution.

Tetracycline is used only as needed, sometimes a little as every 4 years. It is sprayed at bloom and dissipates quickly into the environment, so the chance of it ending up in an apple or pear is very remote. While we do not want to have antibiotics used in the growing of organic tree fruit, we support giving the researcher's time to find an alternative. Consumers don't have the correct about this issue. They are being told that the antibiotic is in the apple, but there is no evidence to support this. Because fire blight can quickly destroy an orchard, without the use of Tetracycline, many growers would go back to growing conventionally. If this were to happen the amount of organic fruit available would be seriously limited. Without the use of this product, until a suitable alternative can be found

We appreciate the NOSB crop committee's recommendation of extending allowing the use of Tetracycline until 2016, but would ask for another year, 2017. This will give the researchers the opportunity to finish their research and get the information about the new methods out to the growing community. Please extend the use of Tetracycline in organic tree fruit production until 2017.

Thank for this opportunity to comment.

Sincerely,

Diane Dempster,

Organic Specialist