



ORGANIC PRODUCE WHOLESALERS COALITION

March 19, 2013

National Organic Standards Board

Crops Subcommittee Petitioned Material Proposal on Oxytetracycline

The Organic Produce Wholesalers Coalition (OPWC) is comprised of 10 businesses that distribute fresh, organic produce to retail stores, restaurants, and other customers located across the United States and internationally. Many of our businesses were early participants in the organic community and we have continued to play an active role in shaping the infrastructure of the organic industry. Our combined annual sales in 2011 were \$453,338,078, and in 2012 exceeded \$550,000,000.

NOSB Crops Subcommittee Recommendation

OPWC does not support the majority recommendation of the NOSB Crops Subcommittee recommendation for use of oxytetracycline in apples and pears for the control of fire blight for the following reasons:

1. The Committee recommendation does not clearly acknowledge the serious human and environmental impacts of any antibiotics use, including the comparatively small use by organic apple and pear producers. These impacts are widely and are accurately documented in the minority opinion.
2. The recommendation does not state an absolute expiration date, with a clear Board commitment to deny any further petitions for extension of use.
3. There is no annotation accompanying the recommendation to mandate that producers demonstrate and document numerous activities and use of alternative materials in order to move toward organic production systems that do not use synthetic antibiotics.
4. The Committee's recommendation does not address additional guidance about oversight through the certification and accreditation systems, a point that we think must be emphasized in order provide reassurance to consumers that the NOP's organic pest control hierarchy is being

implemented with the highest possible rigor during the remaining period in which antibiotics may be used

A Significant Decision

In 2011 we conducted a survey of our members; collectively the OPWC purchased approximately \$39,148,938 of organic apples and pears. Of that total, \$26,952,112 was of varieties of fruit that are thought to be susceptible to fire blight¹. This means that about 66% of total organic apple purchases, and 79% of total organic pear purchases, would likely be affected by changes to NOP's regulation of antibiotics.

In accordance with organic principles, we support a phase out of the use of antibiotics in organic fruit tree production. That said, we firmly acknowledge that organic growers need field-tested, commercially available, reliable methods for controlling fire blight because the disease can be so devastating. Practical and reliable methods for fire blight control are critically important in retaining these orchards in organic production.

In order to protect consumer confidence in the organic brand, we believe that there needs to be a clear acknowledgement of the health and environmental impacts of *any* antibiotics use, together with a commitment to an absolute expiration date, and short- term allowance for use *only* when it has been documented by growers that all other management practices have been exhausted.

Support for the “Centrist Proposal” Discussion Document

In the last 6 months, individual members of OPWC supported the work of the National Organic Coalition (NOC) to craft a proposal that would take into account the needs and concerns of the entire organic community (i.e. farmers, advocacy groups, scientists and consumers). The Centrist Proposal (*see attached addendum*) recognizes concerns about the seriousness of this issue, and proposes what we believe to be a workable solution that addresses farmers' need for more time to learn about and implement alternative practices and materials, while addressing the concerns of those who purchase organic fruit about the allowance of antibiotics in organic production.

OPWC unanimously supports the proposal² for:

- Short, limited use, extension
- A concise annotation detailing the specific disease management hierarchy that must be followed

¹ Specifically, Apples: Fuji, Gala, Granny Smith, and Pink Lady, and Pears: Bartlett, D'Anjou, Comice, and Bosc.

² Discussion Draft Version 5, dated January 11, 2013.

- A annotation detailing how oversight from certifiers and the NOP will be carried out

Individual OPWC members vary in their opinions on the rationale of a sunset date, but all believe it should be within the 2016 or 2017 timeframe.

The Organic Produce Wholesalers Coalition appreciates the opportunity to comment on the recommendations of the NOSB. Please feel free to contact us if you would like any additional information on the points raised in these comments.

Respectfully Submitted,

Natalie Reitman-White

Coordinator, Organic Produce Wholesalers Coalition

Organic Produce Wholesalers Coalition Members:

- ◆ Albert's Organics, Bridgeport, NJ
- ◆ Charlie's Produce, Seattle, WA
- ◆ Co-op Partners Warehouse, St Paul, MN
- ◆ Earl's Organic Produce, San Francisco, CA
- ◆ Eastern Carolina Organics, Durham, NC
- ◆ Global Organic Specialty Source, Sarasota, FL
- ◆ Goodness Greenness, Chicago, IL
- ◆ Heath & Lejeune, Los Angeles, CA
- ◆ Organically Grown Company, Portland, Oregon
- ◆ Veritable Vegetable, San Francisco, CA