



Promoting Health Through Organic Agriculture As A Leading Sustainable Organization

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National Organic Program USDA–AMS–NOP
1400 Independence Ave. SW.
Room 2646—So.
Ag Stop 0268
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Founded over 30 years ago, Organically Grown Company (OGC) is the largest distributor of organic fruits and vegetables in the Pacific Northwest. Our business is owned by regional farmers and employees. Currently, OGC works with more than 500 grower/vendors and serves over 250 natural and fine food stores and restaurants located throughout western Oregon and Washington, as well as retail and wholesale accounts in other western states and Canada.

Petitioned Material Proposal on Oxytetracycline

A Significant Decision

Last year, OGC purchased approximately 2.2 million pounds of organic apples and 450,000 pounds of organic pears of varieties that are thought to be susceptible to fire blight¹ this represents 49% of our total apple purchases, and 47% of total organic pear purchases.

We understand the threat posed to growers of these varieties by fire blight as well as the argument concerning why use of antibiotics in tree fruit production is inconsistent with the principles of organic agriculture. As a result, we support a phase out of the use of antibiotics in organic fruit tree production to provide organic orchardists the time to test and adopt alternative fire blight controls that are proven to be reliable in the field, and commercially available. 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, OGC worked with 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 pushing towards a definitive phase out of antibiotics in organic production.

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

OGC wholeheartedly supports the proposal² for:

- Short, limited use, extension with an expiration date of 2016
- A concise annotation detailing the specific disease management hierarchy that must be followed
- An annotation detailing how oversight from certifiers and the NOP will be carried out

NOSB Crops Subcommittee Recommendation

As such, OGC does not support the majority recommendation of the NOSB Crops Subcommittee recommendation concerning 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

GMOs and Seed Purity

OGC agrees with the subcommittee that preventing contamination of organic crops by genetically engineered (GE) organisms is important to maintaining organic integrity. We also agree about the importance of GE-free seeds as a basic requirement for organic production. It is a tremendous challenge to maintain high quality organic seeds free from GE contamination while not burdening organic growers, who are the victims of contamination of their seed stock. Current methods of regulating GMOs result in the organic food industry carrying an unfair burden to prevent contamination across the supply chain, which in turn, places organic producers and all businesses that purchase, handle, process and sell organic products under constant threat of market and livelihood losses. We agree with Organic Seeds Alliance (OSA) that before any decisions can be made regarding seed purity, the organic community needs a comprehensive data set for understanding the state of GE contamination in at-risk organic and non-GE seed. Such data is critical to creating appropriate guidance and/or regulatory changes, including timelines for any changes. This data is also important for understanding the impacts any decisions may have on farmers and their access to seed appropriate for organic systems.

Organically Grown Company appreciates your consideration of our comments.

Natalie Reitman-White
Director of Sustainability & Trade Advocacy
Organically Grown Company

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