



The Washington State Association of Organic and Sustainable Agricultural Producers

March 18, 2013

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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:

I am writing on behalf of Tilth Producers of Washington. We are a state wide association of organic and sustainable growers, researchers and agricultural businesses. Our growers represent a wide diversity of crops, regions and scale and are located throughout the state. The Cascade Mountain range creates low rainfall across the eastern two-thirds of the state, creating some of the better growing regions in the world for tree fruit. The issue of managing fire blight in tree fruit production is critically important in all the tree fruit growing regions of the US, (the Pacific Northwest, California, Virginia, Michigan, New England-see related University Extension publications).

Tilth Producers is writing in support of a timetable that supports the growers and ultimately consumers who want both safe, healthy food as well as a sustainable farming system for our state's growers. We are writing in support of the Crops Subcommittee recommendations to grant the extension for fire blight management tools, including antibiotics, through the 2016 growing season. We also support the original end date of 2017 as was proposed in the original process defined by the Materials Review Process.

Critical issues that should be considered in this decision.

1. Industry united:
 - a. With industry-wide support for a complete phase-out of the current fire blight tools, no sector is urging the continued use of antibiotics after 2017.
 - b. The organic sector has long used far less antibiotics than conventional fruit production systems precisely because prevention practices are used more widely.



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2. Delay in initiating critical research:
 - a. As late as 2010, at least two studies involving alternatives to antibiotics were not funded by OREI, illustrating the critical disconnect between NOSB identified material review priorities and those research institutions created to address critical production problems.
 - b. Dr. Ken Johnson at OSU has been researching fire blight management strategies for over 20 years. He has just finished the first year of a three year grant that will provide critical information to guide the use of alternative products to control fire blight. Additional time must be allowed for current fire blight tools while this and other research can be completed and tested.
3. Complex nature of solving this problem:
 - a. Outbreaks of fire blight occur sporadically and are dependent on specific environmental conditions that must be closely and individually monitored to anticipate high risk time periods.
 - b. Once the disease is established in the wood, no sprays are effective and the wood - tree or branch - must be removed. Small lesions are extremely difficult to identify and often go undetected, but are in place to infect the trees the following season.
 - c. Outbreaks in the local vicinity can contribute to infections in previously disease-free areas.
4. Devastating consequences:
 - a. Under the right environmental conditions, infections can kill blocks of trees within very short time periods.
 - b. This disease is prevalent in all major tree-fruit growing regions of the US.
 - c. This disease is currently not present in South America or New Zealand.
 - d. Should currently certified growers have critical tools removed prematurely, the supply of organic tree fruit will be replaced by growers outside the US. This will have major impacts to farming communities here in the US and especially in Washington State.
 - e. There is further concern for the loss of organic tree fruit acreage, affecting the industry overall, as noted by OGC in their comment on this issue: "In a 2012 organic grower survey, 93% of growers



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said they would reduce organic apple or pear production or exit it entirely (return to conventional farming) with the loss of antibiotics without proven consistent alternatives because of the high potential to lose *entire orchards* to fire blight.”

5. Especially devastating impacts to pears and younger orchards:
 - a. Those orchards that have trees on rootstock older than 20 years have a distinct advantage with increased resistance to fire blight. Transitioning orchards into organic production and into desirable varieties has resulted in significantly reduced applications of the broad array of pesticides onto orchard lands.
 - b. Pears varieties require 10 to 12 years from planting before they begin producing fruit, and with increased susceptibility in young orchards these growers have both high risk of disease and a long wait time for their return on investment.
6. Over-simplification of issues to consumers:
 - a. The original language of the Organic Foods Production Act specifically allowed limited and restricted use of antibiotics in livestock and cropping systems. There has been no effort at concealing this use by the farm community. Individual companies in the organic trade engaged in production claims that effectively and immorally demonized the use of antibiotics for specific, limited and restricted use. It is the businesses that are responsible for the failure to educate consumers around critical production challenges.
 - b. Allowed antibiotics are based on naturally occurring compounds.
 - c. A reduced availability of organic apple and pear varieties from the diverse offering currently available to consumers will lead to many consumers to choose conventional tree fruit, or fruit grown outside the USA over limited domestic organic options.
7. Risk to consumers and environment, Reference:
http://www.tfrec.wsu.edu/pages/organic/fire_blight
 - a. Overall, there is no direct evidence that applications of antibiotics to orchards during bloom contribute to antibiotic resistance in human pathogens. Adherence to federal and state regulations minimizes the direct exposure of workers to antibiotics. Human pathogenic bacteria have not been reported as common colonists of flowers, the tissue treated directly with antibiotics. The antibiotics are active on plant tissues for a limited time period, long before harvest. Antibiotic formulations for plant agriculture



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- a. are not contaminated with resistance genes. Finally, naturally-occurring tetracycline-resistant bacteria are minor components of the communities found on apple flowers and leaves and their presence is independent of antibiotic applications. Overall, springtime applications of oxytetracycline on plants are unlikely to impact the development of antibiotic resistant human pathogens.
- b. Studies demonstrate environmental degradation of antibiotics to ineffective levels within 4 days (under cloud cover), 1-2 days under sunny conditions and 2 hours during heavy rain and when sprayed during blossom are negligible at harvest.
- c. Studies provide no evidence that antibiotic sprays that land on the ground exert any influence to microflora either in reducing populations or inducing resistance transfer in the environment.
- d. No direct linkage has been demonstrated between antibiotic resistant bacteria in humans and antibiotic sprays on plants.
- e. Consumers should compare and consider the serious risks posed by using antibacterial soap, hand sanitizers and other products on a routine basis in the home.
- f. The Environmental Protection Agency states that typical, pharmaceutical oxytetracycline exposure to humans would be 50,000 to 200,000 times greater than the dietary exposure from apples or pears.

8. NOP systems in place:

- a. The Materials Review process, aided by the Technical Advisory Panel Review process, was developed with input from all stakeholders to constantly and continuously review materials. We believe that process should have been allowed to do what it was designed to do, namely to evaluate the effectiveness and safety of approved and proposed materials. The use of antibiotics in tree fruit production is an example of an arbitrary NOSB ruling that should not have been made. If the sunset procedure was followed the allowance would have been granted until October 2017, allowing ample time for further research into alternatives. Given the tree fruit industry is already moving in the direction of non-synthetic disease management tools for fire blight the additional time recommended by the Crops Subcommittee is reasonable and necessary.
- b. Tilth Producers does not support the premise that all approved synthetic materials should be removed from the Approved List. Each material should be reviewed and evaluated on its own merits.



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- c. The National Accreditation Plan provides for strict review and oversight of each Certifiers Plan. This level of scrutiny makes it all the way to the fields and offices of producers, who are pushed to constantly improve their systems and prepare for potential problems.
- d. The Organic Farm Plan is the tool developed by the NOSB and NOP to address all of the systems, thinking and planning that goes into the production of crops and livestock. Growers work with their certifiers throughout the growing season to ensure that they are engaging in the best strategies for their farming practices. A tremendous commitment is required of every level of the certification process.

9. Need for additional time: Reference:

http://www.tfrec.wsu.edu/pages/organic/fire_blight

- a. More time is needed to develop recommended treatment programs across the diverse micro-climates across the US and work with growers to implement effective control of this deadly disease. In 2011 OREI did fund the fire blight project of Ken Johnson at Oregon State. His first research season was 2012 funding for 3 more seasons. His work should help develop alternative management and materials to help move growers to successful non antibiotic fire blight control.
- b. Claims that resistant varieties are available are misleading, as resistant rootstocks do not confer protection to the scion or bearing wood.
- c. People do not realize that fire blight does not reach treatable levels every year in every orchard – it is sporadic and dependent on weather during bloom. Growers use disease prediction models to determine when treatment is needed. Fire blight cannot be controlled once an infection has occurred (other than with the chain saw), and thus use of control materials is preventative, not as a last resort. But once in the tree, no sprays on the outside of the tree will affect the bacteria.
- d. A grower survey was conducted by WSU in January 2012 with 94 respondents. In Washington State, 73% said they had tried alternative treatments to manage fire blight but only 33% reported some success with those strategies for managing fire blight outbreaks in their orchards. Questioned as to what actions they would take if antibiotics were removed from their available materials, 44% said they would reduce their acreage of organic apples and 44 % said they would exit organic production.



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- d. Production capacity needs to ramp up and effective management strategies need this two year extension to increase adoption of successful alternatives. 93% supported the petition for filing for the extension of current disease management tools,
- e. If the organic industry loses those growers who still depend on limited use of antibiotics to control fire blight, over night, we lose the tremendous progress that has been made to convert hundreds of acres into organic production. The real impact to the environment from the resumed use of cheaper and more hazardous products to manage all of the other pests and diseases that orchardists face in order to bring their crops to market will result in much higher exposure of insecticides, pesticides and herbicides to farm workers, water resources and wildlife.

At the core of Tilth Producers of Washington's mission is the promotion of ecologically sound and economically viable farming practices that improve the health of our communities and natural environment. We educate growers and support efforts that allow for continued expansion of organic and sustainable agriculture across Washington State. The loss of oxytetracycline in tree fruit production at this critical time when research is being completed and alternatives are not yet widely available poses a grave threat to our region. We do not want to lose organic acreage by forcing farmers to choose between non-organic practices or dead trees. It is our hope that this last extension will provide the opportunity for the research to identify best strategies, and label the best products. We will support the dissemination and training opportunities for tree fruit growers. It is our goal to bring more growers along and reduce the impact to growers committed to alternative management strategies. We ask the NOSB vote to support the Crops Subcommittee proposal of an extension of the use of tetracycline in tree fruit production until October 2016.

Respectfully submitted by

Anne Schwartz
Policy Committee Chair
Tilth Producers of Washington