



Tuesday, March 19, 2013

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:

As an associate of UNFI I want to thank you for the opportunity to provide comment on the Crops Subcommittee proposal on Tetracycline for use in apples and pears to combat fire blight. “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.”

Let me begin by emphasizing that **UNFI is absolutely committed to ending the use of antibiotics in organic apple and pear production.**

UNFI is the leading independent national distributor of natural, organic and specialty foods and related products including nutritional supplements, personal care items and organic produce, in the United States. We have national distribution coverage in all 50 states and Canada. We are the leader in providing organic foods in North America with 7,000 associates, 27,000 customers and 65,000 products. UNFI's distribution operations consists largely of five main units: UNFI Eastern Region, UNFI Western Region, UNFI Canada, Albert's Organics and Select Nutrition

Organic apple sales are a *critical* sales category for Albert's Organics (AO), which focuses on the distribution of produce. Organic apples rank number two in sales only behind organic berries. Organic Northwest apples represent 22% of all fruit sales and are 9.5 % of total produce sales for AO. Last year's sales from Northwest apples alone were almost \$16,000,000 . The year over year growth for Northwest apples was over 21% making this category one of our fastest growing.

Organic apples are not only an important category to us at UNFI, but they are also a source of nutrition,

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great flavor and pride for us, in that we make these apples available to all people across the US and Canada. Additionally organic apples are the source of livelihood for the over 100 organic producers we purchase from in the Northwest. Many of these producers rely entirely on their organic fruit production to support their families. We have known and worked with these producers for over three decades. Put simply, many are like family to us.

Many of our growers have told us that if the tools currently needed to fight fire blight are taken away too early and without viable alternatives they may have no choice but to convert to conventional production. To illustrate the reasoning behind this, a typical apple orchardist has a \$20,000 per acre and a 5 year investment in their orchard. Pears take 10-12 years to start producing after they are planted. In seasons of severe fire blight outbreak the very hard decision will come down to: “Do I lose my entire orchard or do I convert to conventional production and save my investment?” Losing an entire orchard is not a “temporary” setback; rather, it could be devastating on both a personal and an industry level.

Accordingly, if the selected extension date still does not provide enough time for a viable scientific remedy to be developed and the proper tools to be acquired for the grower, the decision is a clear one. This continued flexibility supports our smaller producers and our family farmers who are the real backbone of rural communities and organic producers and who will bear the greatest impact from any premature deadlines. Therefore, we support a 2017 deadline.

In summary:

- **UNFI and Albert’s Organics is committed to ending the use of antibiotics in organic apple and pear production.** We want antibiotics to be phased out of organic production! The question before the NOSB is *when* and at what cost. Researchers and orchardists have committed years of research into developing alternatives to antibiotics for fire blight control. We expect that **by 2017**, recently funded research and field-testing will provide organic growers new tools allowing them to end the use of antibiotics.
- **A 2017 expiration date will support current research and testing and allow for grower education and success.** The most sensible course is to extend for a limited amount of time the ability for growers to use tetracycline as restricted under NOP standards while the new alternative materials are fully tested. Based on the status of emerging alternatives and existing research funded under USDA, the reasonable expiration date that will support product registration and availability, commercial scale-up, and grower experience is 2017.
- **Expiration dates need to be based on research-based timelines, not political compromise.** Expiration dates that are the result of unfounded public fears and compromise will continue to fail. They will continue to put us in the exact situation we’re in now. Decisions from the NOSB must be science-based.

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Additionally, it is unlikely consumers want to see organic farmers watch their trees die and run the risk of setting back the organic fruit industry by decades.

- **UNFI supports the subcommittee resolution.** In accordance with existing organic regulations, the use of tetracycline must *continue* to be highly regulated. As stated in the organic regulations, producers may only apply synthetic materials when physical, biological, and cultural practices and biological or botanical substances are not effective, provided conditions are documented and approved in their organic system plan. We support the resolution but request the new expiration date be further moved to 2017.

Conclusion:

UNFI urges NOSB to recommend an expiration date that can be tied to a fact-based research-supported timeline as we have described in our comments. The reasonable **expiration date** that will support product registration and availability, commercial scale-up, and grower experience is **2017**.

I am thankful to the National Organic Standards Board for the opportunity to comment and for your commitment to furthering organic agriculture.

Respectfully submitted,
Melody L Meyer

VP Policy and Industry Relations
United Natural Foods Inc.