



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

March 18, 2013

Dear Ms. Arsenault,

Thank you for this opportunity to provide comment on the National Organic Standards Board Crops Subcommittee Proposal on tetracycline. The subcommittee is proposing to remove the existing expiration date of October 21, 2014 and replace it with a new expiration date of October 21, 2016. Though we support an eventual phase out of the use of antibiotics in organic fruit tree production, we firmly acknowledge that organic growers need field-tested, commercially available, reliable methods for controlling fire blight because the disease can be so devastating. It is for this reason that we support the Centrist Proposal to address farmers' need for more time to learn about and implement alternative practices and materials. We urge you to extend the expiration date for tetracycline to allow more time for research, product development, and grower experience, with alternatives to proceed.

Veritable Vegetable (VV) is the oldest organic produce distribution company in the country. Founded as an alternative to the conventional food system, VV began distributing organic, fresh fruits and vegetables to neighborhood co-ops and community storefronts in 1974. Since then, VV has grown its business to over \$42 million dollars in sales annually. We have earned a solid reputation for quality, integrity and leadership in the organic industry.

Veritable Vegetable provides full service distribution of the highest quality organic fresh fruits and vegetables to retailers, restaurants, schools, corporate campuses and wholesalers. Located in San Francisco, VV's distribution area covers the entire state of California and includes areas within Arizona, Colorado, Hawaii, Nevada and New Mexico. We strive to maximize profit for small- and mid-sized farmers by ensuring every farmer we work with receives the highest return possible for their product.



Through the years, VV has been an integral part of change in the sustainable food systems movement by increasing demand for fresh, organic fruits and vegetables, developing certification standards, working to pass food and agriculture legislation, helping to unify the produce community, and distributing healthy, fresh foods to communities all over California and beyond.

Clearly, the potential market losses to fire blight are significant; in 2011, VV sold \$2.5 million worth of apples and pears, of which \$1.75 million accounted for varieties listed as particularly susceptible to fire blight. We think that this is a significant portion of our market, and would like to see these organic farmers succeed and thrive in perpetuity. Please extend the expiration date.

Thank you for the opportunity to comment and for your commitment to furthering organic agriculture.

Sincerely,

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Co-Owner and Purchasing Manager

