

March 18, 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:

Thank you for the opportunity to provide comment on the National Organic Standards Board (NOSB) Crops Subcommittee proposal regarding tetracycline. I represent the Washington State Department of Agriculture's Organic Advisory Board (OAB); advisors to our State's Organic Food Program (OFP). The OAB represents stakeholders from all aspects of the organic industry across Washington, including orchardists, producers, processors, handlers, retailers, and consumers. As of February 1, 2013, the WSDA certified 333 producers of organic apples and/or pears, more than 45% of the total numbers of producers it certifies.

The WSDA Organic Advisory Board supports the Crops Subcommittee proposal to remove the existing sunset date for oxytetracycline of October 21, 2014, and replace it with the new expiration date of October 21, 2016, extending the current sunset date for this material used in tree fruit production (for apples and pears).

Along with the rest of the organic industry, the OAB supports a phase-out of antibiotic usage in tree fruit production. We agree with the Crops Subcommittee that as an industry we must commit to and prepare for this phase-out, supporting current and new research for alternatives to oxytetracycline. The proposed two year extension provides continued availability of organic apples and pears while research for alternative controls for fire blight continues.

While not a great deal of time, allowing oxytetracycline use until October 2016 is critical for the advancement of current research efforts. Commitment to phase-out of this product by the organic industry is evident in research support: over \$600,000 in grower-funded research for non-antibiotic, organic compliant controls and practices; plus over \$5 million in research support in the USDA Agricultural Research Service. An extension of oxytetracycline use is an acknowledgment of current research progress and respects both the research industry's need for additional time and the grower's need for uninterrupted controls for potential fire blight outbreaks. New products must be tested in a variety of weather conditions, and because optimal fire blight conditions do not necessarily occur every year, sufficient research time is critical.

There have been some promising results to date, especially with copper and yeast products, but further testing and ultimately EPA review is still needed. OREI research has made considerable progress and work is underway at OSU. The OAB is pleased with the progress made by research currently underway. It is our belief that successful results will come of this work; however, the challenge is the time necessary to test and approve alternatives for use by growers. Time is especially important for research in pear production, as alternatives are not as well advanced for that crop as they are for apples.

As elsewhere, the PNW is challenged by weather activity that creates favorable conditions for fire blight outbreaks. Fire blight doesn't happen every year, but tools are needed for when it does. Given the potential for entire orchard blocks to be lost to this disease, it is reasonable to allow for the extension of current fire blight management tools while research for commercially viable alternatives continue. Under the Organic System Plan, growers may use synthetic disease management tools only when cultural and non-chemical controls are not effective – and only when such synthetic materials are approved for use and documented in a grower's organic system plan. WSDA's Organic Food Program and other accredited certifying agencies must ensure growers are compliant with current organic standards; allowing oxytetracycline when other controls are ineffective provides growers and certifiers with an option to protect an important organic crop. Leaving growers without options during times of severe fire blight outbreak forces them to choose between devastating crop losses or using non-approved materials and losing organic certification.

Tree fruit is a valuable crop in the Pacific Northwest (PNW). Over 15,000 acres of certified organic orchards supply apples and pears to the national and international markets, with PNW growers supplying over 80% of organic apples and pears in the US. The OAB closely follows data on acreage under organic production or in transition, and is concerned that without disease management tools, Washington stands to lose organic acreage and suffer reduced production of organic tree fruit. We are committed to a vibrant organic industry for our State, and while we support the expansion of organic production around the globe, we do not wish to see our growers suffer losses or go out of business. Organic apple and pear production is increasing while conventional production has remained flat. Were fire blight losses in Washington to affect supply, demand would be filled by organic fruit from countries such as Chili, Argentina or New Zealand, where fire blight is not as prevalent.

The OAB wishes to express disagreement with the Crops Subcommittee Proposal's inclusion of a quote by an employee of the WSDA Organic Food Program. This quote was taken out of context. The staff of the OFP are exemplary representatives for WSDA, and their work is always on behalf of the agency. Any quotes should always be credited to the agency, verified and approved before publication.

The OAB also disagrees with the arbitrary decision to extend the use of oxytetracycline in tree fruit production until October 21, 2014, rather than to have followed the five year sunset cycle which would have allowed use of these materials until October 2017. Research is time consuming and must be done across all possible climates and conditions; data must be reviewed; and products must be

registered for use when approved. In the case of fire blight, conditions that promote the disease do not exist every year and so time is needed for researchers to test alternatives under natural conditions. A five year sunset would have complied with internal rules and allowed the tree fruit industry and researchers an uninterrupted period to find alternatives to comply with a phase-out of antibiotics in tree fruit production.

The OAB requests the NOSB support the Crops Subcommittee proposal and allow research for alternatives to progress while oxytetracycline continues to be allowed until October 21, 2016. The loss of oxytetracycline in tree fruit production now, when research is making positive strides, unnecessarily jeopardizes the tree fruit industry and risks potential reduction of domestic fruit while opening up the door to increased apple and pear imports. As a successful fire blight management tool, the continued use of oxytetracycline benefits all organic stakeholders, especially here in Washington State, which produces high volumes of organic tree fruit. We wish to see organic acreage continue to increase in our state, and for a diverse variety mix of tree fruit to continue to be available across the country.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Michele Catalano".

Michele Catalano, Chair
Organic Advisory Board
Washington State Department of Agriculture