



Northeast Organic Farming Association of Vermont

An organization of farmers, gardeners, and consumers working to promote an economically viable and ecologically sound Vermont food system

March 19, 2013

National Organic Standards Board
Ms. Ann Michelle Arsenault, Special Assistant
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

Public Comment
NOSB Meeting-April 2013
Docket: AMS-NOP-12-0070; NOP-12-17
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Vermont Organic Farmers LLC (VOF) is a USDA accredited certifier representing 576 certified organic farmers and processors. The organization has been certifying producers since 1985 and has been accredited by the USDA since 2002.

The Northeast Organic Farming Association of Vermont (NOFA-VT) is one of the oldest organic farming organizations in the country with over 1,300 members – farmers, gardeners and consumers working to promote an economically viable and ecologically sound food system.

We appreciate the opportunity to comment on the NOSB's agenda items.

Crops Subcommittee

Petitioned Material Proposal: Oxytetracycline

We strongly support the crops subcommittee's commitment to phase out the use of antibiotics to treat fire blight in organic apples and pears. We also feel that the NOSB must be resolved not to extend the allowance of this material beyond October 2016. We do however support the continued allowance of this material and suggest the following additional restrictions as a compromise between the two positions of immediate vs. extended phase out.

- 1) Requiring the use of disease models tailored to different regions of the country.
- 2) Reducing antibiotic usage by requiring an "integrated control" defined as the sequencing of a biological control followed by an antibiotic control. Researchers in Oregon achieved control similar to an antibiotic-only regime, but were able to reduce antibiotic use by half. (Granatstein, Nov 2011)



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- 3) New, succulent growth is very susceptible to fire blight. Cultural practices to control fire blight (pruning, proper fertilizing) are more effective in mature orchards. We recommend considering restricting oxytetracycline use to the first 8 growing seasons of an orchard.

In addition, we support the National Organic Coalition's Centrist Discussion Document as a means to increased oversight to ensure that producers are moving away from their reliance on these materials.

GMO Ad-Hoc Subcommittee

Discussion Document: GMOs and Seed Purity

There is strong agreement in the organic community that there is a critical need to address GMO contamination at all levels of organic production and manufacturing – especially in organic and non-GMO seedstocks used in organic production.

We believe that a credible and strict seed purity standard is required to maintain the perceived integrity of the organic label and consumers' trust of certified products. The development and implementation of this standard should be given the highest priority by the NOSB and the NOP.

We were pleased to read the comments of several seed company representatives who stated that the adoption of a strict "none in 3000 seeds" threshold is reasonable and feasible for corn and alfalfa. We look forward to learning more of the experiences, practices and recommendations of commercial seed companies that are successfully working with seed producers to meet strict testing standards for all at-risk crops.

There is a growing interest among farmers in Vermont and elsewhere in breeding and production of grain and oilseed crops to meet expanding local and organic market demand. On these farms there is a heightened risk of "creeping contamination" of seedstocks over successive years. There is a need to determine the extent of contamination on these farms and the long-term effectiveness of practices intended to prevent such contamination.

At present, ACAs do not have standard protocols for sampling and testing seedstocks, nor do they have clear recommendations for implementing and monitoring practices that will reliably decrease contamination levels over time. We request that the NOSB and NOP work to address these needs as soon as possible.

Livestock Committee

Interim Report: Vaccines Made with Excluded Methods (VMWEM) Working Group

We appreciate the subcommittee's thoughtful work on this complex subject. Our one suggestion is to argue for a system of identifying vaccines MWEM that can be, as much as possible, interpreted in the same way by all certifiers and producers. We also support the subcommittee's proposal to revise the definition of excluded methods to specifically include technologies used in vaccine production.