

# CS Comments

---

## Streptomycin

**Total # of Comments: 416**

**Total oppose extension:**

**372 Individual Comments**

**17 Comments from those with health problems, antibiotic allergies or infections causing harm, plus one who “nearly lost our loved one to a septic antibiotic-resistant staph infection”**

**16 Comments from medical health practitioners or professionals**

**8 comments from organizations (CFS, Cornucopia, Consumers Union, IFDSA, NOC, Beyond Pesticides, Food and Water Watch, Organic Consumers Association)**

**+39,851 signatures from OCA petition**

**+12,427 signatures from FWW petition**

**+30,498 signatures from CFS petition**

**Total supporting extension:**

**4 comments from individual producers (California Natural Products, River Bend Orchards, Viva Terra, Tadashi)**

**4 from promotion/certifier groups (California Apple Commission, CCOF, OTA, PCO)**

**Total neutral:**

**2 (OPWC, Westbridge)**

1. **California Apple Commission** supports the extension of streptomycin in organic apple production. “Today, California organic apple growers need all available tools to combat pest and diseases. However, streptomycin, used to treat fire blight in organically grown apples and pears, expires on October 21, 2014. This action eliminates an effective organic fire blight material for California organic apples. Without this product, organic growers will not have a successful means of controlling the disease and may stop planting, if not pulling, organic acreage due to the lack of tools available. An alternative to eliminating this product would be to extend the use of this material until a viable replacement can be registered. In fact, the Commission for the past five-years has invested over \$60,000 in research toward this effort and continues to seek research in an effort to find alternatives, and this does not count what other organizations and states are doing. Until a tested and proven alternative is registered, organic growers must have a viable option to combat fire blight.”
2. **CCOF** supports the extension of streptomycin. “While our clients do not all use this material... the infrequent times when the material is needed have not yet been replaced with alternative measures. It takes five to seven years to bring an organic orchard to maturity, making it economically devastating for farmers to lose an orchard to disease. We strongly support the removal of streptomycin from organic agriculture, but want to see it done in a way that minimizes disruption to the fruit industry.” They also support the call for more research on alternatives.
3. **Center for Food Safety** opposes the extension for use of streptomycin in organic apple and pear production as it does not meet the review criteria required under OFPA for substances to be added to the National List. In fact it never has: in 2011 Crops Subcommittee determined that

strep failed to satisfy all three review criteria, but even so extended its use. This is contradictory policy making that does not bolster consumer confidence in the organic label.

“Streptomycin use in organic orchard should not be extended because it is incompatible with organic systems and because it poses unnecessary threats to human health...The risks of using streptomycin are even clearer than those from using tetracycline....Scientists have shown that the mechanism for streptomycin resistance in fire blight is directly applicable to human pathogens, meaning that the same gene gives both types of bacteria resistance.”

“The use of streptomycin is inconsistent with organic principles and practices, predominantly because it inevitably contributes to incidences of antibiotic resistance in bacterial populations.” Because of gene transfer with other bacteria which enhances the spread of antibiotic resistance “infectious disease experts worldwide have called for an end to any unnecessary uses of antibiotics to retain their effectiveness in treating human diseases.” Aside for human effects it is harmful to soils microbial ecosystems as it is moderately persistent and highly mobile in aerobic soils.

Finally, CFS says that alternative management techniques exist, new ones are entering the market every year with the most effective method being an integrated approach. Orchards in the EU and Canada have already been successful in mitigating fire blight damage without the use of antibiotics. And simply, consumers do not expect antibiotic use in any sector of organic production, especially given the clear and widely marketed prohibition of their use in livestock rearing.”

4. **Cornucopia Institute** rejects the petition to remove the expiration date. “In order to be approved for use in organic production, synthetic materials such as antibiotics must meet three criteria: They must be **essential** for organic production, **compatible** with organic production practices, and cause **no harm** to humans or the environment. We believe that streptomycin fails to meet all these criteria set forth in OFPA.” Particularly they outline that: Streptomycin is not essential for control of fire blight as cultural, biological, and other materials are available to manage fire blight and many orchardists grow apples without antibiotics. Streptomycin is not compatible with organic production practices, such that antibiotics represent an input-substitution mentality. Streptomycin is harmful to humans as it may contribute to the development of antibiotic resistance and it is decreases biodiversity and harms soil ecosystems. Finally, the NOP sunset policy may prevent future reviews by the full Board such that the need to set an expiration date now is necessary.
5. **Consumers Union** rejects the petition to extend the expiration date. “Consumers have come to expect that organic foods are produced without the use of antibiotics. Organic is widely marketed as “no antibiotics,” which has become a consumer expectation. Other segments of the organic market, like organic meat, cheese and milk, have set and met this expectation, and so

have organic fruit growers including nectarine and peach growers. Organic apple and pear trees treated with antibiotics simply do not meet consumer expectations.

In September 2013, the Centers for Disease Control and Prevention released a report that notes that 23,000 human deaths could be attributed to the development of antibiotic resistance from overuse of antibiotics, including in agricultural settings. At Consumers Union, we urge you to prioritize the continued effectiveness of streptomycin to save human lives.”

6. **Beyond Pesticides** “supports the minority position of the Crops Subcommittee in opposition to the petition. The use of streptomycin to control fire blight in apples and pears meets none of the criteria of the Organic Foods Production Act (OFPA). It presents significant adverse impacts to human health and the environment, is incompatible with organic and sustainable agriculture, and is not essential”
7. **Infectious Disease Society of America** opposes the extension of streptomycin. IDSA members are alarmed by the synergistic public health crises posed by increasing morbidity and mortality due to antibiotic-resistant infections across the U.S. accompanied by a dwindling antibiotic research and development pipeline. Bacterial strains such as *P. aeruginosa* are found widely in the environment and have become increasingly resistant to aminoglycosides and other medically important antibiotics, leading to life-threatening infections in hospital settings and even the community...

Streptomycin is an important antibiotic most commonly used to treat pulmonary tuberculosis (TB). It is one of a small number of drugs available to treat TB, and is especially valued for the treatment of multi-drug resistant (MDR) TB. Streptomycin is classified as ‘highly important’ for treating serious human disease both by the World Health Organization (WHO) 6 and in federal guidance...

Therefore, before the USDA moves to support further use of this drug on apples and pears, these questions need to be addressed and a risk assessment model should be developed to understand the potential for adverse health consequences in humans.

8. **National Organic Coalition** supports the minority position to allow streptomycin to expire. NOC notes “that the scientific record regarding streptomycin on apples and pear to be significantly more compelling than that of oxytetracycline (rejected by the board in April 2013).” They do not agree that streptomycin meets all three OFPA criteria: they are harmful to human health and the environment; it is not essential and there are available alternatives; and it is not compatible or consistent with organic systems. “Should the NOSB reject all the arguments above... we caution that expirations can turn (and have turned) into extensions that may not move a material into sunset listing.”
9. **Organic Produce Wholesalers Coalition** which is comprised of 10 businesses with annual sales in 2013 that exceeded \$550M. We are neutral (neither in favor or opposed) on the petition to extend the use of streptomycin. We recognize that there are particular issues associated with streptomycin that are different from tetracycline including the resistance of the fire blight bacterium to streptomycin in the Western U.S., and recorded instances of detectable residues of streptomycin in the fruit and seeds of apple trees treated with this antibiotic. At the same time we know that growers in the Midwest and Eastern U.S. continue to utilize streptomycin as a

critical tool for fighting fire blight in their orchard. As the NOSB considers the use of antibiotics in tree fruit and the future of *other* production materials, we urge the Board to carefully consider the implications of these decisions on farms and the marketplace. We believe that NOSB should not take away production tools before development of viable, workable alternatives, lest we risk crippling important segments of the organic industry which can take years to rebuild.

10. **OTA** supports the extension to 2017. OTA “supports the efforts being made to transition the current practice to an alternative but effective approach—one that does not include antibiotics. We agree that antibiotics should be phased out of organic production, and we support all efforts to develop effective alternatives. OTA respectfully urges NOSB to accept the subcommittee proposal and recommend an expiration date that can be tied to a fact-based research-supported timeline. 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.”
11. **Pennsylvania Certified Organic** supports the majority position to extend the expiration date “because effective natural alternative management tools for fire blight do not currently exist. Furthermore, PCO would support an even longer extension, such as reinstating the sunset process for this material to ensure that enough research and education of alternatives is available to organic apple and pear producers. PCO also supports the resolution ... that commits the organic community to phase out this material.”
12. **Westbridge** takes no position on the extension of Streptomycin for use in combating fire blight. However, Westbridge introduced Blossom Protect for the control of fire blight in the US upon receiving registration in 2012. They stand behind it as “one of the most effective alternatives available.” Additionally “with demonstrated efficacy, organic approval, an pollinator and worker safety, it represents a valuable product to combat fire blight. Supply should be sufficient for future demand, but since it is a living organism, inventories will be predicated upon grower demand.”
13. **Ashby, John is the General Manager of California Natural Products** who supports the extension of streptomycin. “I really hate the indiscriminate use of anti-biotics period, in agriculture especially. Organics has the opportunity to do the world a service by allowing the continuation of this detailed study that also gives Organic crops the chance to stay Organic. But this will takes some time. Please refer to the OTA comments for greater detail on why extending usage until 2017 serves in so many ways the greater good of keeping the trees alive and Organic in the meantime, while learning how to conquer this problem WITHOUT anti-biotics, and how this learning does not JUST benefit organics but benefits conventional agriculture as well, resulting in a reduction in the use of antibiotics that extends way beyond Organic agriculture.
14. **Food and Water Watch** believes the use of all antibiotics in organic production should cease as soon as possible –for both health reasons and to meet the expectations of consumers.
15. **Organic Consumers Association** opposes the extension of the use of streptomycin to help reduce the problem of antibiotic resistance.
16. **Butterfield, Bev of Holdon, MO** “It has become increasingly important for me and my daughter to eat healthy, high quality organic food due to digestive and immune system issues that have recently been diagnosed by our doctor. We are not food snobs who prefer to eat organic. Eating

organic is vital to our health and quality of life.” She opposes strep in organic apple, pear production. Form.

17. **Chinciolo, Steve of River Bend Orchards** supports the extension for streptomycin. He is a farmer with 165 acres of apples both organic and conventional. I would like to offer a personal experience I had with the devastating effects of a fire blight infection in 1995. I was farming a young planting of Pink Lady Apples. It happened to be a particularly bad year for fire blight, plus there was a lack of knowledge of the Pink Lady sensitivity to the disease at that time. Streptomycin was in use although timing of application may not have been perfect. The effects of this infection were severe. After spending countless man hours pruning out the infection, and subsequent infections that spring, the orchard was left severely deformed. Over the next two years I nursed this orchard along battling subsequent infections due to over wintering cankers. Finally it came to the point where only 45% of the bearing surface remained productive, and the decision was made to pull the orchard and replant. The reason I am sharing this experience with you is to make the point known that to continue to farm apples organically before a viable alternative to control this bacteria is a high stakes gamble! I wish to transition more of my apple acres from conventional to organic. I am not opposed to phasing out the use of antibiotics in organic farming. I am opposed to not having a viable alternative before it is done. The stakes are too high.
18. **Clark, Ariel** of Everett, WA is a future nurse, mom to a 5 year/old girl and strives to feed her family the cleanest and healthiest food possible. She opposes strep in organic apple, pear production. Form.
19. **Cotton, Darla** of Florence opposes the use of streptomycin in organic apple and pear production: “As a family that nearly lost our loved one to a septic antibiotic-resistant staph infection, we have serious concerns about the use of antibiotics in our food supply. The continued use of these antibiotics in our food supply is contributing to bacterial strains becoming stronger and more virulent, leaving fewer options to treat serious infections. We have made the conscious effort to purchase 'organic' foods in order to avoid some of the harm that results from mass farming and agriculture today. We implore you to, once and for all, eliminate the use of the antibiotics in foods so that those antibiotics can be most effectively used when a true need for them in a danger situation is presented.”
20. **Denevan, Bill** supports the extension of strep. He is a representative for **Viva Tierra** an organic brokerage company, he is also an organic Bartlett pear and apple grower. He is also an elected official on the board of directors of the California Apple Commission and represents District 2 for both conventional and organic apple growers. “The reason I am a little tardy in responding is that I was burning pear trees all night on my property. In addition Two of my large growers reported their blight situation the day before yesterday. One grower in Reedely California used antibiotics and had a little blight but the other grower used the newly recommended remedy called ‘Blossom Protect’ plus Cueva in the amounts and timing deemed proper in experiments done in Washington. As I testified last year in Portland this combo needs more trials before us its usage.

The one grower doing everything recommended by the latest ‘organic science’ has the worst blight he has ever seen. The other grower who used antibiotics has a much lighter amount of

blight. We need 3 more years of research as to what protocol and materials should be used to protect our trees from dying”

21. **DeSisto, Susan** of Orange, CA has an immune system that has been compromised, se is on doctor’s order to eat “whole, organic, healthy foods so I try to feed myself the cleanest healthiest food possible. There are many people like myself, including several family members, whose immune systems are under attack by all the synthetic ingredients currently in use. Allergies are becoming epidemic.” She opposes strep in organic apple, pear production. Form.
22. **Ducat, Stephen** of San Francisco, CA opposes the use of streptomycin in organic apple and pear production. “I treat patients who frequently suffer from conditions secondary to unnecessary antibiotic exposure.”
23. **Dr. William Skip Dykoski** of New Brighton, MN opposes the use of antibiotics in apple and pear production. BP Form comment.
24. **Engelbrecht, Luz** is a former health educator and public health manager who opposes the use of antibiotics in apple and pear production. Form.
25. **Hering, Kathleen, RN, MSN, Holstic Nurse Practitioner** opposes the extension of organic apple and pear production. “I am trained as a master's prepared Nurse Practitioner and I am very concerned about our food quality. Using antibiotics in any food be it cattle, fruit, nuts etc will only make what ever we are trying to kill stronger since to kill any microbe at 100% is nearly impossible and not very practical. (this was taught to me in my basic genetics courses required for my degree). Instead organic standards must be maintained so that the organic label means something. I want it to mean that the food isn't GMO or been treated with antibiotics (which by the way means against (anti) life (biotic)).
26. **Herman, Diana** of Waddell, AZ “I am a grandmother of fourteen children and strive to feed my family and teach them the cleanest and healthiest food possible. Three of my grandchildren suffer from esophinophils in their intestines which is related to food allergies...”
27. **Howell, Beverly** of Danville, PA works in the health care field and opposes the use of streptomycin in organic apple and pear production
28. **Kozuki, Tadashi** is an organic grower in Parlier CA who supports the extension of streptomycin. “If you do not extend the use of streptomycin, it will be very difficult for us(growers) to continue as organic producers. You will force many to become conventional growers just to survive. At this time, there are no effective replacements for streptomycin in the battle against fireblight. Research continues to find a replacement , but the success is marginal at best. Please allow us to use streptomycin until research finds a replacement. Please extend its use for three more years.”
29. **KC, Daniela** of Franklin, TN opposes the use of streptomycin in organic apple and pear production. Her family is afflicted with severe Multiple Chemical Sensitivities and have allergies due to former antibiotic overuse.
30. **Kline, Connie** of Willoughby Hills, OH opposes streptomycin in organic apple and pear production. She is chemically sensitive as she was sprayed with diazinon when she was a little girl. She expects now to be able to purchase food free to antibiotics and pesticides.

31. **Morris, Glenn, MD, MPH &TM** Professor and Director of University of Florida Pathogens Institute, Fellow at the Infectious Disease Society of America strongly opposes the use of streptomycin in organic apple and pear production. “A key driver in development of antimicrobial resistance is antibiotic use. While use of antibiotics in human medicine is a critically important element in development of resistance, there is a growing scientific consensus that use in agriculture plays an important role in this process. Our research group here at the University of Florida has been involved for many years in work assessing the impact of antimicrobial use in agriculture on development and transmission of antibiotic resistance in human populations. Based on available data.. there is some degree of risk that continued use of streptomycin, as proposed in the petition, will result in further development of streptomycin resistance in bacteria in the immediate orchard environment, with, in turn, the potential for further spread within the environment and ultimate transfer to humans”
32. **Otero, Alvin** of Guaynabo, PR “I have several ailments in the digestive system and it is imperative for me as directed by doctors to eat the most simple foods like fruits and vegetables....I MUST know what I’m heating hence I need the healthiest food possible. My well being depend on this.
33. **Oyster, David DMD, MS, American Board of Periodontology of Mount Pleasant, SC** is a healthcare provider who opposes the use of streptomycin in organic apple and pear production. “ANY ANTIBIOTIC USE, (other than in humans to fight active bacterial (not viral) diseases), is totally unethical, immoral, and unscientific.”
34. **Porter, Warren, PhD.** opposes the use of antibiotics on food because of their ability to generate resistance in bacteria that could subsequently impact on gut function. “ He is a professor of Zoology and Professor of Environmental Toxicology who has worked on low-level exposures and their significant effects of pesticides and GMO contaminants in food for more than 20 years. My research has focused on immune, endocrine, neurological, developmental, and epigenetic effects of such contaminants. None of these effects are part of the registration process that EPA has for food safety. The scientific data from research hand that of my colleagues around the globe have caused me to be gravely concerned about the safety of our food and the future of our children.”
35. **Seubert, Mychael** of Garden City, NY is a doctor “and am alarmed at how contaminated our food supply has become – it is chilling. Minimizing the amount we are exposed to in our food/water supply is one of the most critical steps we can take in ensuring our future health, and more importantly our children’s health.” He opposes strep in organic apple, pear production. Form.
36. **ShoderEhri, Ruthe**, Douglas, AZ is a retired nurse who opposes the use of streptomycin in organic apple and pear. Form comment.
37. **Simpson, Janet** is a certified holistic health coach who opposes strep in organic apple, pear production. Form.
38. **Storey, Anne** of Thronton, CO opposes the use of streptomycin in organic apple and pear production. “My husband is currently struggling with repeated infections in his leg where he had surgery to repair injuries from being hit by a car while crossing the street. He and his doctors struggle to use the right antibiotic to get rid of the infection which seems to recur every year. Unfortunately, they usually start with a low grade antibiotic which doesn't work, resulting in

multiple prescriptions and multiple doctor visits, which becomes very expensive when on a retirement income.”

39. **Tessling, Alysia** is a nurse who opposes strep in organic apple, pear production. “I personally care for individuals, possibly your own family members or yourself, and communities affected by the effect of what we put into our bodies, into the water we drink, and the air we breathe.”
40. **Weber, Miriam** of Tucson, AZ opposes the use of streptomycin in organic apple and pear production: “I am a physician who works with and treats patients who have poor immune systems and who frequently have inadequate liver function. Because of that, they are not capable of successfully processing the routine chemicals found in non-organic food. Therefore, I generally recommend, as part of their therapeutic regimes, that they eat organic food. These individuals are sensitive enough that they see a significant improvement in their medical conditions when they switch to organics’ am very concerned that our current organic standards will be weakened if we allow synthetic agents to be used in organic food production and if the continued use of antibiotics on organics is sanctioned. High quality organic food is an indispensable tool in my therapeutic arsenal.  
The application of antibiotics to organics during the production process is worrisome. Antibiotics are not harmless. Each agent can cause adverse reactions in sensitive individuals. When I prescribe antibiotics, I monitor patients for these adverse effects. These are not agents that we should have on our food....”
41. **Karlin, Florence** of Sarasota, FL opposes streptomycin in organic apple and pear production. She has food allergies and is sensitive to antibiotics.
42. **Meliher, Michael** of Ravenna is a nurse in a large hospital, and sole provider and care giver to his 85 year old mother. He opposes strep in organic apple, pear production. Form.
43. **Steele, Bonnie** of Happy Jack, AZ is allergic to streptomycin and opposes streptomycin in organic apple and pear production
44. **Abraham, M.** of Cleveland, OH opposes streptomycin in organic apple and pear production
45. **Agee, Annette** opposes strep in organic apple, pear production. Form.
46. **Al-Abbas, Selma** of Weare opposes strep in organic apple, pear production. Form.
47. **Alexander, Brian** of Royal Oak, MI opposes strep in organic apple, pear production. BP form.
48. **Ammenwerth, Elizabeth** opposes strep in organic apple, pear production. Form.
49. **Amziane, Marina** of Lic, NY opposes streptomycin in organic apple and pear production
50. **Anderson, Kevin** opposes strep in organic apple, pear production. Form.
51. **Angostino, Elizabeth** of Garnerville opposes streptomycin in organic apple and pear production.
52. **Anonymous** of Seattle, WA opposes strep in organic apple, pear production. Form.
53. **Anonymous** of Boulder, CO opposes strep in organic apple, pear production. Form.
54. **Anonymous** of Somerset opposes strep in organic apple, pear production. Form.
55. **Anonymous** of Dousman, WI opposes strep in organic apple, pear production. Form.
56. **Anonymous** of Stinson Beach, CA opposes strep in organic apple, pear production.
57. **Anonymous** of Binghamton opposes streptomycin in organic apple and pear production.
58. **Anonymous** of Palo Alto, CA – opposes streptomycin in organic apple and pear production
59. **Anonymous** of North Little Rock, AR- opposes streptomycin in organic apple and pear production



60. **Anonymous** of Madison, WI opposes strep in organic apple, pear production. Form.
61. **Anonymous** of Waupaca, WI – opposes streptomycin in organic apple and pear production
62. **Anonymous** of Los Angeles, CA – opposes streptomycin in organic apple and pear production
63. **Anonymous** of Traverse City, MI – opposes streptomycin in organic apple and pear production
64. **Anonymous** of Palos Verdes Estates, CA – opposes streptomycin in organic apple and pear production
65. **Anonymous** of Lake Mary, FL opposes strep in organic apple, pear production. Form.
66. **Anonymous** of Portland OR opposes strep in organic apple and pear production. Form.
67. **Anonymous** of Williamsburg, VA opposes strep in organic apple and pear production. Form.
68. **Anonymous** of West Linn OR opposes strep in organic apple and pear production. Form.
69. **Anonymous** of Rochester opposes streptomycin in organic apple and pear production
70. **Anonymous, Cheryl** opposes strep in organic apple, pear production. Form.
71. **Anonymous, Frankly** opposes strep in organic apple, pear production.
72. **Anonymous, N** opposes strep in organic apple, pear production. Form.
73. **Anonymous, Paul** of New York, NY opposes strep in organic apple, pear production. Form.
74. **Anonymous, Susan** of Granada Hills, CA opposes strep in organic apple, pear production. Form.
75. **Anonymous, Trina** of North Logan opposes strep in organic apple, pear production. Form.
76. **Argani, Sholey** of Takoma Park MD opposes streptomycin in organic apple and pear production.
77. **Armenta, Suzette**, of Tucson, AZ opposes streptomycin in organic apple, pear production
78. **Ayers, Christine** of Orchard Park – opposes streptomycin in organic apple and pear production
79. **B Leandra** is a woman who currently struggles with endometriosis and other health problems and continues to be affected by the food she eats: She opposes strep in organic apple, pear production. Form.
80. **B, Nikki** opposes strep in organic apple, pear production. Form.
81. **Bahr, Richard** opposes strep in organic apple, pear production. Form.
82. **Baklashev, Marina** opposes strep in organic apple, pear production. Form.
83. **Bangs, Margaux** opposes strep in organic apple, pear production. Form.
84. **Barata, Shawna** of Cheshire, CT opposes strep in organic apple, pear production. Form.
85. **Barcion, D** opposes strep in organic apple, pear production. Form.
86. **Batovsky, Natalie** of Union Bridge opposes strep in organic apple, pear production. Form.
87. **Barner, Trish** opposes strep in organic apple, pear production. Form. “I currently suffer from digestive and other health issues and need to eat whole, organic foods and strive to feed my family with the cleanest healthiest food possible.”
88. **Barta, Carla**, opposes strep in organic apple, pear production.
89. **Bartholomew, Ann** of Little Elm, TX is diagnosed with rheumatoid arthritis and hypothyroidism and strives to eat the cleanest food possible. She opposes strep in organic apple, pear production. Form.
90. **Bean, Marylin** of San Francisco, CA opposes the use of streptomycin as it threatens human health
91. **Beckett, Jamie** of McAndrews, KS opposes strep in organic apple, pear production. Form.
92. **Benoist, Donna** of Wilmington, NC – opposes streptomycin in organic apple and pear production
93. **Berger, Susan** of Boise, ID opposes strep in organic apple, pear production. BP form comment.

94. **Berkeley, Jessyca** opposes strep in organic apple, pear production. Form.
95. **Bertrand-Severi, Maria** – opposes the use of streptomycin in organic apple and pear production
96. **Betz, Ginger** opposes strep in organic apple, pear production. Form.
97. **Beverley, J** of Urbana, IL opposes the use of antibiotics in apple and pear production. BP Form comment.
98. **Bielski, Jeff** opposes strep in organic apple, pear production. Form.
99. **Bishop, Kerri** of Chandler AZ opposes strep in organic apple and pear production. Form.
100. **Bluhm, Per** opposes strep in organic apple, pear production. Form.
101. **Boydston, Charlene**, of Pahrump NV opposes strep apple and pear production. Form.
102. **Bowls, Jami** opposes strep in organic apple, pear production. Form.
103. **Bowman, Cheryl** opposes strep in organic apple and pear production. Form.
104. **Brandon, Connie** of Oakland, CA – opposes streptomycin in organic apple and pear production
105. **Brewster, Marci** opposes strep in organic apple, pear production. Form.
106. **Briley, Charles** of Austin TX – opposes streptomycin in organic apple and pear production because of issues of resistance
107. **Brown, Cheryl** of Crawford CO opposes strep in organic apple, pear production. Form.
108. **Brown, Inger** opposes strep in organic apple, pear production. Form.
109. **Brown, Susan** opposes strep in organic apple, pear production. She provides three comments, one form letter, one provides an article by the editorial board entitled “Urgent action needed on ‘superbugs’”, another with an article entitled “The age of antibiotics is coming to an end, as wider variety of bacteria are now impervious”
110. **Burge, Frances** opposes strep in organic apple, pear production. Form.
111. **Vivian Valtri Burgess** opposes the use of antibiotics in apple and pear production. BP Form comment.
112. **Busse, Ken** of Wheaton IL opposes strep in organic apple, pear production. Form.
113. **Butterfield, Lisa** of Eureka CA – opposes streptomycin in organic apple and pear production, Beyond Pesticides form comment, adds personal fear and story of resistance and threats to human health
114. **Caine, Tom** opposes streptomycin in organic apple and pear production. Form.
115. **Cameron, Esther** of Santa Monica, CA – opposes streptomycin in organic apple and pear production
116. **Campbell, Ashley** of Saratoga Spring NY opposes strep in organic apple, pear production. Form.
117. **Carlson, Clifford** of Leydon, MA - opposes streptomycin in organic apple and pear production
118. **Castellano, Alice** of Hopewell Junction, NY opposes streptomycin in organic apple and pear production due to problems with resistance and consumer expectations.
119. **Cattermole, George** of San Georgio opposes streptomycin in organic apple and pear production due to problems of resistance
120. **Cato, Evan** opposes strep in organic apple, pear production. Form.

121. **Cavell, Alan** of Peterborough Canada - opposes streptomycin in organic apple and pear production
122. **Cioffi, Cathy** of Woodstock, NY opposes strep in organic apple, pear production. Form.
123. **Cheek, Tom** opposes strep in organic apple and pear production. Form.
124. **Chow, Kathryn** of Ft. Drum opposes strep in organic apple and pear production. Form.
125. **Clark, James** of Puyallup opposes streptomycin in organic apple and pear production
126. **Clark, Joe** of Denton opposes strep in organic apple, pear production. Form comment
127. **Cole, Shelley** of Riverton WY opposes strep in organic apple, pear production. Form comment.
128. **Coleman, Ava** opposes strep in organic apple and pear production. Form.
129. **Conrow, Angie** opposes strep in organic apple, pear production. Form.
130. **Cook, Justin** opposes strep in organic apple, pear production. Form.
131. **Cooper, Sandra** of Wheatland, WY opposes streptomycin in organic apple and pear production
132. **Coughlan, Renee** opposes strep in organic apple, pear production. Form.
133. **Cox, Edith** of Hingham, MA opposes streptomycin in organic apple, pear production, except if it is listed on a label.
134. **Cramer, Janet** of Lexington OH opposes streptomycin in organic apple and pear production
135. **Crook, Lucy** of Fort Myers opposes strep in organic apple, pear production. Form.
136. **Crossen, Shaorn** of Beavercreek, OH opposes streptomycin in organic apple and pear production
137. **Davis, Barbara** of Morrison, CO opposes strep in organic apple, pear production, she is a cancer survivor and strives to get the healthiest food possible. Form comment.
138. **Davis, Helene** of Long Beach, CA opposes streptomycin in organic apple and pear production
139. **Dean, Chrys** opposes strep in organic apple, pear production. Form.
140. **DeGeorge, Ron** of New Hartford, NY opposes streptomycin in organic apple and pear production, form comment
141. **Deis, Julie** opposes strep in organic apple, pear production. "I am a teacher, songwriter, playwright and novelist in Dayton, Ohio. It is a sad state of affairs when a letter must be written asking governmental agencies to keep my food clean of hormones, pesticides and preservation that causes illness and cancer, when I should be able to shop the aisles of my crockery store with peace of mind and feeling secure that no one is allowed by the FDA to poison me or my family. The organic label is what gives me that sense of security." She opposes strep in organic apple, pear production.
142. **Dethiers, Bernard** of San Francisco CA opposes strep in organic apple, pear production
143. **Heidi Dew**, opposes the use of antibiotics in apple and pear production.
144. **Dietrick, Barbara** of Chicago, opposes strep in organic apple and pear production standing with medical experts
145. **DiVicino, Roseann** of Port Richey, FL opposes strep in organic apple and pear production
146. **Doyle, Lois** of Vermillion opposes streptomycin in organic apple and pear production

147. **Driscoll, Lisa** of Albuquerque, NM opposes streptomycin in organic apple and pear production as it should be used in clinical settings only
148. **Dumont, Lynette** of Golden, CO opposes strepin organic apple and pear production as it should be used for human medicine
149. **Dunham, Frances** opposes streptomycin in organic apple and pear production.
150. **Durkee, LaVerne H.** of Ithaca, NY opposes strep in organic apple and pear production
151. **Duvall, Karen** of St. Leo, FL opposes strep in organic apple and pear production. Form
152. **Elliott, Maura** of Dayton NJ opposes strep in organic apple and pear production. Form.
153. **Ellis, Lin** of Dallas, TX opposes streptomycin in organic apple and pear production. Form.
154. **Ellis, Shelley** of Ridgecrest, CA opposes strep in organic apple and pear production.
155. **Elsamahy, Beatrice** of Houston, TX opposes strep in organic apple and pear production.
156. **Engler, Tim** of Huntington Beach CA opposes strep in organic apple, pear production
157. **Ende, Elizabeth**, of McLean opposes the use of strep in apple, pear production. Form.
158. **Epperson, Kyle** of Trenton, OH opposes strep in organic apple, pear production. Form.
159. **Ferreyra, Dean** of Santa Ana CA opposes the use of streptomycin in organic apple and pear production. Form comment
160. **AF** of Bremerton opposes the use of antibiotics in apple and pear production. Form.
161. **Fadness, Kent** opposes strep in organic apple and pear production. Form.
162. **Fink, Brian** of Philadelphia PA opposes strep in apple, pear production. Form.
163. **Fischer, ED** is a cancer survivor who relies on clean organic non-GMO foods to stay healthy. He opposes streptomycin in organic apple and pear production. Form.
164. **Flite, Barbara** of Futz FL opposes streptomycin in organic apple and pear production.
165. **Florisheim, Nancy** of Milwaukee, WI opposes streptomycin in organic apple and pear production as it diminishes the value for humans
166. **Floyd, Robert MD** opposes streptomycin in organic apple and pear production. Form.
167. **Flynn, B** of Brooklyn, NY opposes streptomycin in organic apple and pear production
168. **Flynn, Jon** of Brooklyn, NY opposes streptomycin in organic apple and pear production
169. **Fonfa, Ann** of Deray Beach, FL opposes the use of streptomycin in organic apple and pear production “I am an Advocate for people with cancer. I founded Annie Appleseed Project providing information about natural approaches to help people get and stay healthy to deal with cancer. We DO NOT support the use of Antibiotics in fruit. It is important to remove antibiotics from food production and SAVE them for humans when needed.”
170. **Fortin, Kim** opposes strep in organic apple, pear production. Form.
171. **Friesen, Brian** of Cape Coral, FL opposes strep in organic apple, pear production. Form.
172. **Friedman, JoAnne** of Cascade WI opposes strep in organic apple and pear production
173. **Garcia, Flora Pino** of Alameda del Valle, Spain opposes strep in organic apple, pears
174. **Gaucher, Trista** opposes strep in organic apple and pear production. Form.
175. **Giles, Karen** of Portage PA opposes strep in organic apple and pear production. Form.
176. **Glasgow, Barbara** of North Brunswick opposes strep in organic apple pear production
177. **Gierlach, Marian Baker** opposes streptomycin in organic apple, pear production. Form.
178. **Gilbert, Valerie** opposes strep in organic apple, pear production. Form.
179. **Gillooly, Jennifer** of Bluffton, SC opposes strep in organic apple, pear production. Form.

180. **Ginter, Rodney** opposes strep in organic apple and pear production.
181. **Graham, Karen** opposes strep in organic apple and pear production. Form.
182. **Goodkind, Mary** of Biltmore Forest NC opposes strep in organic apple, pear production.
183. **Goot, Yvette**, of Chewelah opposes strep in organic apple and pear production. Form
184. **Greco, Jackie** opposes strep in organic apple, pear production. Form.
185. **Greene, Ivan** of Carmichael, CA opposes strep in organic apple and pear production.
186. **Greene, Linda** of Unionville, IN opposes strep in organic apple, pear production.
187. **Grier, Cynthia** of Ojai, CA opposes streptomycin in organic apple and pear production
188. **Griffin, Sandra** of North Reading, MA opposes strep in organic apple, pear. Form.
189. **Hagen, Charlot** opposes strep in organic apple, pear production.
190. **Hahn, William** of Dover, TN opposes streptomycin in organic apple and pear production
191. **Hain, Diane** of Baltimore, MD opposes strep in organic apple, pear production. Form.
192. **Halbertsma, Emrys** Collingwood, Canada opposes strep in organic apple, pear production. "I am a high school athlete and want the cleanest and healthiest food possible to fuel my body to perform, and to minimize my ecological footprint." Form.
193. **Haller, Alicia** of Soldotna AK opposes strep in organic apple, pear production. Form.
194. **Harris, Lesley** opposes strep in organic apple, pear production. Form.
195. **Harrison, Randy** of Eugene, OR opposes strep in organic apple, pear production
196. **Harryman, Robert** of Arvada, CA opposes strep in organic apple, pear production
197. **Harvey, Elizabeth** opposes strep in organic apple, pear production. Form.
198. **Hatch, Kerry** of Sherman Oaks opposes streptomycin in organic apple, pear production
199. **Hauck, Molly** opposes strep in organic apple, pear production. Form.
200. **Hawthorne, Rosemary** of San Leandro, CA opposes strep in organic apple and pear production because of issues with resistance and implication for humans
201. **Hetzel, Anthony** of Garrettsville, opposes strep in organic apple and pear production
202. **Heuman, Christopher** opposes strep in organic apple, pear production. Form.
203. **Hewett, Maureen** of Bound Brook, NJ opposes strep in organic apple, pear production. Form.
204. **Hewitt, Crissey** opposes strep in organic apple, pear production. Form.
205. **Hill, Kim** of Cicero, NY opposes strep in organic apple, pear production. Form.
206. **Hillard, Candace** of Schertz TX opposes strep in organic apple, pear production. BP Form
207. **Hinckley, Wendy** opposes strep in organic apple and pear production. Form.
208. **Holden, Grace** opposes strep in organic apple, pear production.
209. **Holt, Sandra** of Casselberry, FL opposes strep in organic apple and pear production. She feel betrayed that they were there in the first place.
210. **Hollis, Ronald** opposes streptomycin in organic apple and pear production.
211. **Jourican, Liz** opposes strep in organic apple, pear production. Form.
212. **Hubbard, Bradley** opposes strep in organic apple and pear production. Form.
213. **Hume, Joelle** of Ivins UT opposes streptomycin in organic apple and pear production
214. **Hatchins, Colin** opposes strep in organic apple, pear production. Form.
215. **Huxley, Frederica** opposes strep in organic apple, pear production. Form.
216. **Irwin, Louis** of Ipswich, MA opposes streptomycin in organic apple and pear production

217. **Illes, Gregory** of Los Gatos, CA opposes strep in organic apple, pear production Form.
218. **Jankunas, Irena** opposes strep in organic apple, pear production. Form.
219. **Jimenez, D** of Santa Barbara, CA opposes strep in organic apple and pear production
220. **Jacques, Pamela** opposes strep in organic apple, pear production. Form.
221. **Johncox, Pam** of Pittsboro, NC opposes strep in organic apple and pear production
222. **Johnson, David** opposes strep in organic apple, pear production. Form.
223. **Johnson, Renee** of Lancaster, CA opposes strep in organic apple, pear production. Form.
224. **Johnson, Vanessa** of Stoneham, MA opposes strep in organic apple and pear  
production.
225. **Jones, Katherine** of Missouri, TX opposes strep in organic apple, pear production. Form.
226. **Jongejan, Cassie** of Chester, VA opposes strep in organic apple and pear production.  
Form.
227. **Jennifer Karches** opposes strep in apple, pear production. Form.
228. **Kaluza, Mary Ellen** of Minneapolis, MN opposes strep in organic apple, pear production
229. **Kays, Laura** of Havre de Grace, MD opposes strep in organic apple and pear production.  
Form.
230. **Kazmierski, Kristi** of Billings, BT opposes strep in organic apple, pear production. Form.
231. **M Keefe** of Staton Island, NY opposes strep in apple, pear production. Form comment.
232. **Keeran, Georgia** opposes strep in apple, pear production. Form comment.
233. **Kegler, Lori** opposes strep in organic apple, pear production. Form.
234. **Kelly, Kimberley** of Des Moines IA opposes strep in organic apple, pear production.  
Form.
235. **Kemper, KaCee** opposes strep in organic apple, pear production. Form.
236. **Kesler, Mary** of Madison, WI opposes streptomycin in organic apple and pear  
production
237. **Ketchum, Jennifer** opposes strep in organic apple, pear production. Form.
238. **Kirk, Deborah** of Castro Valley, CA opposes streptomycin in organic apple and pear  
production especially as antibiotic resistance has become a serious medical problem
239. **Knight, Bobbie** of Denver, CO opposes strep in organic apple and pear production.
240. **Kozdron, Rosemarie** of Rockton opposes strep in organic apple and pear production
241. **Krause, Doug** of Fargo opposes strep in apple and pear production. BP Form comment.
242. **Krech, Dawn** of Olympia, WA opposes strep in organic apple and pear production
243. **Kritikos, Cynthia** of Las Vegas, NV opposes strep in organic apple and pear production
244. **Kroeber, Tanya** of Jacksonville opposes strep in organic apple, pear production. Form.
245. **Kuykendall, Janet** opposes strep in organic apple, pear production. She has multiple  
sclerosis, lost her husband and mother to cancer and uses organic food to stay healthy.
246. **Lacey, Rick** of Austin opposes streptomycin in organic apple and pear production
247. **Lafferty, MA** of Coral Springs, FL opposes strep in organic apple and pear production
248. **Landress, Judy** opposes strep in organic apple, pear production. Form.
249. **Langlois, Cheri** of Mendocino, CA opposes strep in organic apple, pear production.  
Form.
250. **Lawson, Karen** opposes strep in organic apple and pear production. Form.

251. **Ludy Landress** of Corpus Christie, TX opposes use of strep in apple and pear production.
252. **Le, Luan** of Arlington TX opposes strep in organic apple and pear production. Form.
253. **Lehman, Cathy** of Dover Plains NY opposes strep in organic apple, pear production.  
Form.
254. **Levin, Joan** of Chicago, IL opposes streptomycin in organic apple and pear production.
255. **Levinson, Seth** of Halifax, Canada opposes streptomycin in organic apple and pear  
production
256. **Lewis, Jeanette** opposes strep in organic apple, pear production. Form.
257. **Lira, Patricia** of Oak Hill opposes the use of strep in organic apple and pear production
258. **Lohrer, Laurie** of Lewistown, MT opposes strep in organic apple, pear production
259. **Lovett, Li** opposes strep in organic apple, pear production. Form.
260. **Lunger, Greg** opposes strep in organic apple, pear production. Form.
261. **Lyles, Neely** of Mason, TX opposes streptomycin in organic apple and pear production
262. **Lytle, Rachel** opposes strep in organic apple, pear production. Form.
263. **Joseph Liccese** of Hardwick, NJ opposes the use of antibiotics in apple and pear  
production. Form.
264. **Patsy Lowe** of Simi Valley, CA opposes the use of antibiotics in apple and pear  
production. BP Form comment.
265. **Michelle MacKenzie** of San Carlos opposes the use of antibiotics in apple and pear  
production. Form.
266. **Lynn Magnuson** of Valley Center, CA opposes the use of antibiotics in apple and pear  
production. Form.
267. **Sally Malanga** of West Orange opposes the use of strep in apple, pear production. Form.
268. **Macdonald, Doris** of Norfolk, MA opposes strep in organic apple and pear production
269. **MacDowell, Kathleen** of Nashville, TN opposes strep in organic apple, pear production
270. **Maclsaac, Karen** of Roslindale, MA opposes strep in organic apple, pear production
271. **Malstead, Kat** opposes strep in organic apple and pear production. Form.
272. **Mara, Roxanne** opposes strep in organic apple, pear production. Form.
273. **Markitan, Renee** of Stratford, CT opposes strep in organic apple and pear production
274. **Mathia, Cathy Robertson** opposes strep in organic apple, pear production. Form.
275. **Martin, Christopher** of Carlisle, OH opposes strep in organic apple, pear production.  
Form.
276. **Maupin, Donna** of Seattle, WA opposes strep in organic apple, pear production. Form.
277. **McCarty, Keith** of O Fallon, MO opposes strep in organic apple and pear production
278. **McGee, Sandra** of Withrop Harbor IL opposes strep in organic apple, pear production.  
Form.
279. **McGillicuddy, Joan** of Huntington, NY opposes strep in organic apple, pear production
280. **McGonagle, Richard** of Burbank, CA opposes strep in organic apple, pear production
281. **McGough, Alice** opposes strep in organic apple, pear production. Form.
282. **McGowen, Linda** opposes strep in organic apple, pear production. Form.
283. **McGowen, Laura** opposes strep in organic apple, pear production. Form.
284. **McLean, Laura** of Grand Junction, CO opposes strepin organic apple, pear production

285. **McNeil, Doug** of Greenbelt opposes streptomycin in organic apple and pear production
286. **Meade, Amy** opposes strep in organic apple, pear production. Form.
287. **Miller, Judy** opposes strep in organic apple, pear production. Form.
288. **Mineah, Kristin** of Port Ludlow, WA opposes strep in organic apple, pear production.
289. **Mittenberg, Michael** of Astoria NY opposes strep in organic apple, pear production.  
Form.
290. **Mark Moore** of Tehapachi, CA opposes the use of strep in apple and pear production.
291. **Morris, Jamie** opposes strep in organic apple, pear production. Form.
292. **Morrow, Pamela** of Flager Beach, FL opposes strep in organic apple, pear production.  
Form.
293. **Carolyn Myers** of Cleburn, TX opposes the use of strep in apple, pear production. Form
294. **Nesselbush, Janet** of Sacramento, CA opposes strep in organic apple, pear production.
295. **Newman, Kayla** of Janesville opposes strep in organic apple and pear production. Form.
296. **Nichols, James** of Saint Ann, MO opposes strep in organic apple, pear production. Form.
297. **Niemiec, Sandy** of Grant opposes the use of strep in organic apple and pear production.
298. **Nikam, Deepti** of Conway opposes the use of strep in organic apple, pear production.
299. **O'Hara, Lin** of Greeley, CO opposes streptomycin in organic apple and pear production
300. **Oberholtz, Donna** of Washington opposes strep in organic apple and pear production
301. **Olbricht, Marilyn** of Derry NH opposes strep in organic apple, pear production. Form.
302. **Randy ONeil** of Seabring, FL opposes strep in apple and pear production. Form.
303. **David Osterhoudt** of Rancho Santa Margarita, CA opposes the use of antibiotics in apple  
and pear production. BP Form comment.
304. **Otto, Inge of Bronx**, NY opposes strep in organic apple, pear production
305. **Pack, Rodger** of London, OH opposes strep in organic apple, pear production. Form.
306. **Palmer, Jean** of Lincoln, MA opposes strep in organic apple and pear production. Form.
307. **Paris, Kristin** opposes strep in organic apple, pear production. Form.
308. **Perdomo, Evelyn** of London, Canada opposes strep in organic apple, pear production
309. **Perrone, Jodi** of Elm Grove opposes strep in organic apple, pear production
310. **Phillips, Michelle** of Pleasantville opposes strep in organic apple and pear production
311. **PeBenito, Ruta** of Lombard opposes strep in organic apple, pear production. Form.
312. **Pelegrina, Marge** of Tucson AZ opposes strep in organic apple and pear production.
313. **Peterson, Allan** opposes streptomycin in organic apple and pear production.
314. **Pierce, Becky**, of Corrales opposes streptomycin in organic apple and pear production
315. **Portell, Florence**, of Sun City, AZ opposes strep in organic apple and pear production
316. **Poulsen, Barbara** opposes strep in organic apple and pear production. Form.
317. **Power, Jude** of Bayside, CA opposes streptomycin in organic apple and pear production
318. **Price, David** of Prescott, AZ opposes strep in organic apple, pear production
319. **Janis Prifti** of Southwick, MA opposes streptomycin in organic apple and pear  
production
320. **Prosterman, Janice** of Omaha NE opposes strep in organic apple and pear production.
321. **Phillipe, Randall** of Woodland Hills, CA opposes strep in organic apple, pear production.
322. **Quibell, Candace** of Bisbee, AZ. opposes strep in organic apple, pear production.



323. **Elke Raab** of Santa Cruz, CA opposes the use of antibiotics in apple and pear production. Form comment.
324. **Resnick, Karelina** of Eatonville, WA opposes strep in organic apple, pear production.
325. **Richardson, Katherine** of Surry opposes strep in organic apple and pear production.
326. **Rogenmoser, Sharon** opposes strep in organic apple, pear production.
327. **Rogers, Kenneth** of Tunnel Hill GA opposes strep in organic apple, pear production. Form.
328. **Rogers, Rosemary** of Athens OH opposes strep in organic apple, pear production
329. **Roth, Jesse** of Vinita, OK opposes strep in organic apple, pear production. Form.
330. **Salmon, Georgia** opposes strep in organic apple and pear production. Form.
331. **Salica, Christina** Staten Islan, NY opposes strep in organic apple, pear production. Form.
332. **Samuels, Cheryl** of Harrisburg, PA opposes strep in organic apple, pear production. Form.
333. **Sanchez, Reina** of Salton City, CA opposes strep in organic apple, pear production
334. **Linda Scarpo** of Clinton, CT opposes strep in apple, pear production. Form.
335. **L Schwartzman, PhD** of Chicago opposes the use of antibiotics in apple and pear production. Form.
336. **Paul Seer** of Portland, OR opposes the use of antibiotics in apple and pear production. Form.
337. **Seldon, Wendy** of Ashland opposes streptomycin in organic apple and pear production
338. **Shiner Michelle** opposes streptomycin in organic apple and pear production, Form.
339. **Sievers, Brandy** of Monmouth opposes strep in organic apple, pear production. Form.
340. **Sinclair, Jennifer** of Grosse Ile, MI opposes strep in organic apple, pear production
341. **D. Singer** of Oakland, CA opposes the use of antibiotics in apple, pear production. Form.
342. **Skinner, Mark** opposes streptomycin in organic apple and pear production.
343. **Sloper, Clinton** of Nashua, NH opposes streptomycin in organic apple, pear production
344. **Smith** of Joshua Tree, CA opposes streptomycin in organic apple and pear production
345. **Smith, Russell** of Orlando, FL opposes strep in organic apple, pear production. Form. He has direct medical problems because of our tainted food supply.
346. **Catherine Snyder** of Indianapolis, IN opposes strep in apple, pear production. Form.
347. **Soroczak, Sherry** of Staunton, VA opposes strep in organic apple, pear production. Form.
348. **Soule, Judy** opposes strep in organic apple, pear production. Form.
349. **Sprague, Jennifer** opposes strep in organic apple, pear production. Form.
350. **Stack, Sylvia** of Annandale opposes streptomycin in organic apple and pear production
351. **Stanton, Duane** of Kimberton PA opposes strep in organic apple and pear production. "I believe that the currently established timeline to end streptomycin use by the end of 2014 should be followed, and that the implementation of more sophisticated cultural controls, biological controls, etc. (as seen around the world in lieu of streptomycin use) offers a superior alternative to an extended timeline."
352. **Sutherland, Jacob** opposes strep in organic apple, pear production. "I am a 21 year old contractor struggling with bills, no credit, and low income, finding work is rare so foodstamps

covers 90% of my food bill, even so I still never buy conventional food, or food I know has been genetically modified. I view the organic seal as a savior in a store full of products with non-food ingredients, synthetic, and not meant for human consumption...The Organic Seal should never be a label that I distrust and neither should it be for the rest of America." Form.

353. **Smith, Karen** of Westchester, IL opposes strep in organic apple and pear production.
354. **Standish, L** of Pepper Pike OH opposes streptomycin in organic apple, pear production
355. **Stevens, Merritt** of Spotsylvania, VA opposes strep in organic apple, pear production
356. **Stewart, Linda** opposes strep in organic apple, pear production. Form.
357. **Storli, Farrah** of Meridian opposes strep in organic apple, pear production. Form.
358. **Streisel, Scott** of Fredericksburg, VA opposes strep in organic apple, pear production. Form.
359. **Switkes, Renee** opposes strep in organic apple, pear production. Form.
360. **Swyers, Matthew** of Livermore, CA opposes strep in organic apple and pear production.
361. **Tait, Brian** of Arnprior, Canada opposes streptomycin in organic apple, pear production
362. **Talbot, G** of Huntley IL opposes streptomycin in organic apple and pear production.
363. **Tapp, Rose** opposes strep in organic apple, pear production. Form comment.
364. **Taylor, Annette** opposes strep in organic apple, pear production. Form.
365. **Taylor, Jane** of Kamuela, HI opposes streptomycin in organic apple and pear production
366. **Taylor, Khanda** opposes strep in organic apple, pear production. Form.
367. **Teichman, Theresa** opposes strep in organic apple, pear production. Form.
368. **Terry, Louise** of Saint Louis opposes streptomycin in organic apple and pear production.
369. **Theetge, Jessica** of Coventry, RI opposes strep in organic apple, pear production.
370. **Therriault, Jennifer** opposes strep in organic apple, pear production. Form.
371. **Thomas, Mary** of Weed, opposes streptomycin in organic apple and pear production
372. **Thompson, Darrell** of Bisbee opposes strep in organic apple, pear production. Form.
373. **Tillman, Eric** opposes strep in organic apple, pear production. Form.
374. **Toolan, Patricia** opposes strep in organic apple, pear production. Form.
375. **Totels, Kevin** opposes strep in organic apple, pear production. Form.
376. **Traband, Lenore** of Woodbury, NJ opposes strep in organic apple, pear production
377. **Tray, Steven** of Centerport, NY Taylor, opposes strep in organic apple, pear production
378. **Treadwell, Cynthia** opposes strep in organic apple and pear production. Form.
379. **Trump, Jacqueline** opposes strep in organic apple, pear production. Form.
380. **Tunney, Kathy** opposes strep in organic apple, pear production. Form.
381. **Turber, Melissa** opposes strep in organic apple, pear production. Form.
382. **Turner, Linda** of Hampden, ME Taylor, opposes strep in organic apple, pear production
383. **Turner, Suzy** of Starkville Taylor, opposes strep in organic apple and pear production
384. **Turuseta, Lucille** of White Plains, NY opposes strep in organic apple, pear production. Form.
385. **Tyler, Tina** opposes strep in organic apple, pear production. Form.
386. **Typer, Theresa** opposes strep in organic apple, pear production. Form.
387. **Upson, Natalie** of Davis, CA opposes strep in organic apple, pear production. Form.
388. **Valero, C** of Pompton Plains, opposes strep in organic apple, pear production. Form.

389. **Vandenberg, Edward** of Emeryville, CA opposes strep in organic apple, pear production
390. **Van Allen, Deena** opposes strep in organic apple, pear production. Form.
391. **Vanover, Andrew** of Grand Rapids opposes strep in organic apple and pear production
392. **Van Wicklen, Betty** opposes strep in organic apple and pear production. Form.
393. **Vargas, Antonio** opposes strep in organic apple, pear production. Form.
394. **Vigne, Diane** opposes strep in organic apple and pear production. Form.
395. **Vinciguerra, Ken** of Cleveland OH opposes strep in organic apple, pear production. Form.
396. **vonTauffkirchen, Elizabeth** of Bayfield opposes strep in organic apple, pear production.  
Form comment.
397. **Vosyka, Sharon** of Hanover Park, IL opposes strep in organic apple and pear production
398. **Walker, Maria** of Kappa opposes streptomycin in organic apple and pear production.
399. **Weber, Robert** opposes strep in organic apple, pear production. Form.
400. **Webber, Catherine** opposes strep in organic apple, pear production. She is an environmental engineer and understands how contaminants can affect the environment and health. Form comment.
401. **Webber, Gary** of Alberton, MT opposes streptomycin in organic apple, pear production
402. **Webster, William** of Oroville, CA opposes strep in organic apple, pear production
403. **Wells, Holly** of Columbia, CT opposes strep in organic apple, pear production. Form.
404. **Weng, Carolyn** of San Bruno opposes streptomycin in organic apple and pear production
405. **Weston, Melanie** of Salem, OR opposes streptomycin in organic apple, pear production
406. **Wexler, Cindy** of Plantersville, TX opposes strep in organic apple, pear production.  
Form.
407. **White, Jeffery** of Forest Grove OR opposes strep in organic apple, pear production.  
Form.
408. **Clair Whitecomb** of Madison opposes the use of strep in apple, pear production. Form.
409. **Williams, Jeremy** opposes strep in organic apple, pear production. Form.
410. **Williams, Katina** of Nashville, TN opposes strep in organic apple and pear production
411. **Williams, Sara** of Cherry Valley, CA opposes strep in organic apple, pear production
412. **Wisnosky, Kevin** of South Plainfield, NJ opposes strep in organic apple, pear production.  
Form.
413. **Wolf, Carol** of West Chester, PA opposes streptomycin in organic apple, pear production
414. **Woodall** Sandra opposes strep in organic apple, pear production. Form.
415. **Wyrick, Nancy** opposes strep in organic apple, pear production. Form. "I have Dercum's Disease, which is rare and has no cure. The food that I eat makes a huge impact on my quality of life. Toxins are extra harmful to my body... I need to be able to trust the organic seal to ensure we are eating as healthy as possible.
416. **Ziegler, Amy** of Lakewood opposes streptomycin in organic apple and pear production

## Aqueous Potassium Silicate

Support Renewed Listing: 1 grower

Oppose Renewed Listing: 2 organizations (Cornucopia, Beyond Pesticides); 5 individuals

1. **Cornucopia Institute** does not support the renewed listing of APS as the initial approval was based on insufficient review; specific use for fertilizer, disease control, and insecticide use should be clarified; alternatives are available; information is needed on accumulation of silica in plants; and international standards do now allow aqueous potassium silicate in crop production.”
2. **Terry Shistar of Beyond Pesticides:** “Beyond Pesticides urges the Crops Subcommittee (CS) to oppose the relisting of aqueous potassium silicate for both the insecticide and the plant disease control uses. It has been found by the NOSB not to meet the OFPA criteria of essentiality and compatibility with organic production. There are potential adverse impacts that have not been evaluated by the NOSB. Furthermore, under the new sunset process directed by the NOP, unless the CS proposes not to relist aqueous potassium silicate, it may not come before the full board for a vote on future use, as required by the sunset policy of the Organic Foods Production Act (OFPA) and, historically, the Board.”
3. **Brown, Susan** of La Mesa opposes the relisting of APS for both the insecticide and plant diseases control uses. Form comment.
4. **Vivian Valtri Burgess** of Granville, VT opposes the relisting of APS for both the insecticide and the plant disease control uses. Form comment
5. **Dunham, Frances** of Gulf Breeze “Aqueous potassium silicate has not been adequately analyzed for potential harmful effects. I oppose its use in organic production. Since organic methods of soil **conservation make its use unnecessary, it should not be allowed.**
6. **Peterson**, Allan APS has not sufficiently studied to determine impact on nutritive value. Committee should recommend the substance not be relisted.
7. **Rose, Stephanie** of Wilmington, IL supports the relisting of APS. The TR says that when APS enters the soil from plant treatment it is indistinguishable from silicates already present in the ground, so EPA did not perform additional studies. She notes that the nutritive value hasn’t been completed but it’s used as a foliar application not for roots. “Management systems can be used to build the Si in the soil to improve the plant’s resistance to disease and reducing the likelihood of needing a pesticide treatment. However, when an infestation occurs and a treatment is required, ASC should be an available option for organic farmers.”
8. **Matthew Weaver** of Genoa opposes the relisting of APS for both the insecticide and the plant disease control uses. Form Comment.

## Sodium Carbonate Peroxyhydrate

Support Renewed Listing: 1 individual

Oppose Renewed Listing: 2 organizations (Cornucopia, Beyond Pesticides), 3 individuals

1. **Cornucopia Institute** does not support the renewed listing of SCP as its use for aquatic plants needs to be further evaluated, SCP is harmful to the environment as it has broad spectrum abilities; alternatives are available for the control of algae including rice straw, barley straw,

allelopathic plants, and herbivorous fish; SCP does not fit any OFPA categories, and international standards do not allow SCP in crop production.

2. **Terry Shistar of Beyond Pesticides** “Beyond Pesticides urges the Crops Subcommittee to oppose the relisting of sodium carbonate peroxyhydrate (SCP) as an algaecide. It has been found by the NOSB in its 2007 recommendation not to meet the OFPA criteria of essentiality, compatibility with organic production, and no impacts on human health and the environment. It was added to the National List as an alternative to copper sulfate in rice, but there is no evidence that it has been adopted or is effective for that use. Under the new sunset process directed by the NOP, unless the CS proposes not to relist sodium carbonate peroxyhydrate, it may not come before the full board for a vote on future use, as required by the sunset policy of the Organic Foods Production Act (OFPA) and, historically, the Board.”
3. **Brown, Susan** opposes the relisting of SCP as it does not meet the OFPA criteria of essentiality, compatibility with organic production and no impacts on human health and the environment. Form comment from Beyond Pesticides
4. **Francis Dunham** “Sodium carbonate peroxyhydrate may have adverse effects on human health and soils and may also be toxic to pollinators. I oppose its use in organic production and ask that it not be relisted. Improvement of soils is a critical mission of organic farming. Pollinators are already suffering substantial declines; risks to them must be diminished.”
5. **Robert Larose** of East Hartford, CT supports the continued use of SCP as it has been successfully used in CA Rice Production on over 100,000 acres since its introduction. “It has provided better control of algae and its breakdown components of water and oxygen are a needed relief from elemental copper accumulation associated with copper based chemistries... The approval of Sodium carbonate peroxyhydrate has continued to be one of the major impacts in reducing the number and use of heavy metal products used in our waterways that leave behind elemental heavy metal copper residuals that can and do affect the environment in a detrimental way.” Appears to be associated with BioSafe Systems business which is a producer.
6. **Allan Peterson** As a substance "highly toxic to bees," and possibly birds, this substance should be delisted. The crisis in bee populations as well as the potential for buildup in soils is clear indication of its toxicity. It should not be relisted.

## Sulfurous Acid

Support the relisting: 6 organizations (CCOF, Driscoll Strawberry Associates, Reiter Bro. Inc, Berrymex, Grimmway Farm/Cal-Organic Farms, Garrett Farms); 1 individual; 1 petitioner

Oppose the relisting: 2 organizations (Cornucopia, Beyond Pesticides), 3 individuals

1. **CCOF** supports the relisting of sulfurous acid, as a “tool organic growers can use to counteract soil salinity and alkalinity. Sulfurous acid does not act as a sulfate fertilizer because the sulfate is present only at a parts per million level while sulfur is a secondary level nutrient (along with calcium and magnesium) that is needed at much higher quantities to influence plant growth. Organic growers do not need a synthetic source of sulfate. There are plenty of allowed sources of sulfate in gypsum and compost products. Sulfurous acid is a water

treatment for poor quality irrigation waters; it is not a remedy for unsustainable farming practices. The soil and ecological conditions resulting in the build-up of hydrogen sulfite, sulfate, or other products of sulfurous acid would only happen in anaerobic soils with complete water saturation. This is unlikely to happen in the western portion of the United States because farmers here are very familiar with the conditions under which irrigation is needed. Excess irrigation would cut into a farmer's bottom line and destroy crops." They also say that it increases the sustainability of agricultural soils in alkaline environments as its use keeps soil pore space open to the air and water helping to leach away toxic salts.

2. **Cornucopia Institute** does not support the relisting of sulfurous acid on the List and urges the board to by prepare a formal motion for the next Board meeting. "Due to the new NOP sunset rules, the only way the Crops Subcommittee can ensure that the Board conducts a full review of sulfurous acid is to vote in favor of a proposal for removal." Sulfurous acid should be removed because: the initial approval was based on insufficient review which does not reference any technical report; alternatives are available that can reduce pH of the soil; specific uses must be delineated as well as conditions that it can be used under; and international standards do not allow sulfurous acid in crop production."
3. **Terry Shistar of Beyond Pesticides** "Beyond Pesticides urges the Crops Subcommittee to oppose the relisting of sulfurous acid to correct alkalinity in soil that has accumulated carbonates and bicarbonates through irrigation water in more arid regions. There are potential adverse impacts that have not been evaluated by the NOSB. Furthermore, under the new sunset process announced by the NOP, unless the Crops Subcommittee (CS) proposes not to relist sulfurous acid, it will not be reviewed and considered by the full board as required by OFPA."
4. **Driscoll Strawberry Associates** supports the relisting of sulfurous acid. Currently they are the world's largest distributor of fresh strawberries, blueberries, raspberries and blackberries. Many of their growers in US, Mexico and Chile are small family farms that depend on sulfur burner technology. "Currently we estimate that 15-20 of our growers are utilizing sulfur burners to treat high pH water and soil on a significant portion of their 13,000 certified organic acres...Treating irrigation water with sulfurous acid effectively reduces the pH of the water and soil by counteracting soil salinity and alkalinity in order to increase acidity. This is particularly important to blueberry growers and all farmers who grow in high alkaline conditions." Benefits include enhanced water penetration and irrigation efficiency, improved nutrient availability and uptake which reduces fertilizer applications; increased plant health which decreases pest pressure; and improved yields.
5. **Terry Gong** – the original petitioner supports relisting of sulfurous acid. While the on-site process of oxidizing 99.9% element sulfur (S) into sulfur dioxide (SO<sub>2</sub>), and combining it with water (H<sub>2</sub>O) to form sulfurous acid (H<sub>2</sub>SO<sub>3</sub>), in the context of the USDA-NOP, is categorized as "the on-site manufacture of a synthetic material that is currently allowed for organic crop production and subject to sunset review every 5 years." The petitioner provides an indepth discussion on the chemistry induced by volcanism--a natural on-going primordial process that maintains the pH of our plant's ecosystems and how life is supported—which is emulated by production of sulfurous acid.
6. **Darren Abernathy, is the Production Manager for Reiter Brother's Inc** based in Oxnard CA. The family owned company produces fresh strawberries, raspberries, blueberries and blackberries, and heavily weighted towards organic. "I am writing you to request that you leave sulfurous acid

on the list of approved materials for organic production. The use of sulfur burners to produce sulfurous acid in the organic berry industry is vital to producing a top quality organic product for our consumers.” He used to use citric acid which they found ineffective and hard to procure from reputable, stable sources. “Since using sulfurous acid, we have also experienced fewer issues with disease and pests because we are growing a healthier plant. Sulfurous acid benefits our plants and soils, it’s not a fertilizer, but it allows our fertilizer to be more effective by improving our water and soil quality.”

7. **Susan Abernathy** of Pinole, CA commented twice and supports the use of sulfurous acid “Sulfurous acid has many beneficial effects on soil health and fertility. A report submitted in 2008 summarizes its use and properties well:  
<http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5057561>...” Alternatives to sulfurous acid include soil sulfur and gypsum, but these materials can be less effective, and they don't simulate the effects of natural rainfall like sulfurous acid does.”
8. **Juan Beltran of Berrymex** in Mexico submitted a comment. Berrymex is located in Jalisco, Baja California, and Michoacan, cultivating strawberries, raspberries, black berries and blueberries. Prior to sulfurous acid, they used citric acid, which did not provide good yields for organic berries. In total they have 4 sulfur burners which improve the soil structure, make them more porous, improve water retention and improve production quality. They say sulfur burners have been essential for a better fertility balance in the soils. Signed by **Juan Beltran, Salvador Arias, William Manuel, Duvian Glick, Dante Guiteirez Medina, and Rafael Felix Urbina**. 7 copies of the same letter.
9. **Davis, Gerald of Grimmway Farms/Cal-Organic Farms** is a California based organic farm producing organic vegetables in six counties in the state. Previously they relied on elemental sulfur which was not effective in lowering soil pH, instead just produced high levels of sulfate. They provided actual soil test results from two farms that demonstrated the effects of sulfurous acid in lowering pH, declining limestone content, and declining exchangeable sodium and percent based saturation of sodium. “In arid regions where leaching rainfall rarely occurs, abundant supplies of sulfate ion in the soil are always present...hence the argument that sulfurous acid is intended to supply sulfate as a crop nutrient is ludicrous. Western growers need SA as a water treatment for excess bicarbonates but do not need the sulfate ion that comes with its use...” He proposes the need for a simple statement to address the question of sulfite ion accumulation in crop soils, but sulfurous acid is a necessary tool for sustainability of arid agriculture.
10. **Morgan Tittle of Garret Farms** in California submitted a comment. They grow berries on 180 acres, 7.5 of which is organic, they plan to increase either organic acreage by 14 acres in 2015. They currently use two sulfur burners for all berries. “Prior to the sulfur burners we had to use some type of liquid acid. Many growers even used sulfuric acid, which we all know is very corrosive and very dangerous to apply and store...” They view sulfurous acid and sulfur burners as essential tools for maintaining soil structure and health.
11. **Brown, Susan** opposes the relisting of sulfurous acid as there are potential adverse impacts that have not been evaluated by the NOSB. Form comment from Beyond Pesticides

12. **Francis Dunham:** Sulfurous acid may weaken or kill important soil microbes. Other harmful environmental effects and better methods of pH regulation need to be studied and evaluated before this substance is considered. I oppose its use in organic production and ask that it not be relisted.
13. **Allan Peterson** “Evidence that sulfurous acid endangers soil health. It should not be allowed in organic food production.”

## Laminarin

Support classification as nonsynthetic: 0

Reject classification: 4 organizations (Cornucopia, Beyond Pesticides, OMRI), 3 individuals

Raises questions: 1 organization (PCO)

1. **Cornucopia Institute** rejects the motion to classify laminarin as non-synthetic: “Laminarin is extracted with both sulfuric acid and sodium hydroxide, leaving residues of those synthetics in the final product. Although the source of laminarin, seaweed, is non-synthetic, the extraction process results in a material that should be classified as synthetic. This determination is necessary so that the petitioned material, laminarin, can be reviewed by the full Board.” Their rationale is that synthetic substances are used in the manufacture of laminarin, NOSB and NOP guidelines indicate that laminarin is synthetics; and the NOSB is responsible for determining whether a material is synthetic or not.
2. **Terry Shistar of Beyond Pesticides** “Beyond Pesticides supports the minority view that laminarin must be classified as a synthetic substance if it is extracted as described in the petition. In the case of laminarin, sulfuric acid is added during the extraction process. It is neutralized with sodium hydroxide in a later step. While the reaction of sulfuric acid and sodium hydroxide neutralizes the acid, thus “removing” that effect, it does not remove the sulfuric acid. Sodium is also added. The sulfur, as sodium sulfate, remains. No later step in the process removes the sodium sulfate, and the majority does not claim it does. It is the remaining material at levels that are of technical concern or that have technical effect that requires the classification of this material as a synthetic. Removal is not the same thing as eliminating the function while creating an added substance in the material.”
3. **Organic Materials Review Institute.** “OMRI considers the acid-base extraction process described in the petition to result in a nonsynthetic aquatic plant extract, and therefore laminarin would be permitted as an active ingredient in a pesticide. We do not concur, however, with the last point made by the majority opinion about the status of the acid and base substances used. Sodium hydroxide does in fact Page 2 of 2 neutralize sulfuric acid; however, it does so by reacting together to produce water and sodium sulfate. Therefore, sodium sulfate, a synthetic, is still apparently present in the final laminarin extract after manufacturing is complete (although in small quantities). OMRI would consider the resulting sodium sulfate to need additional review for compliance to the organic regulations. Because laminarin is being petitioned as a pesticide, we would evaluate the sodium sulfate as an inert ingredient, just as we



- evaluate sodium hydroxide in aquatic plant extracts (when used for the active pesticidal ingredient, cytokinins).” **Pennsylvania Certified Organic** “PCO agrees that listings on the National List are not necessary to implement the decision that this is a non-synthetic substance. As mentioned above, allowed non-synthetic substances do not belong on the National List. If the proposal passes, it would be helpful if the NOSB could provide some guidance... regarding the expectations for the depth of review for laminarin.”
4. **Vivian Valti Burgess** supports the comments submitted by Beyond Pesticides that it is synthetic because sulfuric acid is added but not removed.
  5. **Dunham, Francis** of Gulf Breeze, FL says :”Because sodium sulfate remains after processing with sulfuric acid, this substance cannot be considered non-synthetic. The new rules improperly prejudice the process in favor of synthetics, so it is critical that no new synthetics be listed”
  6. **Peterson, Allan** of Gulf Breeze, FL says “Laminarin Is this substance synthetic. It would appear so, since sulfuric acid is added but not removed. Sodium hydroxide is then added to neutralize sulfuric acid, but the sodium sulfate produced by the neutralization reaction is not removed. If laminarin is classified as nonsynthetic, the NOSB will not be able to decide on whether to allow its use on the amplification of plant defensive chemicals that is its mode of action.”

## Vinasse

**Support the proposal: 3 organizations (CCOF, OMRI, PCO)**

**Reject the proposal: 3 organizations (Cornucopia, Beyond Pesticides, NOC); 3 individuals**

1. **CCOF** agrees with the majority position that some forms of vinasse are non-synthetic while others may have synthetic additives. We don’t believe that vinasse as a generic term should be regulate by being on the National List. Any restriction or annotations on generic vinasse should be in NOP guidance 5034-1. Therefore they support the proposal.
2. **Cornucopia Institute** rejects the motion to classify vinasse as non-synthetic and reject the proposal to amend the Guidance on Materials. “We urge the Board to request that the Crops Subcommittee draft a motion that defines the distinctions between the synthetic and non-synthetic forms of vinasse. This motion should be independent of NOP’s draft guidance. A minority opinion, to list vinasse on the National List at both §205.601 and §205.602, represents a compromise position.” Their rationale is that the use of vinasse must be regulated through the List process not through amending NOP 5033 and 5034 the draft guidance from NOP; the NOSB is responsible for determining whether a material is synthetic or not; some types of vinasse are synthetic; and synthetic forms of vinasse must be reviewed by the full NOSB for possible addition to the List.
3. **Terry Shistar of Beyond Pesticides** “We urge the NOSB to (i) send the classification question back to the CS for action as described above, (ii) ask the subcommittee to identify the synthetic form of vinasse based on criteria that distinguish synthetic from nonsynthetic vinasse, and (iii)

request that the subcommittee complete a review of synthetic vinasse to determine compliance with the checklist criteria under OFPA and propose a 205.601 recommendation.”

4. **National Organic Coalition** comments that the main issue arising with both vinasse and laminarin is the classification as synthetic or non-synthetic. “NOC observes that the need for the Subcommittee to address the classification issue as the primary focus for two different materials is indicative of the strong need for a clearly defined policy on Classification of Materials. We note that the lack of clarity on this point has effects throughout the entire industry—a situation that we contend is not in line with the NOP’s stated goal of using “Sound and Sensible” regulatory procedures.”
5. **Organic Materials Review Institute** considers vinasse a nonsynthetic ingredient based on the manufacturing process. “OMRI supports the recommendation to add information to the draft NOP Materials List about vinasse as a nonsynthetic, allowed ingredient in organic production, as long as it does not contain prohibited additives, or is fortified with synthetic nitrogen. We concur that it does not belong on 205.602.”
6. **Pennsylvania Certified Organic** supports the majority position to classify vinasse as non-synthetic. They also support the majority position that listings on that NL are not necessary to implement this decision. Allowed non-synthetic substances do not belong on the National List. “PCO strongly opposes the listings proposed by the minority position because they are unnecessary and overcomplicate the situation. The proposed listings essentially prohibit §205.601 (allowed synthetics) and §205.602 (prohibited non-synthetics). If the minority position is concerned that certifiers would overlook synthetic additives, be assured that certifiers have a common current practice of inquiring about additional ingredients within a non-synthetic material. If synthetic ingredients are added to a non-synthetic material, the entire substance is classified as synthetic, and the synthetic components must be reviewed individually for compliance. PCO provided comments to the NOP regarding this matter during the comment period for the draft guidance on Classification of Materials. This guidance document is the appropriate place for explaining this general material review practice, instead of individual lengthy listings on the National List”
7. **Vivian Valtri Burgess** of Granville, VT supports the comments submitted by Terry
8. **Dunham, Frances** “Until NOSB determines whether Vinasse is synthetic, as OFPA requires, it should not be listed as nonsynthetic. NOSB must distinguish between the synthetic and non-synthetic forms before any action can be taken.”
9. **Peterson, Allan** of Gulf Breeze, FL “I am uncomfortable with any reclassification of a synthetic as natural, especially for a substance that has both synthetic and non-synthetic forms. NOSB need to make a clarification. NOB is not the forum for that decision.”

## Magnesium Oxide-

Support the proposal to list: 0

Oppose the proposal to list: 2 organizations (Cornucopia, Beyond Pesticides), 5 individuals

1. **Cornucopia Institute** rejects the petition to add magnesium oxide to the National List as it has not been independently researched since 2007, thus it is seven years out of date. Also

the review was actually for magnesium hydroxide and not magnesium oxide, even further reason for a new TR. In the future research needs to assess essentiality in organic production as well as environmental impacts. Finally, this may be the only opportunity for a vote by the full board due to changes in sunset policy.

2. **Terry Shistar of Beyond Pesticides:** Beyond Pesticides opposes the Crops Subcommittee proposal to list magnesium oxide only to control the viscosity of a clay suspension agent for natural humates. We support the minority position to list with a 5-year expiration date annotation.
3. **Brown, Susan** opposing the proposal to list, supporting the minority position to list with a 5-year expiration. Specifically supports the wording of Beyond Pesticides.
4. **Burgess, Vivian** opposing the proposal to list, supporting the minority position to list with a 5-year expiration
5. **Dunham, Frances** of Gulf Breeze, FL “Magnesium Oxide is a synthetic substance which, if approved, may not be removed from listing even if new research indicates harmful effects to human health and the environment. I oppose its use in organic production. The new rules improperly prejudice the process in favor of synthetics, so it is critical that no new synthetics be listed”
6. **Fink, Brian** opposing the proposal to list, supporting the minority position to list with a 5-year expiration
7. **Peterson, Allan** of Gulf Breeze FL “The leniency in allowing additional applications of chemicals that industry suggests, is too dangerous. When we discover harmful effects later, it's too late. Deny this petition.”

## Miscellaneous

1. **National Organic Coalition** on Inerts: “We understand that there will be an update of the progress on Inerts review by NOP/NOSB. NOC is greatly disappointed that USDA has not utilized the expertise of the board member that has worked on this issue extensively, helped craft the NOSB recommendation (passed unanimously) to develop a thoughtful process, and was willing to commit time and resources to ensure a legitimate review of so-called inert ingredients in the spirit of organic integrity. The Board’s plan to lump review – a tool that is not readily accepted by those of us demanding individual review of materials – was a good solution to a potentially massive undertaking, and could have paved the way for other reviews of similar scope. Instead, the review of inerts has languished during his term. Avoiding inerts review may significantly negatively affect perception of the organic label and its ability to provide non-toxic alternatives in food and agriculture systems.
2. **National Organic Coalition** on Hydroponics “Until a clear definition has been provided by the NOP, certifiers should not be allowed to certify hydroponic systems. Certifiers need to be directed as to which systems may be certified, and which do not meet the criteria and are not eligible for organic certification. NOC urges the NOP to write “NOP Instruction to Certifiers” that leads to Rulemaking. The instruction should include clear criteria that follow the NOSB 2010 recommendation, and adhere to the definition of organic production presented in the Rule.”

3. **Brown, Nathan** of Belgrade MT “My name is Nathan Brown and I am the chairman of the Montana Organic Association. MOA would like to sign on to the National Organic Coalition's position on hydroponics in organic production. We feel hydroponics has no place in certified organic production.
4. **Mitchell, Susan** of East Lyme “As a young small-scale organic grower, I do the best I can to support myself solely through producing vegetables. One way to more effectively manage my time is in the use of biodegradable plastic mulch. Having worked on farms using this type I mulch, I have seen firsthand the benefits to producers in terms of labor savings in addition to effective weed control. I know that use of biodegradable plastic mulch has been on the docket for the NOSB for at least one year and I would very much like to encourage the board to issue a decision regarding its use, as quickly as possible.
5. **Monroe, Gloria** of Paris TN “I am a 58 year old woman , I have 2 Grand Children ages 8 and 10, I am extremely concerned how their health will be impacted in the years to come if the chemicals that are being sprayed on crops continue, along with seeds that have a chemical already in them when planted! I could not believe that seeds were being treated with chemicals to help reduce pest problems, if the seed had the chemical in it the plant will also have the chemical , thus the vegetable or fruit will also have the chemical! Result being the chemical will enter our bloodstream! I am shocked that the United States Ag. Dept would even consider allowing such a practice! There are far better ways of dealing with pests than having chemically treated seeds! I am extremely concerned in the rising rates of Autism in this country! Per the CDC report from 2012 to 2013 there was a 1.16% increase! This has to be caused by something! I believe it is from a combination of the chemicals that are being used on our food supply, first the plants and now seeds are being treated with chemicals, than cattle, chickens etc. eat the crops laden with pesticides and then we eat the meat from the cattle, a vicious cycle is now activated into our bloodstreams, not to mention the fruits, and vegetables we eat that have been literally raised in chemicals! The only way to have this atrocious amount of chemicals not entering the food chain is by Organic Standards! DDT was banned in 1972 after it was discovered how dangerous it was, sadly it is still permitted to be sold to foreign countries who are importing a lot of food products to the United States! So the horrific chemical can continue be in our bloodstream from any product it was used on in that country! What a double edged sword we have there!”