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Chief Standards Development and Review Branch
National Organic Program
Transportation and Marketing Programs
USDA-AMS-TMP-NOP
1400 Independence Avenue, SW
Room 4008 South, Ag Stop 0268
Washington, DC 20250

Re: Docket Number AMS-NOP-10-0021: Apiculture

Oregon Tilth Certified Organic (OTCO) is a nonprofit research and education membership organization dedicated to biologically sound and socially equitable agriculture. Oregon Tilth offers educational events throughout the state of Oregon and provides organic certification services to organic growers, processors, and handlers internationally.

An NOP accredited certifier since 2002, OTCO currently certifies 740 farms and ranches in over 35 states, affording us a broad perspective of current practices and challenges faced by organic producers, as well as the effect that the anticipated successes and challenges this discussion topic will have upon them.

Apiculture:

Oregon Tilth strongly urges that the NOSB prioritize consideration and wholesale adoption of the 2009 Organic Apiculture Guidance Document, Final Draft, prepared by the Accredited Certifiers Association.

The demand for organic apiculture is very apparent. It is also clear that the lack of regulatory language within the NOP rule that addresses the specific needs of apiculture is creating confusion in a blossoming new portion of the organic industry. Products are being produced under widely varying standards to be marked in the US as “organic” honey. The ACA document, drafted by a wide array of parties, including beekeepers, foreign and domestic ACAs, and IOIA accredited inspectors; is a well-constructed, workable proposal and should be adopted with all possible speed.

The time is long past due for action on this issue. Organic honey is widely demanded by consumers, and is a desired endeavor of many certified producers. At the same time, some domestic and particularly foreign ACAs are certifying and selling honey, but using widely differing criteria for such key issues as the size of forage zone and whether or not to permit the use of synthetic material treatments. Many of these treatments are not included on this national list at this time, but allowed in the EU and Canada. Examples of



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these treatments are thymol, oxalic and formic acid. A crucial part of the adoption organic standards by the NOP must be the listing of a number of these materials for use in apiculture.

OTCO supports the new ACA proposed standards over the 2001 NOSB recommendation due to a variety of reasons. The intervening years have highlighted a number of obstacles with the original recommendation-not only for potential producers but also for international equivalency. Most notably, the 4 mile forage zone excluding all non-organic production, that in practice is particularly difficult to enforce and in reality is very difficult to find. With the explosive world-wide growth of honey production to EU standards and the adoption of the Canadian Organic Standards, these regulations have become the de-facto regulation, and many producers, particularly in the humid tropics, (where the vast amount of organic honey is produced) have already modeled their practices around the EU and now the Canadian standards.

The ACA proposal was drafted with an eye towards relative harmony with these standards. In harmony with the EU and Canadian Standards, the ACA recommendation requires a 3 Km (1.8 mile) forage zone, where all production must be managed under organic production methods. In addition the recommendation requires an additional 2.2 mile “surveillance zone,” that must be monitored as part of the applicants OSP, and must not contain features that pose exceptional risk, such as landfills, GMO crops, etc. This provision would give those ACAs certifying apiculture projects additional leverage to require that apiaries be moved or denied based on perceived threats to organic integrity. We feel that is a good compromise between the original 2001 NOSB position and the current global regulatory and production conditions.

The ACA document also makes important departures from the original NOSB recommendation with respect further defining to the processes required to transition of hive from conventional to organic production. These changes include extending the process up to 1 year, in harmony with EU and Canadian Organic Standards, and limiting the number of bees that may be purchased from conventional sources, thereby encouraging the growth of a market for organic bees with genetics favoring allowed production methods. The NOSB and the NOP should not delay further on this issue. Consumers, Producers and ACAs need strong, workable regulations now!

Thank you in advance for making this a priority and providing solutions for the industry. Oregon Tilth looks forward to being involved in future discussions and process.