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March 18, 2013

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2648-So, Ag Stop 0268
Washington, DC 20250-0268

RE: Docket: AMS-NOP-12-0070
NOSB Crops Sub-Committee
Petitioned Material Proposal Oxytetracycline

I. Introduction.

Oregon Tilth certifies over 2500 acres of organic apples and pears from Midwest states to California and the Pacific North West. For these organic orchardists and numerous others, the key control for fire blight is oxytetracycline and streptomycin. Loss of these crucial tools of last resort would deeply impair the organic tree fruit industry leaving thousands of acres vulnerable. The result will be the significant loss of apple and pear acres under organic management. Oregon Tilth supports the Crops Subcommittee proposal to extend the expiration date for tetracycline to October 21, 2016.

Oregon Tilth appreciates the difficult task this presents for the National Organic Standards Board (NOSB). On the one hand, organic apple and pear producers require more time to establish effective controls for fire blight. On the other hand, consumers are very concerned about allowing antibiotics in organic agriculture. Oregon Tilth trusts that the NOSB will act pragmatically to sustain organic apple and pear production by voting to extend the expiration of tetracycline.

II. What is gained and what is lost.

The premature sunset of tetracycline from the National List will result in a significant reduction of organic apples and pears under organic management. Organic farmers will forgo organic certification before risking their orchards. When surveyed, 82% of organic orchardists indicated that they would not be able to control fire blight in a high infection risk year without antibiotics. In a 2012 organic grower survey, 93 percent of growers said they would reduce organic apple or pear production or exit it entirely (surrender organic certification) with the loss of antibiotics without proven consistent alternatives because of the high potential to lose entire orchards to fire blight. New orchards cost $12,000-20,000 to establish per acre. It also takes five to seven years to bring an organic orchard to maturity, making it economically devastating for farmers to lose an orchard to disease.

Conventional apple and pear production will continue to use antibiotics such as tetracycline. WSU extension agent Timothy J. Smith noted, “oxytetracycline is the only reasonably effective product available to most Pacific Northwest USA pear and apple growers.” If organic orchardists surrender certification in order to preserve their orchards then the net total antibiotic use in US apple and pear production will remain unchanged.

III. Antibiotics are the crucial tools of last resort for fire blight control.

There are numerous misconceptions regarding antibiotic use under current organic practices. First, the use of antibiotics by organic apple and pear growers is not routine. Antibiotics are tools of last resort. The National Organic Standards prohibit producers from relying solely on the use of material inputs for any disease or pest problem. Fire blight is no different. Furthermore, antibiotics are a tool of last resort and are not used every year. In David Granatsteins’s 2011 letter to the NOSB he said: “Apple and pear orchards in the Pacific Northwest are at risk from this disease, which is even more challenging in other parts of the country. A serious infection does not occur every year in every orchard, but constant vigilance is required.”

IV. Silver Lining.

There is real progress in developing tools for controlling fire blight in apples and pears that do not rely on antibiotics. Organic growers fully realize that antibiotics will be prohibited in the near future. New resistant rootstocks have been developed and are estimated to be commercially available in 2014. New materials like Blossom Protect® show promising results in trials. Other tools such as predictive models continue to be more affective. Combined, these tools provide considerable expectations that fire blight can be effectively and consistently controlled without antibiotics. But additional time is needed. These efforts to find effective alternatives are moving as fast as possible for a perennial tree system with limited abilities for multiple trials per year.

V. Conclusion.

Antibiotics will be removed from the National List in the near future. It is only a matter of when. Oregon Tilth urges the NOSB to consider a sunset date that is based on realistic expectations for current research to draw statistically significant conclusions. The commercial availability of these solutions must also be considered. OTCO does not support the inclusion of annotations that reiterate existing standards. We encourage NOSB to avoid amending 205.206 or the National List with redundant or prescriptive annotations.

The Census of Agriculture – Organic Production Survey (2008) states that the United States harvested 19,312 acres of organic apples in 2008 for a collective value of $136,122,249. If effective tools are not available and fire blight pressure threatens organic orchards, farmers will forgo organic certification before risking their orchards. And under conventional management, antibiotic use will no longer be restricted as a control of last resort. NOSB has the responsibility of providing growers with adequate tools that allow organic production to remain viable. OTCO encourages the NOSB to be pragmatic and extend the sunset date for tetracycline for use in organic apple and pear production to 2016 or later depending on the available research and fact based considerations.