



CCOF

Organic Certification

Education & Outreach

Political Advocacy

Promotion

September 30, 2013

Ms. Ann Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave., SW.
Room 2646-So., Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-13-0049

RE: NOSB Crops Subcommittee Proposal Regarding the Petitioned Material Streptomycin

Dear Ms. Arsenault and NOSB,

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on the Crops Subcommittee proposal to extend the expiration date of streptomycin. CCOF is absolutely committed to ending the use of antibiotics in organic fruit production. However, we feel that a longer period is necessary to phase out use of streptomycin than the current 2014 expiration date.

This issue affects CCOF-certified growers and handlers. While the proposal regards use of streptomycin in both apples and pears, we find this material to be mainly used in pear production. We certify 69 pear growers and 25 asian pear growers (with some overlap). While our clients do not all use this material, and those that have it on their OSPs use it in conjunction with other cultural and biological practices only when conditions favoring fire blight are present, 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 removal of streptomycin from organic agriculture, but want to see it done in a way that minimizes disruption to the fruit industry.

Given the lengthy process of continuing research in varying locations and seasons that may provide alternate approaches to fire blight control, allowing for registration of new materials, and conducting grower education and outreach, we support the majority position to extend the expiration date for the use of streptomycin to October 21, 2017.

We support the subcommittee's call for more research on alternatives. We also want to express our strong support for the subcommittee resolution that calls for growers and certifiers to prepare for the expiration by increasing alternate practices. CCOF is committed to communicating information to our members on the phase-out of streptomycin and developments in preventative practices and other alternative controls.

We are committed to phasing out the use of antibiotics in apple and pear production. We believe that extending the date of the phase-out minimizes likelihood of producers switching to conventional



management of their orchards so they don't lose their trees.

Again, CCOF thanks you for the opportunity to provide our comments, and the Crops Subcommittee for their time and effort on this subject. We are available to answer any questions you might have about our comments.

Sincerely,



Cathy Calfo, Executive Director/CEO
CCOF, Inc



Jake Lewin, Chief Certification Officer
CCOF Certification Services, LLC

CCOF is a nonprofit organization founded in 1973. It is one of the oldest and largest organic certification agencies in North America. CCOF serves as a trade association for more than 2,600 certified organic producers and 300 supporting members, in 38 states and three countries.

