



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

Submitted via www.regulations.gov

March 19, 2013

RE: NOSB Crops Subcommittee Agenda items:

- Petitioned material proposal: Oxytetracycline

MOSA summary statement on extending the use of Oxytetracycline:

We believe that the proposal to extend the expiration date to 2016 doesn't go far enough in allowing time for the development of equivalent alternatives for fireblight control. We recommend that the subcommittee consider grower input and extend the date beyond 2016.

Dear NOSB members:

Thank you for the opportunity to provide comments on the proposal to extend the use of Oxytetracycline to 2016.

The proposed expiration date of October 21, 2016 to remove oxytetracycline from the National List of Allowed Synthetics does not allow enough time to develop equivalent alternatives for fireblight control. Fireblight is one of the most destructive tree fruit diseases in the United States. Without alternatives, organic apple production would be put at an economic disadvantage due to the widespread impact of this disease.

. The following comments outline the advantages of extending the expiration date and address the concerns raised by the Minority Position.

Much of the discussion in the NOSB Petition focuses on the negative environmental and human health impacts of the use of oxytetracycline in orchards. Although the Majority Position does recognize concerns related to the non-target effects, much of these concerns can greatly be alleviated through management. The reason oxytetracycline

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was originally allowed by the National Organic Standards was because it is a critical tool in an integrated pest management program. The National Organic Standards mandates the judicious use of pesticides by requiring physical, preventative, cultural, and mechanical control for fireblight first. Certifiers have the responsibility to verify that these measures have failed before a producer can use oxytetracycline. In our experience, these restrictions make use of oxytetracycline a rare occurrence.

Another concern in the Crop Subcommittee Proposal is that the use of synthetic antibiotics goes against the “spirit” of organic food production. Most producers agree with this philosophy and would seek alternatives if they were available. The research and development of alternative control measures will take time. Scientific research citations in the Proposal dated as far back as 1962 (Keil and Wilson), yet fireblight is still a major disease in pome fruit. For solutions to be developed, industry and tree fruit specialists need to review the scientific literature and conduct basic and applied research, and develop management systems that will be compliant with the National Organic Standards. This is unlikely to be accomplished by 2016.

MOSA has an interest in maintaining the economic viability and growth of the organic industry. Yields of organic tree fruits would significantly decline without effective fireblight control measures. This would reduce the shelf space of US grown apples and make South American apple production more competitive. If organic markets are not kept secure for U.S. producers, then production may drastically decline and may not meet consumer demand. Fruits and vegetables are identified by consumers as the most preferred type of organic products. Of all temperate fruits, apples are the most consumed, and with their decreased presence in the marketplace the entire organic industry will be negatively impacted.

Harry Hoch drafted comments about oxytetracycline. He is the husband of Jackie Hoch, and they run the Hoch Orchard together. Jackie is also the president of the Organic Tree Fruits Association. Their comments point out the insufficient timeframe to develop alternatives to oxytetracycline. Their background as fruit growers give a practical and realistic perspective on phasing out oxytetracycline. Specifically, their comments meritoriously outline why oxytetracycline should not be phased out until 2023. For those who are on the periphery of the organic tree fruit industry, I would highly encourage that the Hoch comments are read and considered.

The use of oxytetracycline and alternatives to oxytetracycline is a complex issue facing the organic industry. Although the environmental and human health aspects of antibiotics use in tree fruits have been exhaustively researched, the marketing,

economic, and sustainability facets of organic tree fruit production has not been fully addressed. Because addressing these issues will take considerable time, MOSA asks the committee to consider a longer phasing out period for oxytetracycline.

Thank you for your work on this issue.

Respectfully submitted,

The MOSA Certification Team