



The Organic Specialists

March 19, 2013

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

Docket: AMS-NOP-12-0070

RE: Crops Subcommittee – Oxytetracycline

Dear Members of the National Organic Standards Board,

Thank you for your service and for consideration of the needs of all stakeholders regarding the proposal from the Crops Subcommittee to extend the use of tetracycline for fire blight control in apples and pears until October 21, 2016. Wolf, DiMatteo + Associates (WDA) supports the Crops Subcommittee majority opinion to extend the allowance and also its resolution to phase out the use of tetracycline in organic crop production. However, WDA agrees with the Organic Trade Association that an expiration date of 2017 is reasonable and will support alternative product registration and availability, commercial scale-up of use of alternatives and build operator confidence through experience with alternative controls to fire blight.

WDA believes that both a realistic expiration date and the current research and use of alternatives will lead to the phase out of tetracycline in organic apple and pear production without a significant loss of production for farmers or market availability for consumers. Much of the information that has been submitted in support of an immediate expiration of the use of tetracycline, in our opinion, is exaggerated both in terms on the dangers to human, farm worker and soil health, as well as the amount and frequency of tetracycline that is used in organic apple and pear orchards. We do agree that effective non-antibiotic alternatives for fire blight are a critical and important improvement in organic production and can be an example for non-organic orchardists. Therefore WDA urges NOSB to pass a recommendation that supports a time frame that will allow the greatest number of organic farmers to successfully transition to non-antibiotic management of fire blight.

We deliver the strategic expertise to help organic, socially, and environmentally responsible products and projects reach their full potential—and flourish.

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Keep up your efforts to develop balanced, pragmatic recommendations and come to decisions that stimulate both growth and integrity within the organic sector. WDA appreciates the opportunity to comment.

Sincerely,

Bill Wolf, Katherine DiMatteo and Sandy Mays
Partners

The partners and associates of Wolf, DiMatteo + Associates have over 100 years of combined experience in the organic sector. We have served hundreds of farms and businesses with their organic production systems and regulatory compliance, both nationally and internationally. We have been involved in the founding of several key organic organizations including the Organic Trade Association, Organic Materials Review Institute and the Organic Center. We are fiercely committed to continual improvement and to provide our clients and the organic sector with the tools to advance organic, environmental, and social practices.