



106 School Street, Suite 201 • Spring Mills, PA 16875 • (814) 422-0251 • pco@paorganic.org

October 1, 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: AMS-NOP-13-0049

Comments to the NOSB Crops Subcommittee regarding Streptomycin

Dear Ms. Arsenault:

Pennsylvania Certified Organic (PCO) welcomes the opportunity to provide comments to the National Organic Standards Board (NOSB) regarding the subcommittee proposals to be discussed at the upcoming business meeting. PCO is an NOP-accredited certifying agent that certifies more than 700 operations, including around 165 crops operations, 385 livestock operations, 120 processor/handler operations and various combinations of these categories.

Streptomycin

The Crops Subcommittee has proposed to revise the annotation for streptomycin at §205.601(i)(11) by removing the existing expiration date of October 21, 2014 and replacing it with a new one of October 21, 2017, for both apples and pears. If passed, the listing would read (underline added to indicate new text):

§205.601(i)(11) Streptomycin, for fire blight control in apples and pears only until October 21, 2017.

PCO supports the subcommittee's majority position to extend the expiration date for streptomycin until October 21, 2017 because effective natural alternative management tools for fire blight do not currently exist. Furthermore, PCO would support an even longer extension, such as reinstating the sunset process for this material, to ensure that

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enough research and education of alternatives is available to organic apple and pear producers. PCO also supports the resolution presented by the subcommittee that commits the organic community to phase out this material, provided that the step down is in a gradual fashion and allows operators to transition their production practices to utilize alternative methods of controlling fire blight.

The allowance for streptomycin should be extended because natural alternatives are not yet viable, and the prohibition of streptomycin at this time would have a negative impact on the production of organic apples and pears. Streptomycin is currently used by organic apple and pear producers to control *Erwinia amylovora* (the pathogen responsible for fire blight disease) when other means of physical, biological, and cultural practices are not effective. The petition explains that commercially available natural substitutes like bacteria or yeasts have been promising in field trials, but do not show consistent and efficacious performance against fire blight equivalent to streptomycin. The unavailability of wholly natural alternatives is one criteria for inclusion of a material on the National List as identified by the Organic Foods Production Act at 7 U.S.C. 6517(c)(1)(A)(ii). The extended expiration date for streptomycin would let growers continue to produce organic apples and pears while providing researchers more time to improve the efficacy of potential natural substitutes.

The only alternative material that is as effective if not more effective than streptomycin is tetracycline, which will no longer be allowed for use as of October 21, 2014 as determined by the NOSB at the most recent business meeting. The NOP also clarified in its memorandum to the NOSB following that meeting that the USDA does not have authority to declare Federal emergency spray programs in response to fire blight pressure. Having neither streptomycin nor tetracycline as controls against fire blight and without proven alternatives, the reliable production of organic apples and pears might not be possible.

PCO appreciates the opportunity to provide comments and thanks the NOSB members for their careful consideration.

Sincerely,



Johanna Miranda
Policy Director