STATE OF WASHINGTON

DEPARTMENT OF AGRICULTURE

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To: National Organic Standards Board

For the record, I am Miles McEvoy, Organic Program Manager for the Washington State Department of Agriculture.

In 2005, the Washington State Department of Agriculture (WSDA) certified over 550 organic crop producers. Nearly half of these producers are involved in organic tree fruit production primarily apples, pears, and cherries but also stone fruit such as peaches, nectarines and apricots. Washington State produces 58% of the US apple crop and over 50% of the US pear crop. In 2003, organic tree fruit comprised 4.7% of the state's apple acreage and over 6% of the pear acreage. Due to strong domestic and international markets thousands of additional tree fruit acres are in transition to organic production.

The environmental benefits of organic food production are widely recognized. An additional benefit of organic production is that organic farms are laboratories of new pest control techniques. Pest control methods such as mating disruption were pioneered on organic farms and are now the standard for pest management of codling moth. The tree fruit industry has significantly reduced the amount of organophosphates, carbamates and organochlorine pesticides due to the pest control advances pioneered by organic growers.

Streptomycin and tetracycline

Fire blight is a common and very destructive bacterial disease of apples and pears. The disease is so named because infected leaves will suddenly turn brown, appearing as though they had been scorched by fire.

Pears are very susceptible to fire blight as well as certain apple varieties such as braeburn, pink lady, fuji and gala. Older varieties such as red delicious are fairly resistant. If fire blight is not controlled it can lead to the death of the tree with significant financial loss due to loss of production and need to replace the tree. Cultural practices can reduce fire blight pressure. Biologicals such as blight ban can help reduce fire blight occurrence but do not completely eliminate the danger. New biologicals are being developed and look promising and may be commercially available within the next few years. Streptomycin and tetracycline are needed to protect organic tree fruit orchards during severe fire blight outbreaks. Over the next few years viable alternatives should be available that could eliminate the continued need of these materials in both organic and conventional tree fruit production.

Floating agents used in post harvest handling
Pears are heavy and they need a floating agent in order to raise the specific gravity to enable the pears to float. Lignosulfonate was the preferred floating agent in the mid 90's – Dr. Eugene Kupferman conducted a survey of packing sheds in 1997 and found that sheds were using 68% lignosulfonate, 16% sodium silicate, and 16% sodium sulphate. In 2005, organic packing sheds were using 2/3 sodium silicate due to increasing restrictions on lignosulfonate by waste treatment plants. Waste treatment plants do not want lignosulfonate because it blocks sunlight and decreases the efficacy of the waste water treatment process.
An alternative to pear floats are packing lines that use floatless dumpers. Floatless dumpers are used in Europe. US packing sheds are starting to install them in order to conserve water resources. There is a large capital investment to install a floatless dumper – larger packing sheds are better able to afford the investment, smaller sheds will find it difficult to afford rebuilding their packing lines.

WSDA supports the continued allowance of lignosulfonate and sodium silicate for floating tree fruit.

For crops, WSDA supports the continued allowance of sodium hypochlorite, chlorine dioxide, horticultural oils for insect and disease control, hydrated lime, hydrogen peroxide as disinfectant and for disease control, streptomycin, tetracycline, humic acids, lignin sulfonate as chelating agent and floating agent and sodium silicate as floating agent.

For livestock, WSDA supports continued listing of hydrated lime.

Thank you for your consideration.

Sincerely,

Miles McEvoy
Organic Program Manager