



United States
Department of
Agriculture

Agricultural
Marketing
Service

1400 Independence Avenue, S.W.
Room 2646-S, Ag Stop 0268
Washington, D.C. 20250-0268

May 27, 2011

Matt C. Smith, Ph.D.
National Program Leader – Soil Management
USDA Agricultural Research Service
5601 Sunnyside Ave., Room 4-2274
Beltsville, MD 20705-5140

Dear Dr. Smith:

As you are aware, the Agricultural Marketing Service, National Organic Program (NOP) is responsible for promulgating regulations for the production and handling of organic agricultural products. The NOP regulations, as published at 7 CFR Part 205, are routinely amended based on public input and collaboration with our stakeholder advisory board, the National Organic Standards Board (NOSB). A significant portion of the NOSB's work is reviewing and recommending materials petitioned to be added to or removed from the National List of Allowed and Prohibited Substances (National List) for use in organic production and handling. Such work often requires the support of research on alternatives to the use of synthetic materials in organic crop production. In consideration of the need for research on such alternatives, the NOP would like to explore the possibility of collaborating with the Agricultural Research Service (ARS) in support of this effort.

One of the more urgent research priorities for the organic community is to explore cultural practices and materials that could serve as alternatives to the use of antibiotics for disease control in organic crop production. At a recent NOSB meeting, the Board heard public comments and reviewed research regarding tetracycline and streptomycin, two antibiotics currently on the National List for use in controlling fire blight. The NOSB Crops Committee's draft proposal was to remove these materials from the National List. However, public testimony from many fruit growers and researchers led the full Board to recommend that these materials remain on the National List until October 21, 2014 to allow time for research into alternative materials and cultural controls.

Given the NOSB recommendation and the need for alternatives to control of fire blight in organic production, we are specifically interested in ARS's support through research in the following areas:

Dr. Matt Smith

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- Effective alternative materials, including biological and other materials approved for organic use, and the efficacy of combinations of materials for management of fire blight in apple and pear production.
- Breeding, production, and propagation of resistant cultivars that are commercially viable and resistant rootstocks.
- Cultural practices such as fertilization, irrigation, pruning, training, orchard floor/understory management, disease forecasting or other production practices that can optimize control of these diseases.

It is important that changes to the NOP regulations are based on accurate scientific and technical information. We greatly appreciate the support that ARS has previously provided for research on sustainable agriculture issues. We look forward to discussing the possibilities for ARS to conduct or otherwise support research that could assist us in making timely and effective changes to the NOP regulations in this area.

Thank you for considering this request. I have asked Dr. Melissa Bailey, Director, NOP Standards Division to contact you in the near future to provide additional background information. In the meantime, please do not hesitate to contact me or Dr. Bailey on (202) 720-3252 or at Melissa.bailey@ams.usda.gov if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Myles R. McEvoy".

Myles McEvoy
Deputy Administrator
National Organic Program



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1400 Independence Avenue, S.W.
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May 26, 2011

Dr. Mary Peet
National Program Leader for Organic Agriculture
National Institute of Food and Agriculture, USDA
1400 Independence Ave SW, Stop 2201
Washington DC 20024-2220

Dear Dr. Peet:

As you are aware, the Agricultural Marketing Service, National Organic Program (NOP) is responsible for promulgating regulations for the production and handling of organic agricultural products. The NOP regulations, as published at 7 CFR Part 205, are routinely amended based on public input and collaboration with our stakeholder advisory board, the National Organic Standards Board (NOSB). A significant portion of the NOSB's work is reviewing and recommending materials petitioned to be added to or removed from the National List of Allowed and Prohibited Substances (National List) for use in organic production and handling. Such work often requires the support of research on alternatives to the use of synthetic materials in organic crop production. Given the need for research on such alternatives, the NOP would like to make a specific funding priority request for organic research projects administered under the purview of the National Institute of Food and Agriculture (NIFA).

One of the more urgent research priorities for the organic community is to explore cultural practices and materials that could serve as alternatives to the use of antibiotics for disease control in organic crop production. At a recent NOSB meeting, the Board heard public comments and reviewed research regarding tetracycline and streptomycin, two antibiotics currently on the National List for use in controlling fire blight. The NOSB Crops Committee's draft proposal was to remove these materials from the National List. However, public testimony from many fruit growers and researchers led the full Board to recommend that these materials remain on the National List until October 21, 2014 to allow time for research into alternative materials and cultural controls.

Given the NOSB recommendation and the need for alternatives to control of fire blight in organic production, we are specifically requesting NIFA's assistance in prioritizing research in the following areas:

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- Effective alternative materials, including biological and other materials approved for organic use, and the efficacy of combinations of materials for management of fire blight in apple and pear production.
- Breeding, production, and propagation of resistant cultivars that are commercially viable and resistant rootstocks.
- Cultural practices such as fertilization, irrigation, pruning, training, orchard floor/understory management, disease forecasting or other production practices that can optimize control of these diseases.

It is important that changes to the NOP regulations are based on accurate scientific and technical information. We greatly appreciate the support that NIFA has previously provided for research on critical organic issues. We look forward to discussing the possibilities for NIFA to fund or otherwise support research that could assist us in making timely and effective changes to the NOP regulations in this area.

Thank you for considering this request. I have asked Dr. Melissa Bailey, Director, NOP Standards Division to contact you in the near future to provide additional background information. In the meantime, please do not hesitate to contact me or Dr. Bailey on (202) 720-3252 or at Melissa.bailey@ams.usda.gov if you have any questions.

Sincerely,



Miles McEvoy
Deputy Administrator
National Organic Program