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September 27, 2013

National Organic Standards Board  
Ms. Ann Michelle Arsenault, Special Assistant  
USDA-AMS-NOP, 1400 Independence Ave. SW.,  
Room 2648-S, Mailstop 0268  
Washington, D.C. 20250-0268

Docket No: AMS-NOP-13-0049

Re: Crops Subcommittee – Streptomycin Expiration Date

Dear Members of the National Organic Standards Board:

This letter is in response to the Crops Committee's Petitioned Material Checklist for Streptomycin (the "Report") dated August 6, 2013 concerning the pending request to amend the existing expiration date of streptomycin to October 21, 2017. Westbridge Agricultural Products is a leading U.S. manufacturer and distributor of organic fertilizers, pesticides and related products, and is the exclusive distributor of Blossom Protect™ in the United States.

Blossom Protect™ is a bio-control pesticide which uses a competitive mode of action to control the fire blight bacteria, *Erwinia amylovora*. Blossom Protect™ was first introduced to the United States for commercial use in January 2012. The product has been approved for use in certified organic production by the U.S. Environmental Protection Agency and the Washington State Department of Agriculture Organic Food Program. The manufacturer of Blossom Protect™ and the holder of the federal and state registrations is bio-ferm, GmbH. Blossom Protect™ is widely used in Europe for the prevention of fire blight. Blossom Protect™ is an important tool for growers in preventing fire blight in organic pome fruit production and, as research performed at many leading universities shows, is an effective alternative to antibiotics, including streptomycin. In addition, it may be used as part of an IPM approach to prevent the disease and minimize the potential for antibiotic resistance in both organic and conventional orchards.

We have also reviewed the original petition (the "Petition") requesting the extension of the deadline for streptomycin submitted in February 2013 by Washington State Horticultural Association and three other organizations and the Technical Evaluation Report for Streptomycin dated March 8, 2011 ("Technical Evaluation"). The Technical Evaluation was cited in both the Report and the Petition. This response will also address some of the information contained in the Petition which is outdated or incomplete.

1. Damage to Westbridge from Use of Product Name in Report. We are both surprised and concerned to read the name "Blossom Protect™" in a negative context in the narrative portion of the Report. At the bottom of the third page of the Report, in the section entitled "Points of Agreement and Disagreement, Fire Blight Control," the following statement is made: "Experience of pear growers

especially in the 2013 season has shown that Blossom Protect has not worked well in the Pacific Northwest and California.” This remark is concerning for the reasons set for in this Section 1 and is inaccurate as discussed in Section 2.

(a) The only registered product the Report singled out by name in the narrative is Blossom Protect™. In other cases the Report uses generic terms to categorize products, such as “copper materials”. The reference to Blossom Protect™ is critical of its effectiveness but cites no supporting evidence or data. Without question, the Report’s negative reference to Blossom Protect™ has damaged the reputation and credibility of the product and Westbridge and bio-ferm.

(b) Westbridge has spent hundreds of thousands of direct dollars in efficacy studies and advertising to promote Blossom Protect™. This Report, in a matter of a few lines, has in large part undone those efforts and expenditures. As stated above, this disregard for the reputation of both Blossom Protect™ and, by association, Westbridge and bio-ferm, has caused substantial and possibly irreparable damage which could have been avoided by a more thoughtful writing of this Report.

(c) Westbridge was not notified by the NOSB that the Report would single out Blossom Protect™ negatively in the narrative and was not afforded an opportunity to contest the accuracy of the negative comment.

2. Information Presented in Report and Petition concerning Blossom Protect™ is Incomplete and Outdated. The Report relies on the Technical Evaluation which only cites data from 2008 through 2010. Blossom Protect has been thoroughly tested by university researchers in Washington, Oregon, California, Michigan and New York from 2008 to 2013. The use of this old and incomplete data has the effect of negatively skewing growers’ views. Please note that the current data referenced below is available upon request.

(a) Comments on the failure of Blossom Protect™ for fire blight control in pears in the Pacific Northwest and California for 2013 are incorrect and misleading. At the time the Petition was prepared in February 2013, Blossom Protect™ applications would not have been made because, particularly in the Pacific Northwest, pome fruit trees would not have even broken dormancy. Moreover, at the time of the NOSB meeting in April 2013 results were not available. These premature conclusions on 2013 results are puzzling, along with the omission of numerous trials that show Blossom Protect™ performing on a par with, or better than, streptomycin. Two of the leading researchers in the field of fire blight control, Timothy Smith, Washington State University Pome Extension Specialist, and Dr. Ken Johnson, Oregon State University, have conducted inoculated trials with Blossom Protect™ for multiple years. Their research has repeatedly demonstrated the excellent efficacy of Blossom Protect™. In addition, these trials demonstrated that Blossom Protect™, rotated with an experimental copper product, yielded the best results of any treatment. Growers who used Blossom Protect™ in 2012 and 2013 have also reported favorable fire blight control. These same growers anticipate using it again in future years. Westbridge acknowledges that Blossom Protect™ has some limitations, such as not being labeled for use on rat tail bloom in pome orchards. However, Blossom Protect™ is a vital and important organic product in the fight against fire blight and as a part of an integrated program, especially where fire blight is becoming resistant to antibiotics.

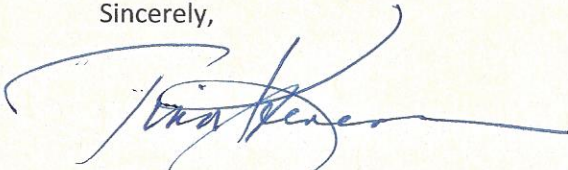
(b) Timothy Smith and Dr. Ken Johnson have shown that Blossom Protect™, when rotated or tank-mixed with streptomycin, achieves results that are among the best in the respective trial. Performance of Blossom Protect™ as an effective control of fire blight in the mid-west and east coast depends on the timely applications late in the bloom cycle, at 80% and 100% bloom. In these regions, the environment is most conducive to *E. amylovora* infection later in the bloom cycle.

(c) The organic grower survey results mentioned in the Petition and the Report are from 2010 through 2012. Blossom Protect™ was not commercially available until January 2012, and most growers would have had little, if any, experience with it before that time. Therefore, the survey results are most likely referring to other biocontrol products that may be much less effective than Blossom Protect™.

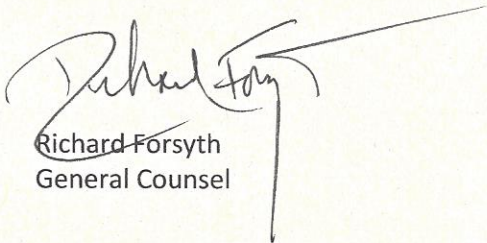
In conclusion, Westbridge does not oppose the extension of the expiration date for streptomycin to 2017, but we believe that Blossom Protect™ was unfairly and undeservingly singled out for negative comments on its efficacy. We ask that the Sub-Committee issue a clarification on the comments incorporated in the Report which were based on outdated and incomplete data.

Thank you for your consideration and we look forward to your response.

Sincerely,



Tina Koenemann  
President



Richard Forsyth  
General Counsel