



October 7, 2014

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

Docket: AMS-NOP-14-0063

RE: Materials Subcommittee - Research Priorities

Dear Ms. Arsenault:

Thank you very much for this opportunity to provide comments on the Materials Subcommittee proposal on Research Priorities for 2014.

The Organic Center is a non-profit organization with the mission of convening credible, evidence-based science on the environmental and health benefits of organic food and farming and communicating them to the public. We are a leading voice in the area of scientific research about organic food and farming, and cover up-to-date studies on sustainable agriculture and health while collaborating with academic and governmental institutions to fill knowledge gaps.

The Organic Center thanks the Materials Subcommittee for its recommendation on Research Priorities. We appreciate the creation of the Research Priority Framework and the efforts made by each Subcommittee to bring forth its research priorities for 2014.

The Organic Center has reviewed the list of topics included for the 2014, and we're particularly pleased to see the inclusion of "Plant Disease Management" and "Soil Building Practices." The Organic Center is actively involved in conducting and communicating research on these issues and we expect the prioritization of these topics by NOSB may help us secure further funding.

We also read with great interest the Crops Subcommittee Discussion Document on "Protecting Against Contamination of Farm Inputs" and would like to share with NOSB our work to conduct research on factors affecting the presence of arsenic in organic rice. Our goal is to offer future strategies to the organic sector to minimize such accumulation.

Plant Disease Management

The Organic Center is collaborating with University of Florida researchers, citrus growers, and other non-profits to find organic solutions to control citrus greening. This project will determine the efficacy of labeled organic pesticides for controlling the Asian citrus psyllid (ACP), develop protocols for organic growers struggling with citrus greening, and examine naturally occurring organic trees resistant to citrus greening that can be bred to create non-GMO citrus greening-resistant varieties of citrus. This study will provide organic growers nationwide with information



on how to protect their citrus groves from collapse due to citrus greening. It will also provide policy makers with data needed to incorporate organic alternatives to ACP control into area-wide treatment protocols.

Additionally, we have recently completed our fire blight project, which was carried out in collaboration with David Granatstein and Harold Ostenson. This project provided critically needed information on how to prevent fire blight from decimating apple and pear orchards without the use of antibiotics. The published report includes lessons learned from a systems approach to controlling fire blight without antibiotics which have been successfully used by dozens of Pacific Northwest organic orchardists. These strategies, along with previously existing materials, have been made available and provide a knowledge base for organic orchardists to refer to as they shift to non-antibiotic control. The written report is publicly available to growers, and covers methods for controlling fire blight holistically as well as issues such as sanitation, vigor control, sequence and timing of control materials, spray coverage, and varietal susceptibility. This research provides an important tool for organic growers to fight fire blight with the sunset of oxytetracycline this October.

Soil Building Practices

The Organic Center is also involved with research in the priority area of Soil Building Practices. Soil health is essential to long-term crop viability and yield consistency. To add to the increasing body of knowledge about methods for maintaining productive healthy soils, The Organic Center is working with the National Soil Project at Northeastern University to examine the benefits associated with different soil components such as humic acids, fulvic acids and humin, and develop a reference database that will enable agronomists, farmers, and environmental scientists to correlate soil health and productivity with agricultural practices. This will be directly useful to organic farmers, who rely on soil quality, through bench-marking that will facilitate remediation, maintenance and conservation of soil resources.

Arsenic in Rice

The Organic Center is also participating in research that compliments the Crops Subcommittee Contamination in Farm Inputs Discussion Document. We are currently collaborating with the U.S. Department of Agriculture's (USDA's) Agricultural Research Service (ARS) to conduct targeted research on the factors affecting the presence of arsenic in organically grown rice. ARS scientists are testing stored samples of organic rice grown under controlled organic conditions at USDA research facilities, and examining the factors that directly impact the rate of arsenic accumulation in rice grown organically. Factors under investigation include varietal selection, management practices, cover crops, and organic compliant fertilizers. Our preliminary results suggest that the type of organic compliant fertilizer applied to rice does not affect arsenic uptake by organic rice, nor does the rate at which these fertilizers are applied. The completion of this project will provide tactics for organic rice growers to reduce arsenic accumulation in rice.

The Organic Center is continually collecting information on research needs from multiple sectors of the organic community. We conduct industry roundtables, work with the Organic Trade Association's Farmers Advisory Council, meet with professors on our Science Advisory board and hold one-on-one meetings with individual companies, farmers, professors, and consumers.



We would like to offer ourselves as a resource to the NOSB Materials Subcommittee, especially in the area of research priorities. Please do not hesitate to contact us for information on the data that we have been collecting or with questions you would like us to pose the research community.

Again, on behalf of The Organic Center, I would like to extend my thanks to the Materials Subcommittee for your commitment to furthering organic agriculture.

Respectfully submitted,

Jessica Shade
Director of Science Programs
The Organic Center