



FACILITY PEST MANAGEMENT IN ORGANIC PRODUCTION & HANDLING

Guidance

Pest management in organic facilities is very important. Pests are just as likely to attempt to access food and water in organic facilities as they are in conventional ones, but organic facilities have to follow specific guidelines within the organic regulations to prevent and control pests. The National Organic Program (NOP) lays out a uniform set of standards that growers, processors, packagers, and warehouse operators should follow to produce products that are labeled and sold as organic. Under the NOP, the use of pesticides is not prohibited but it is a last resort option.

NOP REGULATIONS AND PCO POLICY

The National Organic Program (NOP) regulations outline a specific order of pest control methods in areas where organic products are processed, handled, or stored (§205.271).

- **Preventative** measures, such as cleanliness and good sanitation, must be used first.
- Then **mechanical** measures, such as mechanical, sticky, or pheromone traps must be tried.
- If preventative and mechanical measures do not adequately control pests, you may use **NOP allowed materials** from the National List of Allowed and Prohibited Substances.
- If preventative, mechanical and National List materials are not effective, you may use synthetic pesticides not listed on the National List upon approval by PCO.

ADDITIONAL INFORMATION

WHAT CAN I DO TO PREVENT PESTS?

Measures to prevent pest issues may include:

- Removal of pest habitat, food sources, and breeding areas
- Prevention of access to handling facilities
- Management of environmental factors, such as temperature, light, humidity, atmosphere, and air circulation, to prevent pest reproduction.

WHAT MECHANICAL MEASURES CAN I USE TO CONTROL PESTS?

Mechanical measures to control pests include but are not limited to traps (mechanical, sticky, or pheromone), light, or sound.

APPROVED INPUTS

All inputs must be reviewed and approved by PCO prior to use, so be sure to check with us or consult a current PCO Approved Materials List, OMRI, or WSDA list prior to purchasing or using a product. PCO does not endorse any of the products listed in this guidance document. This is not an all-inclusive list and other inputs may be allowed. Please contact PCO if you have any questions on materials or restrictions.

NOP ALLOWED MATERIALS

Active ingredients must be allowed on the National List without any restrictions preventing use for pest control.

Examples of allowed active ingredients include:

- Ammonium carbonate—for use as bait in insect traps only, no direct contact with crop or soil.
- Aqueous potassium silicate (CAS #-1312-76-1)—the silica, used in the manufacture of potassium silicate, must be sourced from naturally occurring sand.
- Boric acid—structural pest control, no direct contact with organic food or crops.
- Copper sulfate—for use as an algicide and for tadpole shrimp control in aquatic rice production, is limited to one application per field during any 24-month period. Application rates are limited to levels which do not increase baseline soil test values for copper over a timeframe agreed upon by the producer and accredited certifying agent.
- Elemental sulfur.
- Lime sulfur—including calcium polysulfide.
- Oils, horticultural—narrow range oils as dormant, suffocating, and summer oils.
- Soaps, insecticidal.
- Sticky traps/barriers.
- Sucrose octanoate esters (CAS #s—42922-74-7; 58064-47-4)—in accordance with approved labeling.
- As insect management. Pheromones.
- As rodenticides. Vitamin D₃.
- As slug or snail bait. Ferric phosphate (CAS # 10045-86-0).

Inert ingredients are not reviewed in materials that do not have plant, animal, or food contact. The operator must document the specific location, application manner, and method of contamination prevention in their Organic System Plan.

If the material consists of active ingredients that are listed on the National List, the following restriction will apply:

- *Pest Management Materials Consistent with National List.* May be used if management practices and physical and mechanical controls of pests are not effective. Must document specific location, application manner, and method of contamination prevention in Organic System Plan. §205.271(c)

SYNTHETIC PESTICIDES NOT ON THE NATIONAL LIST

According to the pest management hierarchy outlined at §205.271, if materials listed on the National List are used and found to be ineffective, synthetic materials not listed on the National List may be used. If the active ingredients are synthetics not on the National List, then you must receive prior approval from PCO through the “Agreement for use of Synthetic Pesticide in a Facility” form. Also, the producer must prevent contact of the organically produced products or ingredients with the substance used.

If a facility pest management material contains active ingredients not listed on the National List, the following restriction will apply:

- *Facility Pest Management Plan.* Must be part of approved facility pest management plan. The handler and certifying agent must agree on the substance, method of application, and measures taken to prevent contact of the organically produced products with the substance used. §205.271(d)

IS PCO APPROVAL ALWAYS REQUIRED FOR FACILITY PEST MANAGEMENT MATERIALS?

Approval from PCO is required in the following situations:

- If you are certified as a processor/handler and you are using a synthetic substance not on the National List in an organic production area, including but not limited to storage areas, loading docks, warehouses and packing areas.
- If you are certified as a crops producer and you are using a synthetic substance not on the National List in a facility where organic product is produced and/or stored, including but not limited to crop and seed storage or in or around a greenhouse.
- If you are certified as a livestock producer and you are using a synthetic substance not on the National List in a facility where organic product is produced and/or stored, including but not limited to feed storage areas, inside milk house, inside barn, outside of barn (if animals have potential access), inside poultry house and poultry outdoor access areas.

Approval from PCO is not required in the following situations:

- If you are certified as a processor/handler and you are using a synthetic substance not on the National List in non-organic production areas, including but not limited to offices, bathrooms, lunchrooms and exterior of building.
- If you are certified as a livestock producer and you are using a synthetic substance not on the National List in non-organic production areas, including but not limited to outside of and/or under poultry house (i.e. manure pit).