

ORGANIC PEST MANAGEMENT

All pest management activities will be consistent with the standards set forth in Section 205.271 of the National Organic Program (NOP). A specific four-step protocol will be used as a guide to the overall organic pest management process. This protocol is designed in terms of priority; however, some steps may occur concurrently while other steps may not occur at all. In some cases, while following this protocol, it may be deemed unnecessary to take action beyond the first step. The goals of the four-step process are **step one**: Prevent pest activity, **step two**: Mechanically trap pests that arise, **step three**: Treat with NOP approved materials if trapping proves insufficient, and, **step four**: Using non-approved materials for control only in such a manner that prevents contact with organic product.

ORGANIC PEST MANAGEMENT PROTOCOL

The following outline will be used as the guide for prevention and control of pests at this organic facility.

STEP 1: PEST PREVENTION

- Maintain a high level of exterior and interior sanitation to prevent the harborage of pests. Remove weeds, spillage, refuse, debris, and other materials that may contribute to an increase in pest activity.
- Identify and correct structural deficiencies that may permit pest entry and/or promote pest development and distribution.
- Inspect and make recommendations on environmental factors that may influence and minimize pest activity, such as positive air pressure, exterior lighting less attractive to insects, humidity control, etc.

STEP 2: MECHANICAL OR PHYSICAL PEST MANAGEMENT

- Physical pest removal. The preferred method involves vacuuming of pests with equipment designed to promote effective removal of pests and pest debris such as webbing, frass, droppings, etc. Removal of pests in other ways, such as sweeping, may be acceptable so long as the methods used do not promote the accidental spreading of the pest.
- Trapping insects and rodents by the use of mechanical trapping devices. These rely solely on the mechanical attributes of the device to capture pests and will not include any chemical substances. Examples include mechanical rodent traps, insect light traps (both electrocutor and glue board types as may apply), insect & rodent glue board traps.
- Non-synthetic lures or repellants, such as pheromone lures may be used to enhance the effectiveness of insect traps. Such pheromones must be listed on The List of Allowed and Prohibited Substances of the National Organic Program Standards (NOP). If applicable, the Organic Material Review Institute (OMRI) has published a list of brands of pheromone lures that should not include prohibited materials.
- When conditions are applicable, treatment of isolated areas of pest infestation may be carried out through temperature manipulation (heat or cold) sufficient to assure pest mortality.

STEP 3: APPLICATION OF APPROVED MATERIALS

If the practices provided for in steps one and two become insufficient to control pests effectively consideration may be given to limited application of pesticides. Any material applied in step three must be listed in The List of Allowed and Prohibited Substances of the NOP.

STEP 4: APPLICATION OF MATERIALS NOT ON THE NATIONAL LIST

If satisfactory control of a pest infestation cannot be achieved by prevention, mechanical control methods, or through use of approved materials, the infested area may be treated by applying materials not listed on the National List of allowed substances. If this method is applied all necessary steps must be outlined in advance and followed during treatment to assure that no organic product comes in contact in any way with the materials used. All organic products must be removed in advance from the treated area(s) and shall not be returned until all measures have been taken to assure that no residues of the material remain.

EXCEPTION TO FOUR-STEP PROTOCOL

In the event the protocol above may be insufficient to control pests, or pest activity prohibited by Federal, State, or local laws and regulations, non-approved substances may be applied, as long as all necessary steps are taken to prevent contact with organic product(s). This exception to the four-step protocol is consistent with NOP Section 205.271(f) Facility Pest Management Practice Standard, which states “Notwithstanding the practices provided for in paragraphs (a), (b), (c), and (d) of this section, a handler may otherwise use substances to prevent or control pests as required by Federal, State, or local laws and regulations, provided, that, measures are taken to prevent contact of the organically produced products or ingredients with the substance used.”