



ORGANIC FACT SHEET

PEST CONTROL IN ORGANIC FACILITIES

QUICK FACTS

- The primary means of pest control in certified organic facilities is through Prevention not Treatment
- All inputs must be approved and consistent with the National List of Allowed and Prohibited Substances.
- Changes to the pest control plan must be approved before implementation.



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THE NATIONAL ORGANIC STANDARDS

The National Organic Standards (NOS) require all food processors to have a facility pest control plan in place. This fact sheet will walk you through the requirements and the process of developing a pest control plan that best meets the needs of your certified organic processing facility.

Section 205.271 of the NOS describes the process that certified operations are required to follow. This is a three step process:

STEP ONE: PREVENTION

§205.271 Facility pest management practice standard.

(a) The producer or handler of an organic facility must use management practices to prevent pests, including but not limited to:

The primary means of control is pest prevention practices. This is your first line of defense. Measures include:

- 1) The removal of pest habitat, food sources, and breeding areas. Keep the facility as clean as possible to deter pests.
- 2) Prevention of access to handling facilities. Seal up door cracks and install screens in windows. Keeping pests out of your facility by exclusion is an essential step to a solid pest control plan.
- 3) Management of environmental factors, such as temperature, light, humidity, atmosphere, and air circulation, to prevent pest reproduction. Avoid creating a comfy environment for pests to reproduce in. How you adjust the environmental conditions will be specific to the type of activities occurring in your facility. Understand which conditions favor common pests so you reduce the incidence.

If despite these efforts you are seeing some signs of pests, they can be controlled through the following actions.

(b) Pests may be controlled through:

- 1) Mechanical or physical controls including but not limited to traps, light, or sound; or
- 2) Lures and repellents using nonsynthetic or synthetic substances consistent with the National List. Simple snap traps, glue boards, pheromone lures, fly tape, light and sound sensors can be employed to control pests. They are also useful for monitoring pest levels and presence.

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STEP TWO: THE NATIONAL LIST

(c) If the practices provided for in paragraphs (a) and (b) of this section are not effective to prevent or control pests, a nonsynthetic or synthetic substance consistent with the National List may be applied.

Step two of the facility pest control standard allows the use of a substance to help you control your pest concerns when physical controls are not enough. However, the material must be listed on the National List of Allowed and Prohibited Substances. The National List includes some substances that can help manage pests such as Vitamin D3, which is used to deter small rodents, and boric acid which is commonly used for ant control. If pest prevention and the use of materials on the National List are not sufficient to control facility pests, then an operator may proceed to the third step.

STEP THREE: OTHER APPROVED MATERIALS

d) If the practices provided for in paragraphs (a), (b), and (c) of this section are not effective to prevent or control facility pests, a synthetic substance not on the National List may be applied: Provided, That, the handler and certifying agent agree on the substance, method of application, and measures to be taken to prevent contact of the organically produced products or ingredients with the substance used.

When all else fails the NOS does permit the use of synthetic baits and other products that can help control an infestation. The important requirement in step three is that MOSA must pre-approve the substance you choose, and your plan to prevent contamination of any organic products.

When you make changes to your facility pest management plan, remember to update the pest management section in your Organic System Plan to accurately reflect the measures in place to prevent pests, and include all approved materials (synthetic or nonsynthetic).

Such plans must include how the substance will be used so it will not come in contact with organic products. Also add any new products being used or proposed for use to your Handler Input Inventory, and have an updated copy for MOSA. A current pest control map identifying the locations of traps or bait stations around the facility is also required when facility pest control plans are developed or changed. If you find that you have tried the controls in steps one and two of the standard and are still having issues, then set up a pest control plan that protects your organic products while keeping your facility pest free, and contact MOSA to review and approve your plan before use.

Often forgotten is that building exteriors are part of your Organic System Plan. The methods of pest control utilized around the exterior of the building are also subject to the three step process. The facility pest control standard is intended to prevent the overuse of toxic materials for pest control, while still preventing unnecessary outbreaks. The standard is not meant to increase risk or make your operation susceptible, but instead it attempts to ensure the least toxic use of control is employed. An effective pest control plan around the exterior reduces the potential of pest control problems within the facility.

To review- operators are required to follow is a three step process. First use preventative management, mechanical and physical controls or acceptable lures and repellents to keep pests away. If these are not effective to prevent or control pests, then you can proceed to the use of synthetics on the National List. If none of these measures are effective, then you may proceed to the use of a synthetic substance not on the National List. However, the substance, method, and plan to prevent contamination of organic products must be approved prior to use.

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RESOURCES:

MOSES Guidebook for Certification: <https://mosesorganic.org/publications/guidebook-forcertification/>

USDA "Is Organic an Option for Me" <http://www.ams.usda.gov/sites/default/files/media/IsOrganicAnOptionforMe.pdf> V1.3 1-2

