



# CCOF

Organic Certification

Education & Outreach

Political Advocacy

Promotion

September 30, 2013

Ms. Ann Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Ave., SW.  
Room 2646-So., Ag Stop 0268  
Washington, DC 20250-0268

**Docket: AMS-NOP-13-0049**

**RE: NOSB CAC Subcommittee Discussion Document on application of 205.206(e)**

Dear Ms. Arsenault and NOSB,

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment the Discussion Document titled "Toward Clarifying Accredited Certifying Agents' Application of 205.206(e)."

CCOF is the largest USDA National Organic Program-accredited certification agency of organic farmers, with 2,000 individual operations certified for the scope of crop production. These operations are located in 38 states, and throughout Mexico. We take the responsibility that comes with this position of market leadership very seriously. We strive to provide a certification program of the highest quality to support the needs of the organic community and ensure the organic integrity of certified operations and products in the marketplace.

We agree strongly with many points in this discussion document. Specifically, we applaud:

- The preference of preventive pest control measures over the use of allowed synthetic materials
- The recognition that pest control and management is one of the most challenging aspects of organic crop production, and that organic producers must have tools to protect their crops from potentially devastating pests and weeds
- The acknowledgement that there is likely a lack of clear and comprehensive understanding across some sectors of the organic community about the role of Accredited Certification Agencies (ACAs) and how we apply the requirements of 206(e)
- The support for building better public to understanding of the rigors placed on organic operations under the existing standards in order to facilitate reasonable and informed work regarding the listing of materials on 205.601.

In general, we suggest that it is important to keep in mind the "Sound and Sensible" philosophy when discussing organic production practices such as pest control. The actual **practices** implemented in the field by the producer are more important than what the **paperwork** says that a producer will do. At CCOF, we put the primary focus of applying 206(e) at the onsite inspection.



We believe that 206(e) is an essential part of the organic production standards that should be clearly understood and consistently applied. While there is always room for improvement, we believe that we at CCOF, and certifiers in general, are doing a sufficient job at applying this standard, and that producers are in general doing an excellent job of implementing preventive pest control measures on the farm.

Until recently, each fall, CCOF would co-host a two-day training with California Polytechnic State University focused on Integrated Pest Management. This event is attended by CCOF certification staff, CCOF inspectors, and CCOF growers, plus pest management professionals. Topics include creating NOP-compliant pest management plans and offers both research presentations and hands-on field training.

The lack of currently available effective pesticide tools creates an inherent need for organic farmers to comply with the preventive pest management practices requirement. For organic farmers, preventive pest management practices are their most important tools, unlike their conventional farm counterparts who practice “spray and pray” or get caught on the pesticide treadmill.


Pest problems are dynamic and ever changing: farmers must act quickly. Sometimes, farmers need the help of a licensed professional Agricultural Pest Control Adviser (PCA). PCAs are trained in integrated pest management, where preventive, mechanical, and biological tools are used before chemical pest management. PCAs must write a written recommendation for the farmer that includes a description of all of the preventive practices, and they create economic pest thresholds to be reached before a pesticide is applied. These written recommendations are excellent ways for farmers to demonstrate they are meeting the requirements of 205.606(e). Our inspectors review these written recommendations each year at inspections as part of the recordkeeping requirement.

Many of the preventive pest control practices described in 206(a)(1-3), such as good sanitation, selection of appropriate species, and soil fertility management, may seem so fundamental to good management practices that farmers may not even think of them as good pest control practices, and would implement such practices whether they were required or not by the organic regulations. For the certifier, it can sometimes be challenging to get the organic farmer to list all such practices on a piece of paper.

CCOF has tried to make it easy for farmers to describe all of their preventive plans prior to pest outbreak and the urgent need to use a restricted pesticide. In our template Organic System Plan (OSP) forms, we have included a section called the “Pest Management Matrix” (in G5.0). This is a simple way to describe all preventive practices for all the pests an organic farmer has to deal with. It lists the common preventive pest control measures and allows the farmer to check a box to show that they use it. In our 11 years of experience implementing the USDA organic regulations, we have found this to be a much more efficient and effective way of gathering this information on paper than asking the farmer to list all



practices. The relevant part of the Organic System Plan template looks as follows (and is available online at [www.ccof.org/documents/g50-pest-management](http://www.ccof.org/documents/g50-pest-management)).

	NOP§ 205.206 & 205.203 (e) (3)	<b>PEST MANAGEMENT</b>	<b>OSP SECTION: G5.0</b>
	Electronic version available at <a href="http://www.ccof.org">www.ccof.org</a>	Page 1 of 1	

Operation Name: \_\_\_\_\_ Date: \_\_\_\_\_

**A. PREVENTATIVE PEST MANAGEMENT STRATEGIES**

*Preventative management practices such as crop rotations and nutrient management must be used as a first resort to manage insects, diseases and weeds. Mechanical and physical controls may also be used.*

Check the strategies you use to prevent pests:	Weeds	Insects & invertebrates	Diseases & nematodes	Vertebrate pests
Crop rotation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cover cropping	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strip cropping, interplanting or planting mixed species	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Trap crops	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Crop nutrient management	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sanitation, cleaning up debris, nesting areas, removal of disease vectors, weed seed sources, etc.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Growing location	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Timing of planting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Resistant varieties or rootstock	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Remove pest by hand (hoeing, pruning, picking, vacuum)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mechanical cultivation (disc, plow, harrow, rototill, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mowing or grazing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Irrigation method (drip, furrow, etc.) or management	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mulching with biodegradable materials	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plastic or synthetic mulches or solarization	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plant beneficial habitat areas	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Construct predator habitat (owl nests, perches, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Release beneficial organisms	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Construct barriers (fences, raised platforms, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Traps	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Flaming	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other physical/mechanical means (describe):				
Burning crop residue (Complete C below)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**B. DO YOU USE SUBSTANCES FOR CONTROLLING WEEDS, INSECTS OR DISEASES?**

No, no substances used     Yes, complete 1 below, and list all substances in the OSP Materials List

*When preventative and/or mechanical means of managing a weed, insect or disease pest is insufficient, a natural (non-synthetic) material may be applied. When this method is insufficient, an allowed synthetic material may be used if it is on the National List and if the conditions for using the substance are documented in the Organic System Plan.*

- 1) Describe the conditions that must exist before you will resort to using substances for weed, insect or disease control:
- When preventative measures described above fail     When economic thresholds for pest damage are exceeded
- Other (describe): \_\_\_\_\_

The farmer completes this section of the OSP upon initial application and updates it throughout the course of the year if it changes. The preventive pest practices described by the farmer in the CCOF Pest Management Matrix are verified throughout the year at annual, unannounced, and sampling inspections.

A different section of our OSP template asks the farmer to list all materials, natural and synthetic, that they use or plan to use on their farm. When a farmer requests that CCOF add a synthetic material (listed



on 601) to their OSP, we provide them with information about any restriction on the use of such material.

All synthetic pest control materials are given the restriction that the material “may only be used if the requirements of 205.206(e) are met, which requires the use of preventive, mechanical, physical, and other pest, weed, and disease management practices.” The farmer is provided with a list of all materials (natural and synthetic) that have been approved for use on their farm by CCOF, including the relevant restriction.

Generally, the answer to the question “Describe the conditions that must exist before you will resort to using substance for weed, insect, or disease control” is either “when preventive measures fail, or “when economic thresholds for pest damage are exceeded.” These are two very reasonable responses to this question. Most certified organic farmers have built up their farm experience through time and practice, and have the wisdom to know what will and will not work on their farm. CCOF does not force an operation to have catastrophic crop loss before allowing them to use an allowed synthetic material.

For example, if an organic vineyard suffers from powdery mildew (and almost every single one of them in California does), the farmer knows from experience that sulfur is the only material that will work, even if they implement every available preventive measure to control mildew. The farmer simply can’t control the weather. Similarly, if a farmer’s apple orchard has codling moth problems, we do not require that they allow the entire apple crop to become unsellable before they begin using pheromones to disrupt the moth mating cycle. We believe that the application of 206(e) must be sensible, as well as sound.

Records are not the most important part of preventive pest control practices. The actions taken by the farmer are. While the paperwork is important, and the farm will not be certified without it being completed and demonstrating the ability to comply, it is the observations that the inspector makes onsite that are fundamentally more important. Generally, pest control practices are observable in the field by the inspector. Tools such as keeping the farm clean of pest habitat, cover cropping to disrupt pest cycles, and mowing down weeds can easily be observed by the inspector during the onsite audit. CCOF inspections cover whether the requirements of 206(e) are being met in the following ways:

- Inspectors review the approved OSP sections (including the Pest Management Matrix) that describe non-chemical pest management methods, and then confirm implementation of that plan onsite
- Inspectors review and verify that there is crop rotation, a primary cultural method for the integrated management of all pest categories
- Inspectors specifically assess whether, if materials are applied for pest control, appropriate non-chemical strategies and methods have been implemented
- Inspectors are required to list and describe the significant pests of an operation, and what management methods are used

The USDA organic regulations require holistic approaches that inherently provide for non-chemical pest management. The prime example is the requirement of crop rotation. Crop rotation is a cultural practice that has significant and far-reaching impact on all pest categories (weeds, disease, insect, and vertebrate). Though the cover crop verification is not covered directly in relation to 206(e) questions, it is verified by inspectors in the soils section and should always be taken into account when assessing



whether non-chemical pest-management methods have been used prior to application of allowed synthetic materials.

The CCOF template inspection report asks the inspector to answer the following questions:

- Prior to applying pest control substances, is the grower using applicable cultural, physical, biological, and mechanical management practices? (YES/NO answer)
- List significant pests and control methods: (Free text answer)

In preparing these comments to the Compliance, Accreditation, and Certification Subcommittee, CCOF staff looked at a random selection of recent inspection reports to see what inspectors are reporting in response to the questions above. Below is a sampling of the comments and information provided by the inspectors in their reports (the name of the farm has been edited out). We did not edit or select these comments specifically, and they should be taken as a good sample of the type of information provided by inspectors on a daily basis.

**Farm A:** inspection on 5/2/13 of a farm applying for new certification. This farm does not apply any pest management materials.

- *Prior to applying pest control substances, is the grower using applicable cultural, physical, biological, and mechanical management practices?* **YES**
- *List significant pests and control methods:* A bit of row cover was being used to prevent further flea beetle damage to brassicas. Interestingly, a different cultural technique to prevent flea beetle damage to brassica transplants had been tried. Farm A direct sowed arugula in parallel lines adjacent to the planted crop of kales with the succulent, germinating brassica attracting flea beetles keeping them off of the new transplants.

**Farm B:** inspection on 9/2/13 of a farm applying for new certification. Farm's primary pest is powdery mildew and they indicated that they use "canopy management" as a preventive pest control practice on their OSP forms, and three allowed synthetic pest control materials (sulfur).

- *Prior to applying pest control substances, is the grower using applicable cultural, physical, biological, and mechanical management practices?* **YES**
- *List significant pests and control methods:* At the time of inspection the grapes were heavy on the vines, canopy management techniques had leaves stripped from near the clusters for mildew prevention and the vineyard showed alternate row cultivation as well as no herbicide use with weeds in row with the vines. Under vine cultivation is performed by hand labor and a crawler tractor is used to reduce compaction, erosion potential and for stability. ... Farm B's vineyard is fenced with owl boxes distributed throughout the vineyard.

**Farm C:** inspection on 7/24/13 for a renewing operation (almond grower).

- *Prior to applying pest control substances, is the grower using applicable cultural, physical, biological, and mechanical management practices?* **YES**
- *List significant pests and control methods:* Biological control of mites; release of predatory mite. Prevailing winds (airflow) assist in mitigating. Responses to Matrix G 5.0 indicative of ongoing efforts to maintain compliance with NOP 205.206(e).



**Farm D:** inspection on 6/2/13 for a renewing operation (apple grower).

- *Prior to applying pest control substances, is the grower using applicable cultural, physical, biological, and mechanical management practices? YES*
- *List significant pests and control methods:* Gophers are the main pest and are trapped. Fire blight is a concern, orchard is kept clean. Scab – Farmer D is trying to mulch trunks that are heavily impacted by sun. Codling Moth will use Isomate pheromone disruption. Currently native plants and reseeded cover crop grow and are cultivated in spring. The plan is to plant cover crop when financially feasible.

Farm D in particular is an interesting example because codling moth is a key pest in most apple orchards. Codling moth is pervasive and preventive cultural, physical, or biological management methods, as well as any known non-synthetic materials, are typically insufficient for reasonable economic levels of control. Therefore, an allowed synthetic pheromone mating-disruption material is typically used. The OSP for this operation lists a variety of preventive pest management practices, and the inspector describes cover cropping in the appropriate part of the inspection report.

As demonstrated in the examples above, CCOF organic inspectors are well trained to look closely at pest control methods and materials as a fundamental part of the onsite inspection. Because we believe that the inspector is the lynch pin in this area, we call on the NOP to finalize enforceable Inspector Qualifications guidance as proposed by the NOSB so that the same pressures CCOF employs to achieve these results are replicated across all certifiers.

We hope that this information has been useful to the Compliance, Accreditation, and Certification Subcommittee, and that it helps allow the community to sufficiently value the work done by certifiers in assuring compliance with 206(e). We would be happy to answer any additional questions or provide any additional document templates, inspection examples, or other information that may be of assistance.

Sincerely,



Cathy Calfo, Executive Director/CEO  
CCOF, Inc



Jake Lewin, Chief Certification Officer  
CCOF Certification Services, LLC

*CCOF is a nonprofit organization founded in 1973. It is one of the oldest and largest organic certification agencies in North America. CCOF serves as a trade association for more than 2,600 certified organic producers and 300 supporting members, in 38 states and three countries.*

