



AMERICERT INTERNATIONAL

(Formerly known as OIA North America)

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Guidance on NOP Organic Pest Control Standards (Section 205.271 of the NOP standards)

Pests can cause serious problems for those who manage organic facilities. Complications range from economic hardship to health concerns. It is important to practice pest management strategies in order to maintain pest populations below economically damaging levels, as well as minimize the harmful effects that come with pest control on human health and environmental resources. Under organic management, facilities must use a tiered approach, exhausting certain methods of pest management prior to using others. All pest management activities should be described in the Organic Plan and Application and documented on an on-going basis. NOP Citation: §205.271. The escalating levels of pest control in organic facilities under section 205.271 of the USDA National Organic Program are as follows:

Level	Examples	Pre-requisites or Restrictions
Level 1 (205.271(a))- Prevention and Exclusion	<ul style="list-style-type: none"> Remove Pest Habitats Maintain Good Refuse & Trash Management Ensure Pest Exclusion 	<ul style="list-style-type: none"> Mandatory Implementation
Level 2 (205.271(b))- Mechanical and Physical Controls	<ul style="list-style-type: none"> Glue Traps Mechanical traps Use of Natural/Nonsynthetic Repellants and Lures (Natural Oils, etc) Synthetic Lures and Repellants (Only if Specific Product is Listed in the National List of the NOP regulations) Electrical Traps Environmental Controls (Air Curtains, Temperature, Humidity, Etc.) 	<ul style="list-style-type: none"> Must Use Level 1 Prior to Use of Level 2
Level 3 (205.271(c)) Pesticides Specifically Listed in the NOP Regulations	<ul style="list-style-type: none"> Diatomaceous Earth Carbon Dioxide Sulfur Dioxide Boric Acid Pyrethrum Limonene Vitamin D3 Pseudomonas 	<ul style="list-style-type: none"> Must Implement Level 1 and Level 2 Practices First and Have Determined that Level 1 and 2 Are Insufficient to Control Pests (As Documented Through Continued Pest Sightings) Must Explain to Certifier How the Product Will Be Used in a Manner which Will Not Lead to Contamination of Organic Products and Ingredients and Receive Advance Approval for Use
Level 4 (205.721(d)) Other Pesticides Not Listed in the National List	All Other Synthetic Substances/Pesticides	<ul style="list-style-type: none"> Must Implement Level 1, Level 2, and Level 3 Practices First and Have Determined that Levels 1-3 Are Insufficient to Control Pests (As Documented Through Continued Pest Sightings) Must Explain to Certifier How the Product Will Be Used in a Manner which Will Not Lead to Contamination of Organic Products and Ingredients and Receive Advance Approval for Use



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1. Prevention and Exclusion: Pest management for organic producers and handlers who have storage and/or processing facilities is a multi-tiered system. The first step is using management practices to prevent problems before they occur. Keeping facilities sanitary, removing exterior habitat and food sources, mowing, sealing doors and windows, and creating physical barriers to prevent pests from entering are some examples of pest prevention practices.

2. Mechanical & Physical Controls: If problems persist in spite of the operator's best prevention efforts, pest controls such as sticky, mechanical, or pheromone traps may be used. Lures and repellents using nonsynthetic or synthetic substances consistent with the National List may also be used. (Note that if the mode of action is to kill the pest, the substance is not a lure or repellent, it is a pesticide).

3. Allowed Materials – Pesticide Controls Consistent with The National List: When prevention and mechanical/physical control methods are not enough, nonsynthetic and synthetic pest control materials that are consistent with the National List (Sections 205.601 and 205.605) may be used. To determine if a substance is consistent with the National List, check with Americert or consider exploring the resources at the bottom of this sheet. Even though a substance is allowed, it may not be approved to come into direct contact with certified organic products, land, or livestock. It is therefore important that the operator discuss their plan and methods of using these substances with Americert ahead of time. Americert allows the use of bait boxes outside the facility, if there is no risk of contamination of organic products.

4. Synthetic Materials Not Listed in the National List: If steps 1-3 are not effective in preventing or controlling pests, a synthetic substance not on the National List may be used, provided that the certified operator and Americert agree on the substance, method of application, and measures to be taken to prevent contamination of certified products. Prior to using a pest management substance not on the National List, you must first: Document the need to use that substance. Include the specific preventative measures you have taken, any relevant pest monitoring results, allowed materials you have tried, etc. Document your plan to protect organic integrity while using the substance, including the substance's name, where the substance will be applied, for how long, method of application, how organic product will be protected, and other important details.

Determining if Pest Control Products are Level 3 or 4:

Level 3 Products are Most* Substances Which Are Natural and Nonsynthetic AND Any Synthetic Substance Specifically Listed in Sections 205.601 or 205.605 of the organic regulations. (* Natural substances listed in section 205.602 of the regulations are not permitted, including arsenic, strychnine, and tobacco dust (nicotine sulfate).

Level 4 Products are Anything That is Synthetic and Not Specifically Listed in the organic regulations.

If in doubt, it is safer to consider a product a Level 4 substance until determined otherwise.