

## CERES Policy

### Pest Control in Processing Plants

1	<b>Aim</b>	Establish clear rules for pest control practices in post-harvest facilities, where organic food is processed or stored.
2	<b>Background</b>	Facility pest management can be even more complex than plant protection in the field. Solutions have to be found, which meet consumers' expectation of non-polluted organic food, but can at the same time be implemented by the companies with realistic efforts.
3	<b>Normative framework</b>	<p><b>EU-Regulation:</b></p> <p>Reg. (EC) 889/08: <i>"For the storage of products, areas shall be managed in such a way as to ensure identification of lots and to avoid any mixing with or contamination by products and/or substances not in compliance with the organic production rules. Organic products shall be clearly identifiable at all times."</i></p> <p>Besides this paragraph focusing on storage rooms, no specific provisions for processing facilities are included in the EU Regulation* on organic farming. Therefore, a common understanding is, that all pest control products and methods allowed for food processing in general are also allowed for processing of organic food.</p> <p><b>German Law on Plant Protection:</b></p> <p>According to this law, "plant protection" involves not only the protection of crops on the field, but also simple processing steps, like e.g. drying, freezing, milling, etc. According to this rationale, in establishments, which perform this kind of processing, only those substances could be used for pest control, which are listed in Annex II of Regulation (EC) 889/08, besides being registered for post-harvest treatments (which would be a very reduced number of products).</p> <p><b>NOP:</b></p> <p><b>§ 205.271 Facility pest management practice standard</b></p> <p><i>"(a) The producer or handler of an organic facility must use management practices to prevent pests, including, but not limited to:</i></p> <ul style="list-style-type: none"> <li><i>(1) Removal of pest habitat, food sources, and breeding areas;</i></li> <li><i>(2) Prevention of access to handling facilities; or</i></li> <li><i>(3) Management of environmental factors, such as temperature, light, humidity, atmosphere, and air circulation to prevent pest reproduction.</i></li> </ul> <p><i>(b) Pests may be controlled through:</i></p> <ul style="list-style-type: none"> <li><i>(1) Augmentation or introduction of predators or parasites for the pest species;</i></li> <li><i>(2) Mechanical or physical controls including, but not limited to, traps, light, or sound; or</i></li> <li><i>(3) Nontoxic, nonsynthetic controls, such as lures and repellents.</i></li> </ul> <p><i>(c) If the practices provided for in paragraphs (a) and (b) of this section are not effective to prevent or control facility pests, a nonsynthetic biological or botanical substance or a synthetic substance may be applied to prevent, suppress, or control pests ...</i></p> <p><i>(d) The handler of an organic handling operation who applies a nonsynthetic biological or botanical substance or a synthetic substance for the prevention</i></p>

		<p>or control of a pest must include in the organic handling plan a list of all measures taken or intended to be taken to prevent contact between the substance and any ingredient or finished product ...</p> <p>(e) ...must include in the organic handling plan an evaluation of the effects of repetitive use of the same or similar materials on pest resistance and shifts in pest types."</p> <p><b>JAS</b></p> <p>Notification 60, Art. 4: "The manufactured or processed organic agricultural product ...shall be controlled not to be polluted by the agricultural chemicals, detergents, disinfectant, and other drugs."</p>
4	<b>Terms, clarifications, abbreviations</b>	<b>Pest control, pest management:</b> Refers to prevention and control of harmful insects, mites, mammals, etc.
5	<b>Policy</b>	
5.1	<b>Basic considerations</b>	<p>a. The EU Regulation is vague concerning facility pest management. There is a certain contradiction between the EU Regulation and national legislation of EU member states, mainly due to different definitions of what is considered as "plant protection" (see 3). This leaves space for a wide range of interpretations, which is not satisfactory.</p> <p>b. We agree with the NOP approach, which gives priority to preventive measures, but allows use of non-synthetic and synthetic pesticides under certain conditions.</p> <p>c. Thus, both for NOP and EU certification, we apply the following requirements:</p>
5.2	<b>Requirements</b>	<p>a. We apply the hierarchical approach established in NOP §205.271 (Prevention → Mechanical or biological control, traps → Nonsynthetic substances → Synthetic substances) also for other organic standards (e.g. EU Regulation).</p> <p>b. Both synthetic and non-synthetic pest control substances must be applied in a way, which excludes contamination of organic food (see above NOP § 205.271, see also different GMP standards for pesticide application).</p> <p>c. Organic food must be removed from storage or processing rooms before synthetic pesticides are applied. Covering with plastic sheets, or similar, is not sufficient.</p> <p>d. After application of synthetic pesticides, the waiting time, before organic food is re-introduced into the respective room, must be doubled, as compared to the time established by the pesticide manufacturer. In case of doubts, CERES will require residue testing, to make sure that facility pest control is not a source of contamination of organic food.</p> <p>e. Surfaces, which enter in contact with food, must be washed with adequate soaps, and then rinsed with clear water, after pesticide use.</p> <p>f. Rodenticides can be used only in closed devices, whose location must be identified in a drawing accessible to all staff. Normally, a specialised company should place them on safe sites outside the facility.</p> <ul style="list-style-type: none"> <li>• The staff in charge of facility pest management is responsible for safeguarding the innocuousness of all measures, which are taken.</li> </ul>

\* **Note:** For the time being, products in third countries outside the European Union can be certified only as "equivalent to", not as "compliant with" Reg. (EC) 834/07. for further details, please see the CERES Policy on Third Country Certification.