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September 30, 2013

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2648-So, Ag Stop 0268  
Washington, DC 20250-0268

**RE: Docket: AMS-NOP-13-0049  
NOSB Compliance, Accreditation, and Certification Sub-Committee  
Discussion Document - Toward Clarifying ACA's Application of Clarifying §205.206(e)**

Dear Ms. Michelle Arsenault,

**Introduction:**

Oregon Tilth is dedicated to supporting and promoting biologically sound and socially equitable agriculture and food production. Oregon Tilth advocates a holistic approach to agricultural production systems. Oregon Tilth encourages growers to create farm systems, which improve soils and require minimal intervention for pest control. Tilth stresses prevention of pest problems through the use of crop rotations, the introduction of beneficial insects and field sanitation.

**Questions:**

***1. What activities or practices do you require of applicants and certified operators in their Organic System Plans (OSP) with respect to their compliance with §205.206(e)?***

Oregon Tilth requires a complete and applicable OSP be developed. It is expected that growers will be aware of controls for likely pests and diseases, which threaten their crops and livelihoods. Section C5 of Oregon Tilt's Crop OSP captures the five components common to most integrated pest management strategies:

- What pests are likely?
- How is this monitored?
- What measures are taken to prevent pests?
- How do you evaluate these measures?
- What conditions must be present before applying a material?

**2. What form of verification or records from the operator do you require in support of their compliance with § 205.206(e), either during review of the OSP, during the inspection, or upon the inspection review?**

Oregon Tilth requires organic operators to develop a complete OSP, which is pertinent to the type of production and crops grown. The Inspection Report specifically asks the inspector to verify that pest, disease, and weed management practices outlined in the OSP are being implemented. However, Oregon Tilth does not systematically require records that verify preventative and cultural practices were insufficient prior to using an allowed substance. Instead, compliance to § 205.206(e) is often evident when preventative and cultural control practices are being implemented and the operation is otherwise compliant with other applicable production requirements such as crop rotation and soil fertility.

**3. What information do you require when an operator needs to amend their OSP on short notice when pest pressure unpredictably or unexpectedly rises beyond their decision threshold?**

Oregon Tilth would request a written procedure outlining the pest, the control material, and the reason it is being applied. Provided that the material input is allowed and the control measures are reasonable, Oregon Tilth would approve their procedure and material and update their OSP. Farmers facing unexpected pest pressure require a timely decision. For that reason and because it is “unexpected” we approve the material on the condition that the operator include the new pest and applicable provisions of §205.206 with their next OSP update.

**4. Other than through records, how do you verify that approved substances are applied only when other, less toxic or aggressive means have been tried and found wanting?**

When pest control is necessary, Oregon Tilth urges growers to use non-toxic methods, leaving the strictly limited pesticides, which are available to Tilth growers to be used only when necessary to prevent crop loss. Oregon Tilth encourages just prudence through grower webinars, publications, and education. However, Oregon Tilth does not recommend one approved substance over another approved substance provided each comply with 205.206, applicable annotations on the National List and does not contaminate soil or water quality. Otherwise, Oregon Tilth depends on the NOSB to restrict or prohibit materials, which are toxic.

**Summary:**

Oregon Tilth encourages the NOSB through rulemaking that upholds the integrated pest management strategies embedded in the National Organic Standards. However, Oregon Tilth urges caution when setting prescriptive practices that require undue recordkeeping. Oregon Tilth believes that sustained participation in organic certification will only be maintained through respect and cooperation with farmers.

Respectfully Submitted,

Oregon Tilth

*Oregon Tilth is a nonprofit organization supporting and promoting biologically sound and socially equitable agriculture through education, research, advocacy, and certification. Oregon Tilth advocates sustainable approaches to agricultural production systems and processing, handling, and marketing.*