

Crop Production Recommendations -- 1994

NATIONAL ORGANIC STANDARDS BOARD FINAL RECOMMENDATION ADDENDUM NUMBER 2 BOTANICAL PESTICIDES POLICY

Date adopted: October 14, 1994
Location: Rohnert Park, California

Commentary

The National Organic Standards Board (NOSB) is charged with the responsibility of conducting a special review of botanical pesticides under Section 2119(k)(4) of the Organic Foods Production Act of 1990 (OFPA): "The Board shall, prior to the establishment of the National List, review all botanical pesticides used in agricultural production and consider whether any such botanical pesticide should be included in the list of prohibited natural substances."

The special review has been conducted with the following results:

10/13/94 Neem Motion to add to the Prohibited Natural List was defeated.

10/13/94 Nicotine Tabled while identity and review are re-established.

10/13/94 Pyrethrums Motion to add to the Prohibited Natural List was defeated.

10/13/94 Quassia Removed from consideration

10/13/94 Rotenone Motion to add to the Prohibited Natural List was defeated.

10/13/94 Ryania Motion to add to the Prohibited Natural List was defeated.

10/13/94 Sabadilla Motion to add to the Prohibited Natural List was defeated.

10/13/94 Strychnine Tabled until TAP reviewers are found to complete review.

10/14/94 Piperonyl Motion to add to the Approved Synthetic Butoxide list as a synergist for use with botanicals was defeated.

Additionally more TAP reviewers or clarifications of unclear points were requested for Rotenone and Ryania. More information on all the botanicals is still coming in and will be evaluated as it does.

This list of botanical pesticides is limited to those generic substances that are commonly known, registered with the EPA under FIFRA, and that have been used historically in organic crop production because of their documented insecticidal properties.

Recommendation

The Board maintains that prevention should be a producer's primary approach to pest management. Cultural and biological techniques must be given the highest priority by producers and be well documented in the Organic Farm Plan. Notwithstanding, the Board recognizes that when cultural and biological practices fail to provide adequate crop protection, the use of botanical pesticides can be an effective second line defense.

It is the position of the Board that producers who use botanical pesticides in organic crop production shall comply with the restrictions set forth below:

1. Botanical pesticides shall only be utilized within the context of a biorational pest management program and shall not be the primary method of pest control set forth in the Organic Farm Plan.
2. Producers shall utilize botanical pesticides in a manner which is least toxic and least ecologically disruptive.
3. All EPA label restrictions and directions need to be followed. This includes livestock, crops, target pests, safety precautions, pre-harvest intervals and worker re-entry.
4. In light of the fact that the Sunset Provision in Section 2118 of OFPA does not apply to Botanicals unless they are prohibited, and serious data gaps have been identified in some areas, the NOSB recommends that a comprehensive review of Botanicals occur within 5 years of implementation of OFPA.

Furthermore, the Board concludes that it is not possible to define the "cautious and judicious use" of botanical pesticides on a national basis, and therefore asserts its position that organic certifying agencies shall monitor the use of particular botanical pesticides as appropriate to local situations and shall assure that these recommendations are strictly adhered to. Additionally, certifiers may use their discretion on further restricting the pre-harvest interval beyond the minimum label requirements.