

UNRESOLVED ISSUES AND ADDITIONAL CONSIDERATIONS
FOR ESTABLISHING ORGANIC QUARANTINE STANDARDS

Briefing Paper prepared for the NOSB International Committee June 10, 1999

Issues related to establishing standards

1. *What criteria should AMS utilize when determining whether a quarantine treatment is compatible with organic certification?*

The traditional organic approach of allowing natural materials while prohibiting synthetic ones (with discretion for exceptions in both categories) provides a viable framework for evaluating materials. For example, the fumigation procedures which the USDA currently authorizes would be prohibited because the fumigants used - methyl bromide, phosphine, and sulfuryl flouride - are synthetic. However, there are a wide range of physical practices involving the regulation of temperature and/or the content of the atmosphere (manipulating the levels of oxygen, carbon dioxide or other gases) which provide effective quarantine control and have been traditionally allowed under organic certification standards. The NOP should identify the criteria it uses to determine which physical pest control practices it will allow for quarantine control. Such criteria will be especially important for distinguishing organic treatments from other physical practices, such as irradiation, which may become more widely applied to conventional commodities.

2. *How can AMS facilitate research and commercial adoption of quarantine treatments which it determines are compatible with organic certification?*

The Agricultural Research Service (ARS) conducts the preliminary analysis of quarantine treatments which APHIS relies upon to determine whether a particular practice is viable. While ARS has committed resources to physical quarantine practices which are organically certifiable, it has no specific mandate to do so. A dedicated effort to conduct research on certifiable practices would greatly facilitate future trade in organic commodities.

Issues related to implementing standards

3. *Can AMS work with APHIS to establish pre-clearance programs compatible with organic certification within the country of origin ?*

Pre-clearance means inspection and treatment of items onsite in foreign countries to prevent harmful exotic pests and diseases from entering the United States. APHIS personnel stationed in the country of production are responsible for documenting that commodities are inspected and approved for entry into the United States at the time of shipment. These procedures prevent backlogs of product awaiting inspection developing in the United States. The NOP could develop a working relationship with APHIS to include consideration of organic certification in pre-clearance programs.

4. *Without imposing excessive paperwork and reporting requirements, what type of*

documentation is sufficient to insure the organic integrity of a certified commodity throughout the chain of custody?

Many retailers of organic commodities have found it difficult to document that specific lots of imported commodities have not been treated with a prohibited quarantine treatment. The Animal and Plant Health Inspection Service (APHIS) is the division of USDA with jurisdiction over the handling and documentation of quarantine decisions at the point of entry. The paperwork which accompanies each shipment into the United States is adequate to determine whether and how a particular commodity was treated for quarantine purposes. The NOP will need to consider, probably through standards pertaining to handling operations, how to document in a timely manner the quarantine status of particular

5. *How can standards be used to prevent commingling of certified commodities which are treated at quarantine facilities which also handle conventional product?*

All quarantine treatments must be conducted at APHIS approved facilities which typically handle both certified and conventional commodities. The NOP will need to establish guidelines, probably through the organic handling plan, to address the risk of commingling.