



The Equitable Food Initiative Auditor Guidance for Assessing PM 1.3

VERSION 1.1, NOVEMBER 3RD, 2017

Contact Details

Equitable Food Initiative

1875 Connecticut Ave NW

10th Floor

Washington, DC 20009

USA

www.equitablefood.org

Email: info@equitablefood.org



Responsibility for these Requirements

The EFI Standards Committee has responsibility for this document, and will periodically review and update it.

Users should verify that they are using the latest version by checking on the EFI website at: www.equitablefood.org.

Versions Issued

Version No.	Date	Description of Amendment
v1.0	February 24 th , 2017	First public-facing version
v1.1	November 3 rd , 2017	Added guidance for assessing PM 1.3 in a greenhouse. The branding of the document updated to meet current EFI requirements.

Part A: Assessing PM 1.3 on Certified Organic Operations

1 Introduction

EFI Indicator PM 1.3 requires that a risk analysis be generated from the Pesticide Risk Tool (PRT). The intent is to provide Growers with additional information that can help them make pest management decisions that favor lower risk pesticides when pesticides are used. Since there are only a limited number of organically-approved pesticides which have a medium risk profile, EFI is offering, through this guidance, an alternative mechanism for certified organic growers to be assessed for conformance with PM 1.3.

2 Applicability

This alternative mechanism applies to:

- A Grower who currently holds in good standing an organic certificate recognized by the National Organic Program of the United State Department of Agriculture (USDA).
- Crops that are included in an EFI audit that are also named on an organic certification meeting the requirement above.

3 Implementation

3.1 *Qualifying the Certificate*

- 3.1.1 The auditor shall confirm, using the [USDA Organic Integrity database](#), that the organic certificate presented by the Grower is not surrendered, suspended, or revoked.
- 3.1.2 The auditor shall cross-check which of the certified organic crops shown on the USDA database are also in-scope of the EFI audit.

3.2 *Verifying Post-Organic Certification Practices*

- 3.2.1 The auditor shall review pesticide application records from the effective date of the Organic Certificate to the date of the EFI audit to verify that no substances were applied to the in-scope crops which, according to the current version of [The National List of Allowed and Prohibited Substances](#), would be out of conformance with the Organic Standards.
 - 3.2.1.1 If a prohibited substance is verified to have been applied to an in-scope crop, the Organic Certificate is considered disqualified for this alternative mechanism and PM 1.3 shall be assessed per normal EFI requirements.

3.3 *Documenting the Findings*

- 3.3.1 Upon qualifying the organic certificate and verifying the post-organic certification pesticide application records meet the conditions of Section 3.2.1, the auditor can make a finding of Conformant for PM 1.3.
- 3.3.2 The objective evidence to support this finding shall include the NOP ID of the qualified organic certificate, the effective date of the certificate, and the Certifier.

Part B: Assessing PM 1.3 in a Greenhouse

1 Introduction

Currently, the Pesticide Risk Tool (PRT) is formulated to perform a risk analysis for open field operations. Risks to humans and the environment may increase or decrease in a greenhouse environment, but those specific calculations are not able to be made by the PRT. In light of that, EFI is providing relief from the use of the PRT in order to conform with PM 1.3 for certain greenhouse operations.

2 Applicability

To qualify, all production in-scope of the EFI certificate must be grown inside a greenhouse. The operation cannot have used any pesticide appearing on the [PAN International List of Highly Hazardous Pesticides](#) (HHPs) Group 1 (acute toxicity) or Group 2 (long-term human health effects) from the time of the initial EFI Leadership Team training. In addition, the operation should not anticipate using a Group 1 or Group 2 pesticide at any time while EFI certified. If the operation has, or anticipates, using a Group 1 or Group 2 pesticide, then PM 1.3 shall be audited per normal procedures.

3 Implementation

If a qualified operation meets all of the requirements below, then the PRT does not have to be used:

- The PM 1.1-conformant IPM plan lists pesticide products, application rates, and methods for all anticipated applications, and includes specific efforts to reduce pesticide use, aggregate toxicity, and potential for exposure to workers and environment, e.g., do spray applications have potential to drift through vents, runoff in drains, or leach through a permeable floor? What personal protective equipment and re-entry intervals are used to reduce exposure to workers?
- Complete application records are available for inspection and list any and all pesticides used (including formulations, dates, application rates, application site, application method, and applicator name for all applications) and are signed by a licensed Pest Control Advisor where regulations require it.
- Documentation required by Sections
 - The above two items are provided to EFI with the submission of the draft audit report.

In these cases, the auditor shall mark PM 1.3 as Conformant and shall document as evidence how the protocol requirements were reviewed and found to be compliant. The auditor shall also collect the primary documentation from the Grower and include it with the submission of the draft audit report to EFI.

If, in the review of application records in the assessment of protocol item 2, it is found that a Group 1 or Group 2 pesticide has been used, the auditor shall revert to normal audit procedures for PM 1.3. If chemicals/pesticides in PAN Group 1 or Group 2 are used on site, ONLY the chemicals/pesticides classified in these groups are to be entered into the PRT. All other chemicals/pesticides do not need to be entered.