USDA Agricultural Marketing Service

1400 Independence Avenue, SW
Room 3071-S, STOP 0201
Washington, D.C. 20250-0201

September 11, 2017

Whitney Qualls, MS, Ph.D.
Medical Entomologist
Texas Department of State Health Services
1100 West 49th Street
Austin, Texas 78756
Transmittal by email: Whitney.Qualls@dshs.texas.gov

Dear Dr. Qualls:

On Friday, September 8, the U.S. Department of Agriculture (USDA) received an inquiry about the allowance for Federal and State emergency pest or disease treatment under the USDA organic regulations.

The USDA organic regulations include a section that allows for Federal and State emergency pest or disease treatment. Texas has initiated such a treatment program to treat for mosquitos following Hurricane Harvey. The Centers for Disease Control and Prevention (CDC) Division of Vector-Borne Diseases informed USDA that the spraying of Naled will not result in a detectable presence on the ground, plants, or animals. Based on this information and the need for emergency pest and disease treatment, in this case, the USDA does not consider the specific type of treatment being used to be an application that would impact the organic status of certified organic crops and livestock.

This allowance is based on information provided by the CDC about Naled, and based on the application process described as being used by the Department of Defense (DoD). This determination that this is not considered an application for the purposes of organic certification is limited to this substance, applied in the manner described by CDC and DoD, and under the circumstances of this case.

The USDA stands ready to consult further with our Federal and State partners if new circumstances emerge requiring a separate evaluation.

Sincerely,

Bruce Summers
Acting Administrator

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