

# Birds Eye Fresh's PESP Strategy

## **Describe your Organization's Five-Year Goals Related to Pesticide Risk Reduction**

Design, develop, implement, and evaluate a pesticide risk reduction program that will be documented by using a formal certification program of growers participating in the Birds Eye Fresh marking program. The certification program will consider actions already taken by partners but will require additional effort. Program implementation is expected to take three to five years. Birds Eye Foods is the sole proprietor of this program and is ultimately responsible for the design, development, implementation and evaluation.

Based on peer review, focus group interviews, one-on-one interviews, expert opinion and proprietary research, an annual evaluation tool will be implemented that identifies and describes at least four quantifiable components (modules) of a pesticide risk reduction program; 1) integrated pest management, 2) soil health and quality, 3) environmental, and 4) farm security. The evaluation tool will be administered as both a self assessment and third party observation and will utilize checklists, written comments, and verification (sources of evidence) for these components. Results will be aggregated and used in analysis and documented in the form of a written report that will describe, measure, and assess compliance and gaps within the pesticide risk reduction program.

## **What do you envision doing (broadly) to try to resolve your major issues?**

The written report will be used as a basis for planning, operations management, capital replacement, and identify needs for further research, partnerships, and continuing education for the farm operation. The evaluation process will be repeated on an annual basis to assess, describe, and further identify areas for improvement in order to achieve full compliance within these four components. Ultimately, the evaluation tool and written report will provide transparency to the public and document benchmarks areas for further research, development, and continuing education that the EPA and its partners may be able to facilitate and provide in furtherance of a pesticide risk reduction program.

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## **Goal 1 and Tactics**

To the fullest extent reasonable the use of integrated pest management is the basis for management decision components based on the use of weed, insect, disease, and soil maps. These maps will also serve as the basis for quantifying and assessing crop management as to extent, availability and acreage. Scouting of fields, use of IPM methodology – thresholds will be used for specific crops and IPM Element guidelines will be adopted each crop.

Environmental Impact Quotients (EIQs) will be calculated and considered in determining pest management practices. Certified Crop Advisors, pesticide applicators and other

relevant field personnel will receive the latest training and updated crop histories to be used in decision making in order to minimize pests and maximize beneficial processes. Cultural practices include crop rotation, cover crops, trap crops, wildlife buffers; mechanical includes disking, plowing, flame, traps, hand, mowing, screening; chemical includes petroleum based, botanicals, organic; and, the use of a biological beneficial such as wasp or fungi.

More specifically:

- Farm operations will be in compliance with federal, state, and local legal requirements pertaining to pesticide and nutrient applications, and employee health and safety.
- Complete, legible nutrient application records will be maintained.
- IPM element information, guidelines, and decision making resources will be used for each crop and documented and maintained by the farm operation for at least three years.
- Key pests will be identified and understood (those which usually require action to prevent economic losses).
- Both effective non-chemical and chemical strategies will be identified to prevent losses by each key pest.
- Farm operations will utilize scouting, sampling and monitoring techniques for all key pests.
- Science-based action thresholds will determine when to take action for each key pest.
- Pesticide inputs are tracked and amounts used reported and reduced to minimum amount needed for a successful crop.

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## **Goal 2 and Tactics**

Implement and utilize a soil health & quality program based on fertility testing, general and grid sampling pH testing, nitrogen testing, compaction testing, and soil microbial activity monitoring. Organic levels will be a management objective and rely on the use of green manure and crop residue. Only composted animal manure will be used when deemed necessary and reasonable.

More specifically:

- Soil erosion is managed and minimal through the use of sound agricultural practices as suggested by USDA: NRCS and/or resident state Department of Agriculture.
- Visibly eroded areas around plants and production sites are not present or are extremely limited in size and number with corrective measures in place.

- Where threat of soil erosion exists from wind or water, protective measures are part of a whole farm plan and implemented Farm operations identify, track and report on key soil quality indicators in field production areas.
  - Farm operations implement sound agricultural practices to improve/maintain soil quality.
  - The farm operation utilizes a nutrient management plan.
  - The farm operation has an agricultural and environmental management plan in place.
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### **Goal 3 and Tactics**

Comply with environmental regulations and concerns. Implement environmental practices including waste minimization, natural resource conservation through sustainable land use, pollution prevention, tractor pans, chlorine usage, identification and safety of environmental areas of concern, through the use of buffer strips, sediment control ponds, wetlands, wind breaks, wildlife habitat improvement.

Recycling of agricultural plastics, paper, wood, oil, antifreeze, package reduction, and practices solid waste reduction. Air emission reductions will be achieved; no burning and low ammonia emissions. Water quality and conservation through testing and efficient irrigation, water saving devices, strategies, drip, monitoring.

More specifically:

- Biosolids and raw animal manures are not directly used on fields for growing vegetable and/or fruit crops.
  - Untreated sewage is never used.
  - Improve field operations energy use (carbon foot print) by implementing conservation measures and transition to renewable energy sources.
  - Improve efficacy of pesticide use and field production energy use by implementing measures such as: tractor auto-steering to reduce trips across field; improving energy efficiency of irrigation pumps; undergoing energy use audit and implementing recommendations.
  - Design, develop and implement a sustainable land use and conservation policy.
  - Farm tracks and decreases amounts and types of pesticide materials whenever possible for respective crops.
  - Farm operations set and meet goals for improving sustainability indicators as outlined in land use and conservation plans.
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## Goal 4 and Tactics

Implement a pesticide security and emergency management program based on physical farm security principles which will emphasize the use of check lists, approved supplier and vendor policy, visitor log and check in policy, emergency response plan, and employee training.

More specifically:

- Emergency telephone numbers and points of contact (including ambulance, police, FBI, spill response) are current and prominently displayed at each telephone and other key areas.
- Employees are trained on how to handle threats and incidents involving pesticides/ written response procedures are provided.
- Background security checks are conducted on employees prior to hiring and periodically for jobs involving pesticides and other precursors identified by Department of Homeland Security.
- A policy will be in place by which employees scrutinize, question, and limit unwelcome contractors or visitors to the facility.
- All chemical and other supply deliverers will be required to show proper identification and to sign in.
- Emergency management plans are available, updated and exercised for pesticide and nutrient spills, chemical and fertilizer drift, and hazardous materials management.
- Periodically, farm operation reviews updates, and exercises all emergency management plans. Sensitive/vital areas of the operations are restricted to authorized personnel only.