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This comment pertains to the USDA advance notice of proposed rulemaking (ANPR) on “inert” ingredients used in organic production. Based on the recommendation of the National Organic Standards Board (NOSB), the agency postponed the evaluation of so-called “inert” ingredients until active materials had been reviewed for the National List of Allowed and Prohibited Substances. The issue became critical when the Environmental Protection Agency (EPA) announced that it was no longer supporting the lists to which NOP regulations refer—16 years ago. Further delay is unreasonable and unacceptable. The USDA must publically recognize that “Inert” ingredients are not biologically or chemically inert. I refer you to the Beyond Pesticides report “‘Inert’ Ingredients in Organic Production” compares the toxicity of active substances and “inert” substances used in organic production. In almost every category, there are more harmful “inerts” than active substances. I also refer you to the unfortunately not rare process of companies disposing of toxins as ‘inerts’ in other products. OFPA allows the use of a synthetic substance in organic production only if on the National List “by specific use or application” based on a recommendation by the NOSB, following OFPA procedures. The NOP must immediately act on repeated NOSB recommendations to evaluate individual “inerts”. The first step must be the immediate publication in the Federal Register of all “inerts” known to be used in organic production, with a demand that registrants of products approved for use in organic production notify AMS if their products contain other “inert” ingredients. USDA must allocate resources needed to review substances identified. Former List 3 “inerts” must be relisted according to the Spring 2012 NOSB recommendation. USDA must immediately establish a process to produce technical reviews of substances on former Lists 4A and 4B. The NOSB must complete the evaluation of all “inerts” within five years of publication of the list, and USDA must complete rulemaking in accordance with OFPA and NOSB recommendations. The use of endocrine disrupting and persistent organic pollutants—such as nonylphenol ethoxylates (NPEs), per- and polyfluoroalkyl substances (PFAS), bisphenols, and ortho-phthalates—must be banned. All materials must be subject to sunset review every five years, immediately if new data from any source indicate potential issues with a substance.