Gary Gover

The Organic Foods Production Act (OFPA) requires that no synthetic substance may be used in organic production unless evaluated and recommended by the NOSB and entered on the National List, which is contained in NOP regulations. "Inert" ingredients are not biologically or chemically inert. 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.OFPA allows the use of a synthetic substance in organic production only if it is listed on the National List "by specific use or application" based on a recommendation by the NOSB, following procedures in OFPA. Therefore, publish in the Federal Register the list of all "inerts" known to be used in organic production, with a request that registrants of products approved for use in organic production notify AMS if their products contain other "inert" ingredients. Allocate resources needed to review substances that are identified. Former List 3 "inerts" must be relisted according to the Spring 2012 NOSB recommendation. USDA must establish a process for production of technical reviews of substance on former Lists 4A and 4B. The NOSB must evaluate the substances according to a process designed to complete the review of all "inerts" within five years of publication of the list, and USDA must complete rulemaking in accordance with OFPA and NOSB recommendations. Known endocrine disrupting and persistent organic pollutants—such as nonylphenol ethoxylates (NPEs), per- and polyfluoroalkyl substances (PFAS), bisphenols, and ortho-phthalates—should not be permitted. Every five years the materials will be subject to sunset review.