Allan Peterson

The U.S. Department of Agriculture (USDA) must follow through on its duty to assess individual "inert" ingredients used in organic production. The term "inert" has long been used as a shield to protect full disclosure and potential liability. It is knowing used to mislead. Many of the so-called inerts have been allowed without the required testing for risk. As an excuse for putting off the required action, USDA refers to time, effort, and work required to implement the NOSB's recommended reviews of individual "inert" ingredients. These references are disingenuous at best, considering the time that has elapsed since the issue became critical when the Environmental Protection Agency (EPA) announced that it was no longer supporting the lists to which NOP regulations refer—almost two decades ago.No more delays. USDA must establish a process for production of technical reviews of all "inerts." Endocrine disrupting and persistent organic pollutants—such as nonylphenol ethoxylates (NPEs), per- and polyfluoroalkyl substances (PFAS), bisphenols, and ortho-phthalates—should not be permitted. Thank you for the opportunity to comment on this issue. My family and the families of millions of Americans depend on Organic to mean Organic.