

## Barbara Schwartz

The National Organic Program Must Evaluate Undisclosed “Inert” Ingredients Used in Organic Production

I understand that allowing some pesticides, and inert ingredients in these pesticides is a compromise. There are rules and timetables to evaluate pesticides and their inert additions. I, as a consumer, don't want pesticides and inerts used at all in production of my organic food. Since there is this compromise, please do the most you can to make sure these inert additives are safe for people and the environment, which is what I understand you are doing and are supposed to do. Please Do Not Delay. We are depending on you to keep us safe. Also, please do not let the producers hide the inert ingredients used. They must be disclosed so you can test for their safety. We all have a choice at this point in time. People who want Organic should be able to purchase Organic food. Since there is a large market for Organic Food, it is not fair, right or just for people to pretend to be Organic just to make money. I would like all my food without additives in the food or in producing the food. But since the Organic Label has this compromise, please do the work necessary to test all these additives. I believe they are called inert since they are not the active ingredient, but may be a helper ingredient in killing what the pesticide kills, but they might be harmful nevertheless. Inert doesn't mean benign. What I really would like, is no pesticides used at all in Organic production, and all the food grown in the Good Earth, and not hydroponically. I was happy to see the Organic Label, which I believed guaranteed the clean food I wanted to eat. I wish I could trust that label again, as I did when I first started looking for it on my purchases. Money is nice, but good health is more important. Thank you.

I agree with Beyond Pesticides below:

The first step must be the immediate publication in the Federal Register of all “inerts” known to be used in organic production, with a request that registrants of products approved for use in organic production to notify AMS if their products contain other “inert” ingredients.- USDA must 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.