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To whom it May Concern, •“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. •The NOSB has repeatedly passed recommendations telling NOP to evaluate individual “inerts.”