

## wendy ward

I have long wondered about the term, inert ingredients, whether in an organic or toxic product. Especially for organic use, it is time to assess and disclose these ingredients, especially pursuing and disclosing how these 'inert' ingredients act and amplify when combined with 'main' ingredients. In moving forward, there must be no more delay:- 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.