

Ron Hollis

The National Organic Program must evaluate “inert” ingredients used in organic production. Do not postpone the evaluation of so-called “inert” ingredients until active materials have been reviewed for the National List of Allowed and Prohibited Substances. In this context, “inert” is a misleading legal term since the ingredient may be chemically or biologically active, but not included for purposes of attacking a target organism. The first regulation and all subsequent revisions have allowed the use of “inert” ingredients on EPA’s former Lists 4A (“minimal risk inert ingredients”) and 4B (“other ingredients for which EPA has sufficient information to reasonably conclude that the current use pattern in pesticide products will not adversely affect public health or the environment”). A limited number on List 3 (“inerts of unknown toxicity”) were allowed in pheromone products. 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.