

## Tracy Feldman

I am an ecologist and educator in North Carolina. I am writing to urge you to publish inert ingredients in pesticides for organic production. “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.” In moving forward, please do the following: 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.