

**NOSB Resolution**  
**From: National Organic Standards Board (NOSB)**  
**To: the National Organic Program (NOP)**

**Date:** October 30, 2020

**Subject:** Resolution on EPA List 4 Inerts

**NOSB Chair:** Steve Ela

**The NOSB hereby recommends to the NOP the following:**

In voting to relist EPA List 4 Inerts of Minimal Concern, the NOSB recognizes the vital importance of the substances included in this listing to the organic industry. However, in referencing a list that is no longer maintained, using a list on which no new substances can be added, and not allowing for review of individual or groups of materials, the use of List 4 ingredients on the National List is problematic and outdated. The NOSB recognizes

that a viable program allowing for the review and use of these substances must be created before this listing can be removed. Therefore, the NOSB asks that the National Organic Program do the following:

- 1) work with the NOSB to develop a viable alternative process that allows for the review of many of the substances presently on EPA List 4 and has minimal disruption to the organic industry;
- 2) for substances that do not meet OFPA criteria for listing, work to provide a sufficient period for industry to change formulations and receive regulatory approval for the new formulations;
- 3) coordinate regularly with the NOSB on progress to develop an alternative to the EPA List 4 Inerts of Minimal Concern that allows for stakeholder input and the removal of the reference to EPA List 4 inerts on the National List.

**NOSB Vote:**

Motion to accept the resolution urging the NOP to take action to resolve the listing for the EPA List 4 inerts on the National List of allowed and prohibited substances.

Motion by: Steve Ela

Seconded by: Jerry D'Amore

Yes: 15 No: 0 Abstain: 0 Absent: 0 Recuse: 0

Motion Passed