



National Organic Program

U.S. Department of Agriculture

Update NOSB-NOP-EPA Working Group on Inert Ingredients

National Organic Standards Board Meeting

October 30, 2014

Louisville, Kentucky



National Organic Program

U.S. Department of Agriculture

Working Group on Inert Ingredients

- **NOSB:** Jay Feldman, Zea Sonnabend
- **NOP:** Emily Brown Rosen, Lisa M. Brines
- **EPA:** Chris Pfeifer (BPPD), Kerry Leifer
(Registration Division, Inerts)



National Organic Program

U.S. Department of Agriculture

Background

- The Organic Foods Production Act of 1990 indicates that the National List may provide for the use of inerts in pesticides that are not classified by EPA as “inerts of toxicological concern”
- NOP definition of “inert ingredient” follows from FIFRA definitions (i.e., not necessarily chemically/biologically “inert”)



National Organic Program

U.S. Department of Agriculture

NOP Rule - National List

- List 4 – Inerts of Minimal Concern
 - Synthetic inert ingredients classified as List 4A and 4B by EPA are allowed in pesticides for organic use (§ 205.601(m) and § 205.603(e))
- List 3 inerts are allowed in passive pheromone dispensers only (§ 205.601(m)(2))
- Both are subject to sunset review, List 4 must be renewed or changed by October, 2017



Issue

- EPA put inerts into lists according to toxicology and use pattern
- EPA revised system of assessment in 2006 and no longer uses or maintains Lists 1-4
- NOP is operating with obsolete list of inerts, last updated August 2004
- Manufacturers are petitioning for use of inerts that do not appear on the old lists



National Organic Program

U.S. Department of Agriculture

Timeline of actions

- April 2010 initial NOSB recommendation
 - Proposed to work with EPA for review of inerts
 - Various options for review and listing
- Oct 2010 - NOSB renewed List 4 inerts due to sunset in 2012
- Dec 2010, IWG established
 - EPA members indicated that review would need to be under USDA/ NOSB auspices



National Organic Program

U.S. Department of Agriculture

Timeline of actions (cont'd)

- October 2012, NOSB recommendation
 - proposed policy to review all known inerts by groups, with individual inclusion on National List
- Oct 2012 - May 2013
 - IWG developed lists of known inerts, grouping for review
 - IWG developed plan for public notification and comment



National Organic Program

U.S. Department of Agriculture

Timeline of actions

- May 2013-April 2014
 - NOP met with EPA staff, Design for the Environment
 - A voluntary label program for safer chemical products
 - Publishes a Safer Chemical Ingredient List
 - Detailed criteria also published

<http://www.epa.gov/dfe>



Look for the label!



Timeline since April 2014

- OGC reviewed the concept of collaborating with EPA
- NOP provided more background to DfE
- Planning for interagency meetings



National Organic Program

U.S. Department of Agriculture

Next steps

- NOP and EPA will meet further to develop plans for collaboration
- NOP will consult with NOSB on options
- Public notice will be given via Federal Register
- NOP is providing Crops Subcommittee with a TR for one category of List 4 inerts
 - Nonylphenol ethoxylates (NPEs)



National Organic Program
U.S. Department of Agriculture

Questions?

