



**National Organic Program**

U.S. Department of Agriculture

# Inert Ingredients for Use in Organic Production

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National Organic Standards Board Meeting  
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## 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” is derived from EPA-FIFRA definition (i.e., substance other than active ingredient intentionally included in pesticide products)



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# 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 reviewed by October 2017, List 3 by Oct. 2018



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## Issues

- EPA categorized inerts into Lists 1-4 according to toxicology and use pattern
- NOSB recommended in 1999 to allow EPA List 4
- 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



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# NOSB Recent History

- 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 Office of Pesticide Programs members indicated that review would need to be under USDA/ NOSB auspices



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### NOSB History (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



## NOP actions

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



Look for the label!



[epa.gov/saferchoice](http://epa.gov/saferchoice)

<http://www2.epa.gov/saferchoice/safer-ingredients>



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### NOP April 2014- present

- USDA Office of General Counsel reviewed the concept of collaborating with EPA
- NOP provided more background to DfE
- Several meetings with team from EPA-DfE





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### Next steps

- NOP would like NOSB to review the Safer Choice SCIL program and consider referring to it for inerts review.
- Crops SC and Livestock SC will review the current List 4 reference as part of 2017 sunset review
- CS and LS – aided by Inerts Working Group – may draft alternate language proposal to replace current references to List 4 and List 3- for fall 2015 meeting
  - Options could include reference to EPA Safer Choice SCIL list,
  - Allow for individual petitions also



## Next steps

- NOSB Reviews EPA Safer Choice Criteria
- Compare to OFPA criteria
  - EPA criteria is comprehensive regarding environmental and health impacts
  - NOSB could additionally provide oversight review for other OFPA criteria regarding compatibility and alternatives.
  - NOSB would continue to provide oversight review of EPA SCIL program at each sunset period.



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