



October 1, 2020

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National Organic Standards Board
USDA-AMS-NOP
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Submitted via [Regulations.gov](https://www.regulations.gov).

RE: Docket # AMS-NOP-20-0041

NOSB Livestock and Crops Subcommittees: Sunset 2022 EPA List 4 Inerts of Minimal Concern

Dear NOSB members:

Thank you for the opportunity to provide comments on the 2022 Sunset review [Livestock](#) and [Crop](#) subcommittee recommendations for EPA List 4 - Inerts of minimal concern. MOSA certifies approximately 2200 organic operations throughout the United States. Many of these certified operations use materials with inert ingredients and would be impacted by a different review requirement for inert ingredients. Almost 600 materials in pesticide categories are in use by MOSA clients. We appreciate the effort to encourage action on updating the lists we reference with lists that are currently being maintained. Current inert reference lists have been outdated for a long time and we echo our previous encouragement for the NOP to move forward on the October 2015 recommendations.

We agree wholeheartedly with the sentiment of the Livestock Subcommittee.

Though a path forward is well-defined, the timeline required to enact the 2015 recommendation is likely a lengthy one. Many EPA List 4 inerts used in compliant crop and livestock input formulations also appear on the EPA Safer Chemicals Ingredient List (SCIL), thus providing a viable transition to this more relevant list. Other inputs with inerts of known toxicity or other concerns would not move to the SCIL list and require reformulation and the subsequent registration and approval that is required of new regulated inputs. Ultimately, the reformulation of inputs to safer ingredients is a positive direction in which to move, one which meets consumer expectations and strengthens the integrity of the organic label. However, removal of the EPA List 4 reference with no immediate substitute will in the interim cause potential disruption to organic operations that rely on materials formulated with these inerts, removing essential tools in an already limited toolbox.

We support the direction outlined by the Livestock subcommittee but **do not support** the direction of the Crops subcommittee - to remove inert ingredients without beginning movement

on the replacement list. We feel a unified approach is necessary, and our preferred approach is NOSB cross-committee collaboration on inert ingredients. Many materials are used on both crops and livestock operations, and review requirements should be consistent. To recommend relisting of the inert ingredients found in Livestock products but not in Crop products would require us to review the same inputs to two different requirements, which is impractical and burdensome.

We encourage the NOP to take up the previous recommendation and the NOSB to maintain current National Listings in the meantime. Thank you for your work to encourage that forward action continues with the previous NOSB recommendation. Updated reference lists are necessary. We also would really appreciate the [petitioned substances page](#) be kept up to date with current documents for the public's consideration. It would be easier to follow conversations spread across several NOSB meetings with a single reference point.

Thank you for your work on this topic.

Respectfully submitted,

The MOSA Certification Team