



BEYOND PESTICIDES

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September 10, 2012

National Organic Standards Board
Fall 2012 Meeting
Providence, RI

Re. “Inert” ingredients (Crops)

Beyond Pesticides, founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers and farmworkers, advances improved protections from pesticides and alternative pest management strategies that reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and groups around the world.

We congratulate the Inerts Working Group and the Crops Subcommittee on creating a workable policy and procedure for finally meeting the legal obligation to subject so-called “inert” ingredients to the criteria of the *Organic Foods Production Act*. Ingredients of pesticide products that are labeled as “inert” are generally not physically, chemically, or toxicologically inert. They serve many functions, often increasing the toxicity of the “active” ingredients. They usually make up the largest part of the pesticide formulation. Some materials that are labeled as “inert” in one product are “active” in another product. The use of a word that commonly means “harmless” has led policy makers and the public to discount the problems that might be caused by these chemicals.

So, it is truly heartening to see this proposal come to the NOSB with the unanimous support of the Crops Subcommittee —the subcommittee that will do the bulk of the work under the proposed procedure. We encourage the subcommittee to begin work as soon as possible, and we encourage the National Organic Program to support the work of the subcommittee, requesting more resources as needed.

Thank you for your perseverance in the long process of developing this proposal.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors