



CCOF

Organic Certification

Education & Outreach

Political Advocacy

Promotion

Ms. Michelle Arsenault
Advisory Committee Specialist
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW.
Room 2642-So., Mail Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-15-0037; NOP-15-11

Re: Crops and Livestock Subcommittees, Proposed Annotation Change, EPA List 4 on 205.601(m) and 205.603(e)

October 7, 2015

Dear Ms. Arsenault and NOSB:

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on inert ingredients. CCOF advances organic agriculture for a healthy world through organic certification, education, advocacy, and promotion. Founded in 1973, CCOF certifies more than 3,000 certified operations in 41 states and three countries, covering 2.1 million acres of productive farmland.

Many CCOF members use registered pesticides approved for organic production that contain unknown "inert" ingredients.

CCOF supports the proposed annotation change because the existing language references EPA lists that no longer exist for reference. The annotation change should ensure that only the safest and most thoroughly reviewed ingredients are used in organic crops and for organic livestock.

CCOF's primary concern regarding a new method for reviewing inerts is that it wants to ensure that the new method causes minimal disruption to the quantity and quality of organically approved pest control materials available to producers. If specific materials originally classified as inert will be removed from the list, then there should be a sufficiently long phase-out period so products can be reformulated and the new formulation can go through the EPA registration process.

NOSB received relatively few comments regarding the annotation change for inerts at the spring 2015 meeting, which suggests most manufacturers and distributors of these products are not aware of the effort to make the annotation change. NOP should make a special effort to conduct outreach regarding the annotation change so that formulators have adequate time and information to reformulate products.



If NOP works with the Safer Choice Program on material reviews, then NOP should first carefully vet the program. Notably, most of Safer Choice Program's expertise is evaluating industrial and household cleaning products rather than agricultural inputs. NOP should ensure that program skills are transferable to evaluating agricultural materials.

CCOF encourages the Crops and Livestock Subcommittees to develop a formal proposal that requires NOSB to periodically identify and review gaps between the Safer Chemical Ingredient List (SCIL) and NOSB criteria.

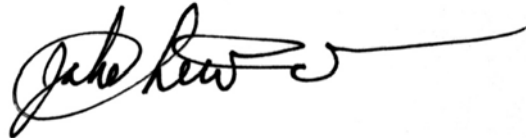
CCOF supports the portions of the annotation change that exempt FIFRA section 25(b) products and that bring the inerts in pheromone dispensers under the same listing as the other inerts.

Thank you for taking the time to review this material. Please contact us for further information or clarifications.

Sincerely,



Cathy Calfo, Executive Director/CEO



Jake Lewin, President, CCOF Certification Services LLC

