



BEYOND PESTICIDES

701 E Street, SE ■ Washington DC 20003
202-543-5450 phone ■ 202-543-4791 fax
info@beyondpesticides.org ■ www.beyondpesticides.org

March 1, 2013

National Organic Standards Board
Spring 2013 Meeting
Portland, OR

Re. CS: "Inert" ingredients

These comments are submitted on behalf of Beyond Pesticides. 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 (IWG) and the Crops Subcommittee (CS) 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.

We urge the IWG and CS to begin the process of reviewing these substances as soon as possible. At this point, if there are problems with the process, they are most likely to be revealed in practice.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is fluid and cursive, written over a white background.

Terry Shistar
Board of Directors