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Evaluation of Pesticide Materials for Organic Operations

The NOP has recently released the following information and policy on inert ingredients used in pesticide¹ materials for use by organic operations²:

I. Background from the NOP Website

The National Organic Program (NOP) regulations currently allow use of inert ingredients which appear on the Environmental Protection Agency (EPA) *List 4A – Minimal Risk Inert Ingredients* and *List 4B – Other ingredients for which EPA has sufficient information to reasonably conclude that the current use pattern in pesticide products will not adversely affect the public health or the environment* – in a variety of applications, primarily as pesticides in organic production operations. These lists are maintained and managed by EPA.

EPA has been reassessing the materials on the List 4, which has resulted in the revocation of several List 4 inert ingredients. This means that the following revoked ingredients are now prohibited under NOP:

- Acetylated lanolin alcohol (CAS Reg. No. 91994-94-4)
- Acrylic acid methyl ester, polymer with acrylonitrile and 1,3-butadiene (CAS Reg. No. 27012-62-0); the tolerance exemption is called “Nitrile rubber modified acrylonitrile methylacrylate conforming to 21 CFR 177.1480.
- Coumarone – indene resin (CAS Reg. No. 63393-89-5)
- Manganous oxide (CAS Reg. No. 1344-43-0)
- Pentaerythritol monostearate (CAS Reg. No. 78–23–9)
- Pentaerythritol tetrastearate CAS Reg. No. 115–83–3)
- Polyglyceryl phthalate ester of coconut oil fatty acid (CAS Reg. No. 66070-87-9);
- Sodium fluoride (CAS Reg. No. 7681-49-4)

EPA has also reclassified a number of List 3 inert ingredients (inerts of unknown toxicity) as List 4 inert ingredients. However, these materials have not been reviewed and approved for use in materials used in organic operations. Furthermore, NOP advises that the “Inerts List” system and the EPA review and labeling program for determining the compatibility of pesticides with the NOP Regulation may no longer be compatible with the NOP Regulation. Going forward, the NOP will need to collaborate with EPA and the National Organic Standards Board (NOSB) to determine the most effective and efficient way to amend the NOP regulations accordingly.

¹ “Pesticides” include all materials used for pest, weed and disease control on certified organic and transitional fields.

² for the complete article go to

<http://www.ams.usda.gov/nop/NoticesPolicies/NOP5008ReassessedInertIngredients09-06-07.pdf>

II. QAI's Policy on the Assessment of Pesticide Input Materials

In light of this, QAI and all parties reviewing pesticide product ingredients for compliance with the NOP, are required to use EPA's August 2004 lists of approved List 4 inert ingredients, **minus the revoked inert ingredients**. Links to the aforementioned lists are as follows:

- List 4A - http://www.epa.gov/opprd001/inerts/inerts_list4Aname.pdf
- List 4B - http://www.epa.gov/opprd001/inerts/inerts_list4Bname.pdf

QAI will no longer be able to accept affidavits that state that inerts are compliant with EPA List 4. QAI will be requesting detailed Information on all pesticide inputs, including the complete Information on the Inert Ingredients. Input manufacturers may communicate with QAI directly to protect proprietary Information. Alternatively, input manufacturers may choose to have their inputs certified through an NOP-accredited organization or similar organization and QAI will work with these organizations to verify compliance.

This policy will remain in effect until superseded by regulatory changes or new guidance from the NOP.