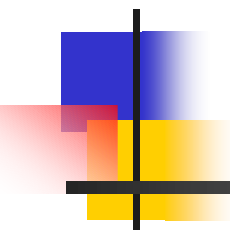




EPA's Role in the National Organic Program (NOP) – Inerts Edition



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EPA's NOP Role: An Overview

- EPA assists USDA
 - Compatible missions
 - Advancement of IPM and Biopesticides
- What EPA does
 - Reviews pesticides for NOP compliance
 - Certifies labeling claims
 - Shares technical knowledge
- EPA Standards of Review
 - Formulation
 - Uses
 - Labeling



Regulations and Guidance

- 1990 Organic Production Act
- 7 CFR Part 205 - The National List
- EPA's Pesticide Registration (PR) Notice 2003-1 (and EPA's Clarification)
- NOP Footnotes on the EPA Inert Ingredients Web-page



EPA Considerations for Inerts

- Manufacturing Process
- Product Chemistry
- Formulations
 - Ingredients must comply with National List
 - August 4, 2004 List 4 only
 - Common names and CAS #s must match
- Proprietary Mixes
 - 100% composition required in EPA database
 - Problems: Additives v. Reagents / Starting Materials
 - Exceptions: The ethanol example



Inert Ingredient Issues

- Dyes, antioxidants, and processed (e.g. ethoxylated) inert ingredients
- Mistakes are liability problems: angry customers, lost crops and lost reputation
- Make sure mixes are on file with the Inerts Branch
- Provide customers MSDS or tech sheets with full composition (Account for moisture, etc...)



List 4

- The August 2004 List 4 continues to apply
- Equivalency statements are not acceptable
- Non-List 4 inerts seeking to be NOP eligible must petition the NOSB
- The List system will expire.
 - It is too early to consider questions
 - No cause for anxiety



Contact Information

Feel free to submit questions regarding the NOP eligibility of inert ingredients for registered pesticide formulations to:

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