



Accredited Certifiers Association
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October 1, 2020

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

Re: Docket Number: AMS-NOP-20-0041
Crops and Livestock Subcommittee Sunset Reviews: EPA List 4 Inerts

Dear Ms. Arsenault:

Thank you for the opportunity to provide comments to the National Organic Standards Board (NOSB) Crops and Livestock Subcommittees sunset reviews of EPA List 4 Inerts. The Accredited Certifiers Association (ACA) is a 501(c)(3) nonprofit educational organization created to benefit the organic certifier community and the organic industry. The ACA strives to ensure consistent implementation of the USDA Organic Regulations through collaboration and education of accredited certification agencies. We are committed to upholding organic integrity and maintaining stakeholder trust to facilitate the growth of the organic industry. Our organization is made up of 63 USDA NOP accredited certifying agencies worldwide, which includes all 47 accredited certifiers headquartered in the United States. We are the frontline decision-makers for the effective implementation of the National Organic Program.

In the sunset review for EPA list 4 inerts, the Crops Subcommittee has voted 7-1 to remove this listing at §205.601(m), while the Livestock Subcommittee has voted to 2-4 to remove this listing. The ACA supports consistency in NOSB voting on these materials, and we support a vote to relist EPA List 4 inerts.

The ACA does not support removing the listing for EPA list 4 inerts from §205.601(m) without an alternative plan in place. This would result in the prohibition of many currently approved and widely used pesticide, herbicide, and disease products, which are otherwise compliant with the organic regulations. The magnitude of this ramification is unknown.

The ACA strongly encourages the NOP to take up the issue of EPA List 4 inerts. The ACA has many of the same concerns about EPA list 4 inerts as those detailed by the subcommittee. The [NOSB Recommendations Library Master File](#) lists the work on the 2015 NOSB proposal on this topic as "Outstanding," rather than "Complete" or "In Process," and we are disappointed by the NOP's inaction on this topic. We encourage a coordinated effort from the NOP and NOSB to



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address this issue and remove the listing for EPA list 4 inerts only when a viable alternative is in place.

Thank you for your continued work on this topic and for the ability to offer comments.

Sincerely,

Jennifer Berkebile

ACA Board of Directors Vice Chair
ACA Materials Working Group Facilitator
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