

CERES Policy

Inert ingredients under NOP

1	Normative frame	<p>§ 205.1 (Definitions): <i>"Inert ingredient. Any substance (or group of substances with similar chemical structures if designated by the Environmental Protection Agency) other than an active ingredient which is intentionally included in any pesticide product (40 CFR 152.3(m))."</i></p> <p>§ 205.601 <i>"Synthetic substances allowed for use in organic crop production</i> ... <i>(m) As synthetic inert ingredients as classified by the Environmental Protection Agency (EPA)....</i> <i>(1) EPA List 4 - Inerts of Minimal Concern"</i></p>
2	Interpretation	<p>The official NOP guideline regarding inert ingredients, as communicated during numerous certifier trainings, is as follows:</p> <ul style="list-style-type: none"> • Inert ingredients others than those from List 4 are considered "non allowed substances". NOP does not make a distinction between active and inert ingredients in this regard. • Land on which an non allowed inert ingredient has been applied, has to undergo a new three years conversion period. <p>During a training conducted on 7 Feb. 2011 in Portland, OR, certifiers were informed however that "If (an) operation used a material and full disclosure of ingredients is not obtained: in that situation, it is appropriate to tell them to stop using the material, and the use of the material does not affect their certification." (ACA Guidewire, Volume 7, Issue 2, March 2011, p. 4).</p>
3	Terms	<p>We use the terms "pesticides" and "plant protection products" as synonyms. In the present context, both refer only to products, for which the active ingredients are allowed according to NOP.</p>
4	Policy	
4.1	Information disclosure	<ul style="list-style-type: none"> • Operators requesting NOP certification are always informed at a very early stage about the importance of: <ul style="list-style-type: none"> ○ Providing full information about inert ingredients contained in pesticides used in organic farming. The producer of the plant protection product must provide such information. ○ Using only plant protection products, for which the inert ingredients are known and allowed, according to what is described under (1) and (2) above. • Operators are required to include all relevant details about pesticides in their organic management plan (OMP), before the first inspection takes place. Operators are obliged to inform CERES beforehand, before using a new product. Using crop protection products without having submitted them previously to the certifier for approval, is a non-compliance with NOP (even in case the product as such turns out to be compliant). • If the pesticide manufacturer does not want to disclose information about inert ingredients to the organic operator, then CERES can request this information directly from the manufacturer, signing a confidentiality agreement, if requested. • If a confirmation of compliance ("certificate") with NOP requirements has been issued by another NOP accredited certification body for the pesticide, or it is listed as compliant with NOP by OMRI (Organic Materials Review Institute), then CERES does not need detailed information about inerts. It must be assur-

		ed, however, that the confirmation refers exactly to the pesticide in discussion (some producers offer a wide range of similar products with similar commercial names!), and that the recipe has not been modified in the meanwhile.
4.2	Corrective actions, sanctions	<ul style="list-style-type: none"> • If a producer fails to mention a pesticide in the OMP or annual OMP update, but the pesticide, including its inerts, turns out to be compliant, this will be considered as a minor non-compliance. Repetition of the same minor non-compliance, however, will make it a severe non-compliance. In such cases, the crop may be de-certified. • If a producer uses a pesticide containing an inert ingredient for which full disclosure of information cannot be obtained, he will be asked to confirm in writing that the product will no longer be used. In this case, neither the crop will be de-certified, nor the land will lose its organic status. Repetition of the same non-compliance, however, will lead to de-certification of the crop, and the land will have to undergo a new conversion period. • If a farm has used (intentionally or non-intentionally) a crop protection product with non-allowed inert ingredients, then the crop will be de-certified and the land, on which the product has been applied, has to undergo a new three years conversion period.
5	Related documents	<p>Brief Info NOP (3.2.10) Brief Info Piperonyl Butoxide (3.2.17) Sanction catalogue for organic production (4.9.2)</p>