Synthetic Amorphous Silica
and Silicate Industry Association

December 19, 2022

Jared Clark, Standards Division, National Organic Program, USDA-AMS-NOP,
1400 Independence Ave. SW, Room 2642-S., Ag Stop 0268,
Washington, DC 20250-0268.

RE: Docket AMS-NOP-21-0008
Regulatory Information Number (RIN) 0581-AE02

Inert Ingredients in Pesticides for Organic Production

The Synthetic Amorphous Silica and Silicates Industry Association (SASSI) supports the United States Department of Agriculture (USDA) effort to update the Organic Product regulations that are associated with the use of the Environmental Protection Agency's (EPA) inert ingredient lists which are no longer maintained or updated by the agency.

SASSI is interested in preserving the inert ingredient status of several forms of amorphous silica and silicates which are currently included on the EPA Lists 3 and 4.

In reviewing the options presented in the Federal Register announcement, it is felt by SASSI that Option B presents the best choice, both in maintaining consistency with other EPA approved pesticide inert ingredient uses and in eliminating the need for the USDA's National Organic Safety Board (NOSB) and Agricultural Marketing Service (AMS) to duplicate work on the validation of inert ingredients already done by the EPA under Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

Option B for would allow the use of inerts that are exempt from the requirements for a tolerance as referenced in 40CFR Part 180, and these inerts can be searched using the existing EPA on-line FIFRA Inert Finder tool. This has the advantage of having a search tool already available to formulators, and from our perspective addresses concerns over the most common forms of amorphous silica, both treated and untreated, and silicates (from List 3 and 4) which would be covered through their Part 180 listings.

This has advantages over Option A using the Minimum Risk Pesticides list which could eliminate products which are currently allowable causing unnecessary supply chain disruptions, Option C is limited to pheromone dispensers and traps so it is not an appropriate remedy, Option D requires the submission of individual ingredients for validation and listing through rulemaking that would require additional resources while also increasing the complexity of the process, or Option E which would only serve to delay a final resolution of the issue until a later date.

Therefore, SASSI supports the adoption of Option B.

Sincerely,

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