



April 28, 2025

Via Federal eRulemaking Portal: <http://www.regulations.gov>

National Organic Standards Board (NOSB)  
National Organic Program (NOP)  
Agricultural Marketing Service (AMS)  
US Department of Agriculture  
1400 Independence Avenue SW  
Room 2642-S, Mail Stop 0268  
Washington DC 20250-0268

**ATTN: Michelle Arsenault, Advisory Committee Specialist, NOSB**

**SUBJECT: Meeting of the National Organic Standards Board  
Federal Register Notice 90 FR 14064, March 28, 2025  
Sunset Review for 2027  
Docket ID AMS–NOP–24–0081  
Submission of Comments**

Dear Ms. Arsenault and NOSB Members:

Thank you for the opportunity to comment in advance of the 2025 Spring **Meeting of the National Organic Standards Board** regarding USDA-AMS-NOP-NOSB's Sunset Review of EPA List 4 under **7 CFR §205.601** for crop substances and **7 CFR §205.603** for livestock substances. The Biological Products Industry Alliance (BPIA) submits herewith these comments.

By way of introduction, BPIA promotes the responsible development of safe and effective biological products, including biopesticides, biofertilizers, and biostimulants. These beneficial tools are used in a variety of settings, including commercial agriculture, forestry, golf courses, home gardens, horticulture, and ornamentals. BPIA also supports public health through education, outreach, and advocacy activities at the state, federal, and international levels. BPIA's membership includes both large and small manufacturers of biological pest control products and biostimulants used extensively by conventional and organic growers in the USA and globally, as well as manufacturers of pesticide inert ingredients.

#### COMMENTS ON THE SUNSET REVIEW FOR LIST 4 FOR CROP AND LIVESTOCK USES

BPIA appreciates the opportunity to comment on inert ingredients for organic crop and livestock production on the **NATIONAL LIST OF ALLOWED AND PROHIBITED SUBSTANCES ("NATIONAL LIST")** under **7 CFR Part 205, Subpart G**. BPIA is pleased that the NOSB approved a proposal to revise the listing of inert ingredients at its Fall 2024 meeting. BPIA understands that NOP staff are currently drafting a proposed rule incorporating the NOSB's suggestions but that this rulemaking will not be finalized before "sunset review" decisions are necessary for the existing references in **7 CFR §205.601** for crop substances and **7 CFR §205.603** for livestock substances. For this reason, BPIA supports relisting EPA List 4 for both crop and livestock substances to bridge the gap until such new regulations for inert ingredients are put into place by rulemaking.

#### CONCLUSIONS AND NEXT STEPS

BPIA strongly supports the modernization of inert ingredient listing on the **NATIONAL LIST** and looks forward to the day when the "sunset review" of List 4 is no longer necessary. But until the rulemaking is in place, BPIA urges NOP to continue the allowance for inert ingredients under the current "List 4" listing to be retained.

Ms. Michelle Arsenault, USDA-AMS-NOP-NOSB

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Thank you again for the opportunity to comment. Should you have any questions about this response, please feel free to contact me.

Sincerely,

**BIOLOGICAL PRODUCTS INDUSTRY ALLIANCE**

A handwritten signature in black ink that reads "Keith J. Jones". The signature is written in a cursive, flowing style.

Keith J. Jones  
Executive Director