



October 1, 2026

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 2646-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 91 FR 52662, 14 August 2026
Docket ID AMS–NOP–26-0892
Submission of Comments

Dear Ms. Arsenault and NOSB Members:

Thank you for the opportunity to comment in advance of the 2026 Fall **Meeting of the National Organic Standards Board** concerning USDA-AMS-NOP-NOSB's agenda for discussion. The Biological Products Industry Alliance (BPIA) submits herewith these comments.

Representing more than 175 member companies, BPIA champions safe, effective, and environmentally responsible biological solutions—including biopesticides, biostimulants, and biofertilizers—used by both conventional and organic growers in the US and globally. Our diverse membership includes manufacturers, distributors, suppliers, consultants, research organizations, and regulatory experts committed to advancing sustainable agriculture. BPIA members rely on USDA for regulatory clarity, research support, and collaboration to bring innovative tools to growers. 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 products used extensively by conventional and organic growers in the USA and globally, as well as manufacturers of adjuvants and inert ingredients.

EXECUTIVE SUMMARY

BPIA appreciates the opportunity to respond and comment on NOSB's proposed recommendations.

CROPS

PROPOSALS

CHITOSAN

BPIA supports the approval of the petition for synthetically-produced chitosan as a pesticide or as a plant or soil amendment for use in organic crop production without restriction.

2028 CROPS SUNSET REVIEWS

EPA LIST 3 INERTS

BPIA supports the continued listing of EPA List 3 inert under **7 CFR §205.601(m)(2)** for use in products intended for use in organic crop production. The Crops Subcommittee also is recommending continuing the listing stating, "As

the organic industry awaits rulemaking action on inert ingredients used in organic pesticide products, the existing allowances will be maintained to ensure there are no disruptions to the availability of passive pheromone products for organic farmers.” The Subcommittee vote was unanimous not to remove EPA List 3 Inerts from the National List.

OTHER CHEMICALS SUBJECT TO SUNSET

BPIA supports the continued allowance of the following synthetic substances under [7 CFR §205.601](#):

- Calcium hypochlorite
- Chlorine dioxide
- Hypochlorous acid – generated from electrolyzed water
- Sodium hypochlorite
- Copper sulfate
- Ozone gas
- Peracetic acid
- Magnesium oxide

BPIA supports the continued prohibition of the following natural substances under [7 CFR §205.602](#):

- Calcium chloride
- Rotenone

BPIA appreciates the opportunity to comment and offer support to NOSB and AMS. Should you have any questions about these comments, please feel free to contact me.

Sincerely,

BIOLOGICAL PRODUCTS INDUSTRY ALLIANCE



Keith J. Jones
Executive Director