

# Inerts Working Group Update

CPDA Adjuvants and Inerts Conference

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# ISC is now IWG: A little bit of History

- Inerts Risk Assessment Steering Committee (IRASC):
  - Formed June 12, 2002 CPDA/CLA - Joint Conference on the EPA Inert Risk Assessment Guidelines (**FQPA**)
  - Envisioned to be a short term committee to prepare for Inert Reassessment
    - Dietary Exposure component of the EPA Risk Assessment Guidelines
    - Risk Assessment Tier Information for Inerts
    - Coordination and Communication on Data Protection, and Endocrine Issues
- Became the Inert Steering Committee (ISC) for on-going activities regarding Inert Ingredients
  - Formed the Inert Task Force which developed data used for EPA's Inert Reassessment – required by **the Food Quality Protection Act, 1996 (FQPA)**
- Eventually CPDA decided that the major work on inerts had been completed and ended the relationship with CLA

# Inerts Working Group

- CLA invited CPDA to participate and then join the IWG in the later part of 2018
  - Advantages
    - CPDA/CLA will speak with one voice on issues of agreement
    - Can debate issues where there is not agreement
    - Utilize competencies within both organizations but more importantly within the membership of both organizations
      - **Best knowledge of inerts resides within chemical companies manufacturing inerts**
      - **Best knowledge of the regulatory issues in using inerts resides within the user companies**
- Co-Chairs:
  - Kevin Crosby, Adjuvants Unlimited: Technical Co-Chair
  - Carmine Sesa, Co-Chair

# IWG Members: 28 members (19 CPDA Companies) including co-chairs

- Mickey Brigance (Adjuvants Unlimited)
- John Sellers (Akzo Nobel)
- Arthur Bass (Chemorse)
- Greg Grant (Croda)
- Alec Simpson (Croda)
- Brad Swillen (Ethox)
- Andrea Alquicira (Evonik)
- Marc McPherson (Evonik)
- Bob Young (Exacto, Inc.)
- Danielle Place (Exacto, Inc)
- Tim Dlabaj (Helena Agri-Enterprises, LLC)
- Jennifer Bear (Helena Agri-Enterprises)
- Dave Ferguson (Huntsman Performance Products)
- Curt Elsik (Huntsman Performance Products)

# IWG Members - Continued

- Mike Edens (KALO, Inc.)
- Lear Haulsee (Lamberti)
- Donna Hillebold (Nouryon)
- David Wyche (Oleon Americas)
- Brenda DeShields (Oxitenol)
- Jim Reiss (Precision Laboratories)
- Rebecca Peters (Precision Laboratories)
- Bruce Lyall (Rosen's)
- Paul Bially (Solvay USA)
- Ian Bartlett (Solvay USA)
- Jeremy D. Malone (Spring Trading Company)
- Dave Allen (Stepan Company)

# Today's Inert Issues

- BIT Sourcing Constraints
  - Following Presentation by Dr. Kevin Crosby, Adjuvants Unlimited, LLC
- Efficiency Improvement Proposals
  - Self-certification of Trade Name Mixtures – CLA Law Committee report
    - Douglas Hines, Bayer CropScience LP
  - Self-certification of Low Risk Polymers – CLA Law Committee report
    - Paul Kierkus; BASF Corporation
- Commodity Inerts
- Inert Disclosure (State Related)
- Microplastics issue in EU
- CAS# for Inert Finder issue
  - Donna Hillebold, Nouryon
- China tariffs
- State Regulatory Issues regarding adjuvants

# CAS # issue regarding Inert Finder

- Sept 28, 2012: CLA submitted to EPA a request to add 210 CAS #s to seven specific inert descriptors listed in 40CFR 180.910, 180.920 and 180.930
- 139 were added to Inert Finder. 71 remain.
- IWG is trying to determine the rationale for not adding all.
- Debate about whether the chemical description is enough or is the CAS# required for EPA approval of a CSF. Need EPA's clarification.
- Also some discussion regarding re-submitting as a petition – with cost.

# Commodity Inerts / Self Certification

- ISC developed a proposal for self certification of inerts which both CLA and CPDA felt were commodity chemicals
- Self Certification here would mean there is no requirement to list the manufacturer on the CS
- EPA recently provided a list of 153 inerts that were requested, with an indication of the standing within EPA relative to allowance – or not
- This list is being circulated for comment by IWG



# Conclusions

- The ISC is back as the IWG
- There are many important issues being considered:
  - **THIS IS THE TIME TO HAVE INPUT on these issues**
  - **NEW IDEAS / ISSUES?**
- 19 CPDA company members are involved
- Additional members welcome