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October 3, 2018

Ms. Michelle Arsenault, Advisory Committee Specialist
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. S.W.
Room 2642-S, Mail Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-18-0029
Handling Subcommittee – Calcium Carbonate

Dear Ms. Arsenault,

Thank you for the opportunity to provide comments to the National Organic Standards Board (NOSB) Handling Subcommittee (HS) regarding the sunset review of calcium carbonate listed at 205.605(a).

Oregon Tilth certifies many handling operations that use calcium carbonate as an ingredient or processing aid in a variety of organic products. At least 18 of these operations use it for purposes other than calcium fortification. Alternative usage includes pH adjustment, stabilizers, fillers, and anticaking agents. The majority use the more purified form known as precipitated calcium carbonate (PCC). Although the chemical composition is the same as ground limestone, PCC contains fewer impurities and is more commonly used by food processors.

Despite the inclusion of PCC in the 1995 technical report and review of calcium carbonate, the 2018 technical report identifies PCC as synthetic. This classification raises concerns and requires additional clarification about the allowance of this form of calcium carbonate in organic production. Others argue that PCC is nonsynthetic because it is chemically the same as the source material (ground limestone), a conclusion supported by question two on the NOP's *Guidance Decision Tree for Classification of Materials as Synthetic or Nonsynthetic* (NOP 5033-1). Both forms are food grade and have separate Generally Recognized as Safe (GRAS) listings (184.1191, 184.1409). However, ground limestone is typically lower in calcium content, with a minimum of 94 percent. PCC tends to have a higher calcium content of 98 percent.

It is important for the Handling Subcommittee to be aware that PCC has been historically referenced and considered as part of the nonsynthetic Calcium Carbonate listing and only the recent 2018 Technical Report appears to challenge this. Certifiers have reviewed this material for various uses, and we have found that it is used much more commonly in the food manufacturing world as an ingredient than ground limestone due to the purity differences, consistent particle size, and other quality attributes. The manufacturing method of PCC forms no new substance(s). It is not chemically or structurally different than how it occurs in the source material and the chemical changes associated with the purification steps are commonly found in other nonsynthetic materials found on the National List.

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For comparison, here are examples of materials that undergo similar purification processes and are accepted as nonsynthetic:

- Citric acid
- Lactic acid

Oregon Tilth requests that the NOSB be explicit in addressing the allowance or prohibition of the different forms of calcium carbonate commonly used in the production of processed foods as identified in the 1995 technical report and review. Certified organic processors and handlers use it as an ingredient or processing aid in beer, yogurt, soymilk, toothpaste, grain puffs, and more. Many organic operations will be significantly impacted if PCC is deemed to be synthetic and prohibited for use.

Respectfully submitted,

Oregon Tilth

Oregon Tilth is a leading certifier, educator and advocate for organic agriculture and products since 1974. Our mission to make our food system and agriculture biologically sound and socially equitable requires us to find practical ways to tackle big challenges. We advance this mission to balance the needs of people and planet through focus on core areas of certification, conservation, policy and the marketplace.