

**FORMAL RECOMMENDATION BY THE
NATIONAL ORGANIC STANDARDS BOARD (NOSB)
TO THE NATIONAL ORGANIC PROGRAM (NOP)**

Date: March 18, 2005

Subject: Calcium Carbonate Q & As

Chair: Jim Riddle
(sign)

Recommendation

The NOSB hereby recommends to the NOP the following:

Rulemaking Action: _____
Guidance Statement: X
Other: _____

Statement of the Recommendation (including Recount of Vote):

Question # 1: Does the NOP regulation permit livestock producers to use calcium carbonate as a feed supplement for livestock intended to be sold, labeled, or represented as organically produced? Please provide your rationale.

NOSB Recommended Answer: Yes. Mined calcium carbonate is a nonsynthetic substance allowed for use as a feed supplement or feed additive.

Question # 2: Can a mineral product, such as calcium carbonate, carry the term organic on its label? Please provide your rationale.

NOSB Recommended Answer: No. Section 205.2 defines “organic” as “a labeling term that refers to an agricultural product produced in accordance with the Act and the regulations in this part.”

Calcium carbonate is not an agricultural product and therefore does not qualify to carry the term “organic” under the NOP regulation.

NOSB vote: 14 yes, 0 no, 0 abstain

Rationale Supporting Recommendation (including consistency with OFPA and NOP):

Rationale explained in text below.

Response by the NOP:

NOSB Livestock Committee
Recommended Answers to the Questions:
“Can Calcium Carbonate Be Fed to Organic Livestock and
Carry the Organic Label?”
Adopted by NOSB March 1, 2005

Introduction:

The National Organic Program has asked the National Organic Standards Board to submit information concerning the status of calcium carbonate when used in livestock feed.

Background:

The following scenario has been presented to the National Organic Program (NOP) for clarification:

A manufacturer of calcium carbonate has asked whether his product can be fed to organic livestock and carry the organic label (manufacturer does not want to use the USDA organic seal). The calcium carbonate is mined, screened, and sold as a feed supplement to livestock. The substance can be either mixed with the animal feed or consumed as a stand-alone supplement. No synthetic substances are used in the manufacturing process.

Question # 1:

1. Does the NOP regulation permit livestock producers to use calcium carbonate as a feed supplement for livestock intended to be sold, labeled, or represented as organically produced? Please provide your rationale.

NOSB recommended response:

Yes. Mined calcium carbonate is a nonsynthetic substance allowed for use as a feed supplement or feed additive.

Section 205.237 “Livestock feed” states:

“(a) The producer of an organic livestock operation must provide livestock with a total feed ration composed of agricultural products, including pasture and forage, that are organically produced and, if applicable, organically handled: Except, That, nonsynthetic substances and synthetic substances allowed under § 205.603 may be used as feed additives and supplements.”

Question # 2:

2. Can a mineral product, such as calcium carbonate, carry the term organic on its label? Please provide your rationale.

NOSB recommended response:

No. Section 205.2 defines “organic” as “a labeling term that refers to an agricultural product produced in accordance with the Act and the regulations in this part.”

Calcium carbonate is not an agricultural product and therefore does not qualify to carry the term “organic” under the NOP regulation.

Section 205.301(e) “Livestock feed” states:

“(1) A raw or processed livestock feed product sold, labeled, or represented as “100 percent organic” must contain (by weight or fluid volume, excluding water and salt) not less than 100 percent organically produced raw or processed agricultural product.

Section 205.301(e) further states:

“(2) A raw or processed livestock feed product sold, labeled, or represented as “organic” must be produced in conformance with § 205.237.”

Since mined calcium carbonate is allowed as a nonsynthetic feed supplement or feed additive under 205.237, a blended feed ration containing calcium carbonate, other approved ingredients, and 100% organic raw or processed agricultural products can be labeled “organic livestock feed.”

Committee vote: 5 yes, 0 no, 3 absent

NOSB vote: 14 yes, 0 no, 0 abstain