



Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.iclfood.com
Email: ICL.CustomerInquiry@icl-group.com

May 16, 2024

INFORMATION SUMMARY FOR PHOSPHATES ALLOWED IN ORGANIC FOOD APPLICATIONS (U.S.)

U.S. National Organic Program (NOP):

The NOP is a regulatory program housed within the USDA Agricultural Marketing Service. This program is responsible for developing national standards for organically-produced agricultural products. These standards assure consumers that products with the USDA organic seal meet consistent, uniform standards.

A link to the general website for this program is provided: [USDA National Organic Program](#)

The regulations for the National Organic Program, including the NOP National List, can be found in Title 7 of the Code of Federal Regulations, Part 205. The electronic link is: [Title 7 CFR Part 205](#)

The National List:

The “National List of Allowed and Prohibited Substances” was established by the NOP to list the ingredients or substances that can or cannot be used in various types of organic production. The National Organic Standards Board (NOSB) meets regularly to evaluate petitions for inclusion of new substances on this list, and can recommend any additions or deletions to this List to the USDA.

Section 205.600 of the National List provides evaluation criteria for allowed and prohibited substances, methods, and ingredients.

Section 205.605 of the List provides information regarding the use of phosphates in organic food production. This section is titled: “Nonagricultural (non-organic) substances allowed as ingredients in or on processed products labeled as ‘organic’ or ‘made with organic (specified ingredients or food groups(s)).”

(a) Non-synthetics allowed: (not applicable to phosphates)

(b) Synthetics allowed: Phosphates currently on the list include:

- Calcium phosphates (monobasic, dibasic, and tribasic) - *No other disclaimers are noted, so these three ingredients can be used in any food application*
- Phosphoric acid – cleaning of food –contact surfaces and equipment only
- Potassium phosphate – for use only in agricultural products labeled “made with organic (specified ingredients or food group(s)),” prohibited in agricultural products labeled “organic”.
This is interpreted by industry to include only ortho-potassium phosphates (MKP, DKP, TKP), based on the definition given in 21 CFR 182 for sodium phosphates (and the similarity of potassium phosphates to this group of phosphates).
- Sodium acid pyrophosphate (CAS # 7758-16-9) – for use only as a leavening agent
- Sodium phosphates – for use only in dairy foods
This entry includes only ortho-sodium phosphates (MSP, DSP, TSP), based on the definition in 21 CFR 182 for sodium phosphates.
- Nutrient vitamins and minerals, in accordance with 21 CFR 104.20, Nutritional Quality Guidelines For Foods - *This CFR citation includes calcium, magnesium, phosphorus, & potassium, at specified levels for fortification in appropriately labeled foods. The FDA regulations in this section must be followed specifically.*

Labeling Information:

- The National Organic Program has information about Organic Labeling and Marketing on its website (<https://www.ams.usda.gov/grades-standards/organic-labeling-standards>) and in 7 CFR 205.
- If other non-organic ingredients are present in a food with an “organic” or “made with organic” label, these ingredients must be approved on the National List for use in that food application.

The information stated herein is presented in good faith and is believed to be correct as of the date specified in this statement.



Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
www.iclfood.com
<https://www.icl-phos-spec.com/>

Email: ICL.CustomerInquiry@icl-group.com

September 10, 2021

LOT CODE NUMBERING STATEMENT – ICL NORTH AMERICA

For tracking and identification purposes, ICL Specialty Products Inc. uses the SAP system at its U.S. facilities to generate unique lot numbers for all materials for sale. (A separate lot code numbering system is currently used for our Halox® products and at our production locations in Germany and Austria. Please request separate statements with those explanations, if needed.) These lot numbers appear on the bags, on the Certificate of Analysis, on the pallet labels, and on the bill of lading.

For packages (such as bags, drums, and super sacks) the lot number has 9 digits. The first 3 digits represent the plant of manufacture, while a computer-based counter at each plant sequentially assigns a number to generate the last 6 digits.

For bulk material, the lot numbers have 10 digits. The first 4 digits refer to the plant of manufacture, while the last 6 digits are generated by a computer-based counter at each plant.

Below is a list of the plant codes for ICL-NA sites. Additional 4-digit codes are also assigned to third-party locations in North America that package products for our company.

Please note that these lot code numbers can be represented with or without a “-“after the initial facility code (for example: 221-123456 or 221123456). Both formats (with and without the hyphen) are acceptable and are interchangeable.

Plant of Manufacture	3-Digit Code	4-Digit Bulk Code
Carondelet, Missouri	221	2210
Lawrence, Kansas	223	2230

For products manufactured at facilities in Brazil, the lot code will have the following 9-digit format: AAYYMMDDX

AA = production area code

YY = year of manufacture

MM = month of manufacture

DD = day of manufacture

X = sequential production number



Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.iclfood.com
Email: ICL.CustomerInquiry@icl-group.com

November 16, 2021

ALLERGEN STATEMENT:
PHOSPHATES, PHOSPHORIC ACID, AND SULFATES

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures food grade phosphates, phosphoric acid, and sulfates, which are high purity inorganic products manufactured from refined mineral raw materials. Unless otherwise indicated on the product specification sheets, these products do not contain any of the following allergenic substances, as specified in the U.S. Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA):

- Milk (and Milk Products)
- Eggs
- Fish
- Crustacean Shellfish
- Tree Nuts
- Wheat (or other Cereal Grains)
- Peanuts
- Soybeans (and Soy Products)

In addition, our food grade products do not contain any of the following allergens of concern in certain other world regions or countries:

- Gluten
- Sesame seeds
- Mustard (or mustard seeds)
- Celery
- Sulfites
- Molluscan shellfish
- Lupin

The information stated herein is presented in good faith and is believed to be correct as of the date specified in this statement.



Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.iclfood.com
Email: ICL.CustomerInquiry@icl-group.com

July 30, 2021

PROPOSITION 65 STATEMENT – PHOSPHATES

California Proposition 65, the “Safe Drinking Water and Toxics Enforcement Act of 1986”, requires the Governor of this state to publish a list of chemicals that are known to that state to cause cancer, birth defects, or other reproductive harm. This list is periodically updated with additions and delisted substances as determined by that state agency.

While none of the phosphates (or their raw materials) produced by ICL Specialty Products Inc. (including ICL Food Specialties and ICL Advance Additives) appear on the current list as of this date, some of the phosphates may contain very low or trace levels of certain compounds (which are naturally occurring in phosphate ore) that do appear on the Proposition 65 list.

Listed below are the upper limits of the Food Chemicals Codex (FCC) specifications for arsenic and lead, which are on the Proposition 65 list. The specifications for these impurities are met by our FCC food grade phosphates according to the levels listed in their specific FCC monographs.

Arsenic	< 3 mg/kg
Lead	< 2 or 4 mg/kg

Any assessments to determine if the “safe harbor” provisions of Proposition 65 are met are the responsibility of the user.

The information stated herein is presented in good faith and is believed to be correct as of the date specified in this statement.



Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)

www.iclfood.com

Email: ICL.CustomerInquiry@icl-group.com

July 30, 2021

GLUTEN FREE STATEMENT
FOR PHOSPHATES, PHOSPHORIC ACID, AND SULFATES

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures high quality food grade phosphates, phosphoric acid, and sulfates. These are high purity inorganic products manufactured from refined mineral raw materials, which do not contain gluten. (Gluten is a protein material naturally found in wheat and certain other cereal grains.) Therefore, the absence of gluten and gluten by-products can be guaranteed in these products.

The information stated herein is presented in good faith and is believed to be correct as of the date specified in this statement.



Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.iclfood.com

Email: ICL.CustomerInquiry@icl-group.com

July 30, 2021

STERILIZATION – IRRADIATION STATEMENT

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures high quality food grade phosphates, phosphoric acid, and sulfates, which are high purity inorganic products manufactured from refined mineral raw materials.

No sterilization procedures have been performed on these products, including, but not limited to: irradiation, steaming, or chemical processing for the purpose of sterilization.

The information stated herein is presented in good faith and is believed to be correct as of the date specified in this statement.



Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)

www.iclfood.com

Email: ICL.CustomerInquiry@icl-group.com

April 10, 2024

VEGAN AND VEGETARIAN STATEMENT

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures high quality food grade phosphates, phosphoric acid, and sulfates, which are high purity inorganic products manufactured from refined mineral raw materials. These products do not contain any organic compounds. There are no animal products or animal derivatives contained in or used in the manufacturing of these food ingredients, so they should be acceptable for use in foods produced for vegan or vegetarian diets.

The information stated herein is presented in good faith and is believed to be correct as of the date specified in this statement.



Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.iclfood.com

Email: ICL.CustomerInquiry@icl-group.com

July 12, 2021

HEAVY METALS TESTING IN FCC GRADE PRODUCTS

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures and/or markets high quality phosphates, phosphoric acid, sulfates, and adipic acid products that meet appropriate food grade specifications and can be used as food ingredients.

The Food Chemicals Codex (FCC) is a compendium of monographs for food ingredients, which includes characteristics, specifications, and test methods to determine the suitability of products for use in foods. FCC specifications are accepted for use in the U.S. and many other countries as an indication of appropriate purity for use in human foods.

The FCC no longer utilizes the Heavy Metals test method. In the Fifth Edition of the FCC (effective on January 1, 2004), the Committee on Food Chemicals Codex instituted a policy to replace the former general Heavy Metals (as Lead) test in many monographs with individual heavy metals limits and tests as determined pertinent based on the source and composition of the individual food additives. This allows for more specific tests and lower specification limits to be placed on only the specific heavy metals which could potentially be present in that food additive. Therefore, the general Heavy Metals test is no longer part of the FCC requirements, and instead, more specific analyses are required to test for certain individual metal impurities, as specified in the current FCC monographs.

The information stated herein is presented in good faith and is believed to be correct as of the date specified in this statement.

Product: Dipotassium Phosphate, Anhydrous Powder (DKPA) **Code:** 118

Effective Date: 20-MAR-2018

<u>Ingredients</u>	<u>Range (%)</u>
Dipotassium Phosphate, Anhydrous	100
	100%

CONFIDENTIALITY: The information and recommendations set forth herein (“Information”) shall be considered the confidential information of ICL Specialty Products Inc. By receipt of the Information, customer agrees not to disclose the Information, in whole or in part, to any third party without the prior written consent of ICL Specialty Products Inc.; provided, however, the customer may disclose the Information to any of its affiliates, employees, directors, officers or advisors (“Representatives”) on a need-to-know basis. Customer is responsible for any breach of these confidentiality obligations by its Representatives.

FOR MORE COMPLETE INFORMATION ON PROPERTIES AND SAFE HANDLING OF THIS MATERIAL, SEE THE SELLER’S SAFETY DATA SHEET (SDS).

NOTICE: The Information is presented in good faith and believed to be correct as of the date hereof. HOWEVER, NO REPRESENTATIONS OR WARRANTIES, EITHER EXPRESS OR IMPLIED, FOR COMPLETENESS, ACCURACY, MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, NON-INFRINGEMENT OR OF ANY OTHER NATURE ARE MADE HEREUNDER WITH RESPECT TO THE INFORMATION OR THE PRODUCT TO WHICH THIS INFORMATION REFERS. Seller is not responsible for damages of any nature whatsoever resulting from the use of or reliance upon the Information or the product to which the Information refers. Nothing contained herein is to be construed as a recommendation to use any product, process, equipment or formulation in conflict with any patent. The Information set forth herein are based on samples tested and are not guaranteed for all samples or applications nor do they reflect product specifications for any particular product.

ICL FOOD SPECIALTIES (A DIVISION OF ICL SPECIALTY PRODUCTS INC.)

Corporate Offices:
622 Emerson Road, Suite 500
St. Louis, Missouri 63141
314-983-7500

© 2018 ICL Specialty Products Inc.

For order assistance, please call our Customer Service Department Toll Free: 1-855-ICL-SPEC (1-855-425-7732)



Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)

www.iclfood.com

Email: ICL.CustomerInquiry@icl-group.com

February 4, 2021

SHELF LIFE AND STORAGE CONDITIONS STATEMENT

ICL Specialty Products Inc. (North America), including the ICL Food Specialties and ICL Advanced Additives divisions, manufacture and/or market high quality phosphates, phosphoric acid, sulfates, adipic acid, sea salt, licorice root extract products, and specialty food ingredient blends for use in food, pharmaceutical, and/or industrial applications.

The recommended storage conditions are for materials to be kept at ambient temperatures, low to moderate humidity and in the original packaging. Materials stacked during long-term storage may develop some pressure compaction and require screening or milling before use. This is particularly true of powdered products. In addition, Licrezz™ products must be stored in sealed packaging that prevents exposure to light, and under cool and dry conditions.

ICL does not guarantee the performance of our products indefinitely since we have no control over how materials are stored. However, if the recommended storage conditions are maintained, performance should be assured for the shelf life listed in the attached table, and in the case of some products, for a much longer period of time.

ICL will not recertify expired products for shelf life extension.

The information stated herein is presented in good faith and is believed to be correct as of the date specified in this statement.

Shelf Life Table --- ICL Specialty Products Inc. / ICL Food Specialties

<u>12 Month Shelf Life</u>	<u>18 Month Shelf Life</u>
Diammonium Phosphate (DAP)	Benephos® Sodium Potassium Hexametaphosphate (SKMP)
Levn-Lite® Sodium Aluminum Phosphate Blend	Dipotassium Phosphate (DKP)
Levona® Calcium Acid Pyrophosphate (CAPP)	Nutrifos® – Sodium Tripolyphosphate (STPP): 088, 188, BC
Monoammonium Phosphate (MAP)	Nutrifos® Blends: B-90, B-75, L-50, 100, 300, 330, 350, 355, 424
Pan-O-Lite® (Blend of SALP & MCP)	Polyclear®
Py-Ran® Anhydrous Monocalcium Phosphate	Sodium Trimetaphosphate (STMP)
Sodium Acid Pyrophosphate (SAPP): RD-1, 26, 28, 37, 40, 43	Sodium Tripolyphosphate (STPP)
Stabil-9® (Blend of SALP & AMCP)	Tetrapotassium Pyrophosphate (TKPP) – US-produced
	Tripotassium Phosphate (TKP)
	XP-4® (Sodium Phosphate Feed Supplement)
<u>24 Month Shelf Life</u>	
H.T.® Monocalcium Phosphate (MCP)	
Adipic Acid	<u>36 Month Shelf Life</u>
Cal-Sistent® Tricalcium Phosphate (TCP)	
Dicalcium Phosphate (DCPa / DCPd)	Licrezz™: FC, B
Disodium Phosphate (DSPa / DSPd)	Phosphoric Acid: All grades except Semiconductor grade - PurEtch®
JOHA® A100 – Sodium Aluminum Phosphate, Basic	Polyphosphoric Acid: All grades
Leverage® Heat Activated Leavening Agent (DMP)	Potassium Tripolyphosphate (KTPP)
Mianjia™ Blends: 100, 310, 400	Salona™ Sea Salt
Monosodium Phosphate (MSP)	Tetrapotassium Pyrophosphate(TKPP): Germany-produced
PurEtch® Phosphoric Acid – Semiconductor Grade	Tricalcium Phosphate: only EU food grade
Snow Fresh® Produce Stabilizer	Mag-nificent® Dimagnesium Phosphate (DMP)
Sodium Acid Pyrophosphate (SAPP NL)	Monopotassium Phosphate (MKP)
Sodium Acid Pyrophosphate (SAPP): Technical grades	
Sodium Hexametaphosphate (SHMP): All grades	<u>ICL Food Specialties Blends:</u>
Tetrasodium Pyrophosphate (TSPP)	<i>The shelf life information for blends or products that are</i>
Tricalcium Phosphate (TCP)	<i>not specifically listed on this document is stated on</i>
Trisodium Phosphate (TSPa / TSPc)	<i>each of the individual product specification sheets.</i>



Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)

www.iclfood.com

Email: ICL.CustomerInquiry@icl-group.com

March 11, 2021

MICROBIOLOGICAL TESTING STATEMENT

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures high quality phosphates, phosphoric acid, and sulfates, which are high purity inorganic products manufactured from refined mineral raw materials. The raw materials used for the production of these products should, by their nature, neither carry nor support the growth of microbiological contaminants. The chemical reactions and processing conditions involved in converting these raw materials to end products are such that they also preclude the transport or support of microbiological organisms.

Some microbiological species are airborne and could enter the container during packing, transport, storage, or use handling. Some of these factors are out of our control, so we cannot guarantee a totally microbial-free product. The chemical composition of the products and the environmental conditions should not, however, support the propagation of microbiological organisms. Initial challenge tests conducted internally involving selected phosphate products have confirmed that intentionally-added microorganisms will not survive in these stored products.

While the microbiological risk in these inorganic products is viewed as negligible, we have taken additional steps to implement a basic microbiological testing program at each of our manufacturing sites, which include Salmonella and Listeria. Due to inherent differences at our sites based on products manufactured, raw materials required, and processes utilized, these testing programs are not necessarily uniform among these sites. In our various site programs, representative samples of finished food grade products are routinely sent to an independent laboratory for microbiological testing. Sampled lots are placed on hold and not released unless a negative result is confirmed from the testing laboratory. In addition, some of our manufacturing sites also routinely conduct microbiological environmental swabbing tests on involved areas and zones. These microbiological testing programs are one component of ICL's commitment to food safety.

The information stated herein is presented in good faith and is believed to be correct as of the date specified in this statement.



Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)

www.iclfood.com

Email: ICL.CustomerInquiry@icl-group.com

March 31, 2021

PESTICIDE - FREE STATEMENT

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures high purity food grade phosphates, phosphate blends, phosphoric acid, sulfates, and sea salt products, as well as other specialty products and blends of food ingredients intended for use in food formulations.

Strict pest control policies are maintained at our food ingredient manufacturing facilities, which are certified under Global Food Safety Initiative (GFSI) programs. Pest control is contracted to licensed pest management companies. Only specially trained and licensed applicators treat our facilities as needed, using pesticides that have been approved for use in food facilities. Interior facility treatments consist of direct and contained application of pesticides to structural surfaces. In addition, pesticides are not stored on site at the manufacturing or warehousing areas.

Therefore, we can guarantee that the raw materials used to manufacture our food grade products, the packaging materials used for product storage, and our final food grade phosphate salts, phosphoric acid, sulfate salts, sea salt products and other specialty products and blends of food ingredients are free from contamination with pesticides and/or pesticide residue.

The information stated herein is presented in good faith and is believed to be correct as of the date specified in this statement.



Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)

www.iclfood.com

Email: ICL.CustomerInquiry@icl-group.com

March 31, 2021

GE / GMO (Genetically Engineered or Modified Organism) Statement

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures high quality food grade phosphates, phosphoric acid, and sulfates, which are high purity inorganic products manufactured from refined mineral raw materials. These inorganic products do not contain any components from plants, animals, or microorganisms, nor are they derived from or manufactured with materials or ingredients that are genetically engineered (GE) or genetically modified (GM). These ICL phosphate salts, phosphoric acid, and sulfate products also conform to the current EU regulations on genetically modified food and feed (EU 1829/2003 and EU 1830/2003).

In addition to not containing any genetic material these products are not listed on The Agricultural Marketing Service (AMS) list of bioengineered crops or foods nor do they contain such materials; therefore, no bioengineering disclosure is required.

The information stated herein is presented in good faith and is believed to be correct as of the date specified in this statement.

READY-TO-EAT FOOD (RTE FOOD) STATEMENT

UNITED STATES 21 CFR 117.3

Tilley Distribution certifies to the best of our knowledge that the following product is safe for human consumption at appropriate intended use levels in ready-to-eat (RTE food) applications without further processing required.

Ready-to-eat food (RTE food) is defined as *“any food that is normally eaten in its raw state or any other food, including a processed food, for which it is reasonably foreseeable that the food will be eaten without further processing that would significantly minimize biological hazards”*.

DPP051 DIPOTASSIUM PHOSPHATE, POWDER

TILLEY
DISTRIBUTION

Issue Date: July 15, 2024
Page: 1 of 1

Revision Date: July 1, 2024
Revision #: 0



ICL SPECIALTY PRODUCTS INC
 CUSTOMER SERVICE CENTER
 622 EMERSON RD., SUITE 500
 CREVE COEUR, MO, 63141-6742

Certificate of Analysis

Shipped to:	Seller Order # :
	Customer Sales Order #
	Container ID :
Ship Date: Oct-29-21	Certificate Date: Oct-29-21

Our Product: Dipotassium Phosphate Anhydrous (DKPA), Code 118, Food Grade, 50 LB Bag
 g, Food Ingredient

Customer Product: DPP051
 NSF® 60 - Certified to NSF/ANSI/CAN Standard 60 by NSF International Max use 18 mg/l
 FCC Grade - Complies with the current specifications of the Food Chemical Codex
 OU This product is certified Kosher (see certificate for specific details)

PROPERTY INSPECTION METHOD	SPECIFICATION	LOT/MFG.DT/BEST BEFORE DT 221087521 Aug-10-21 Feb-09-23
Appearance	Pass	Pass
Arsenic, ppm, Guaranteed	< = 3 PPM	< = 3 PPM
Assay, %	98.00 - 100.50 %	100.22
Fluoride,ppm, Guaranteed	< = 10 PPM	< = 10 PPM
Insolubles, % Guaranteed	< = 0.2 %	< = 0.2 %
Lead, ppm, Guaranteed	< = 2 PPM	< = 2 PPM
Loss on Drying, %	2.00 % Max	0.10
pH, 1% Solution	9.00 - 9.50 PH	9.16
Pyrophosphate, %, (Wet)	2.0 % Max	0.1

Guaranteed analysis checked at intervals according to plant schedule.
 Note: Equivalent Units of Measure: mg/kg = ppm; µg/kg = ppb
FOR CUSTOMER SERVICE PLEASE CALL: (800) 244-6169
 Authorized By: Tim Timmerman - Quality and Food Safety Manager
 CARONDELET PLANT, 8201 IDAHO AVE., SAINT LOUIS, MO, 63111