



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate B – Sustainability  
The Director

Brussels  
PP/sf/agri.b.4(2022)4654257

Dear [REDACTED]

I would like to thank you for your email<sup>1</sup> of 2 May 2022, in which you request clarification regarding the potential authorisation to use shilajit powder as a non-organic agricultural ingredient under Article 25 of Regulation (EU) 2018/848<sup>2</sup>.

I would like to recall what shilajit actually is, namely a natural exudation of variable consistency from layers of rocks mainly found in the Himalayas and consisting of a complex mixture of organic humic substances and plant and microbial metabolites, traditionally used in Ayurvedic medicine<sup>3</sup>.

Based on the information that you provided, shilajit powder cannot be considered as an agricultural ingredient as it is not covered by any category of agricultural products listed in Annex I to the Treaty on the Functioning of the European Union. Therefore, it cannot be the subject of an authorisation under Article 25 of Regulation (EU) 2018/848, which concerns the authorisation of non-organic agricultural ingredients for processed organic food.

This opinion is provided on the basis of the facts set out in your e-mail of 2 May 2022 and expresses the opinion of the Commission services and does not commit the European Commission. In the event of a dispute involving Union law it is, under the Treaty on the Functioning of the European Union, ultimately for the Court of Justice of the European Union to provide a definitive interpretation of the applicable Union law.

Yours sincerely,

[REDACTED]

<sup>1</sup> ARES (2022)3432388

<sup>2</sup> [Regulation \(EU\) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation \(EC\) No 834/2007 \(OJ L 150, 14.6.2018, p. 1\).](#)

<sup>3</sup> S. P. Agarwal, R. Khanna, R. Karmarkar, M. K. Anwer, and R. K. Khar, “Shilajit: a review,” *Phytotherapy Research*, vol. 21, no. 5, pp. 401–405, 2007.

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