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# NATURAL FLAVOR DECLARATION

**BACKGROUND INFORMATION:** The USDA National Organic Program (NOP) allows the use of certain natural (non-synthetic) flavors in products labeled as “Organic” and “Made with Organic (specified ingredients or food groups).” Natural Flavors are defined with the following language from FDA 21 CFR Part 101.22(a)(3): “The term natural flavor or natural flavoring means the essential oil, oleoresin, essence or extractive, protein hydrolysate, distillate, or any product of roasting, heating or enzymolysis, which contains the flavoring constituents derived from a spice, fruit or fruit juice, vegetable or vegetable juice, edible yeast, herb, bark, bud, root, leaf or similar plant material, meat, seafood, poultry, eggs, dairy products, or fermentation products thereof, whose significant function in food is flavoring rather than nutritional. Natural flavors include the natural essence or extractives obtained from plants listed in §§ 182.10, 182.20, 182.40, and 182.50 and part 184 of this chapter, and the substances listed in §172.510 of this chapter.”

The Canadian Food Inspection Agency (CFIA) Definition of Natural Flavours and Flavour Descriptors CFIA Guide to Food Labelling and Advertising, Chapter 4: “...Flavour descriptors: Substances which impart flavours which have been derived from a plant or animal source, may be claimed to be "natural". As well, any additive, such as preservatives and solvents added to a flavour preparation to have a technological effect solely on the flavour, does not modify the "natural" status of the flavouring material itself.”

In addition, for use in certified organic products, natural flavors must meet the natural flavor annotation on the National List of Allowed and Prohibited Substances (7 CFR 205.605) and the NOP requirements for Genetically Modified Organisms (GMO’s) and irradiation. **Non-synthetics allowed per §205.605(a) include, “Flavors – non-synthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative.” NOP §§205.105 (e)(f)(g) prohibit excluded methods, ionizing radiation or sewage sludge, as defined in §205.2.** More specifics on these requirements are described below.

**CURRENT STATUS:** NOP criteria for approval for use of natural flavors remain in discussion. Currently, **MOSA requires that the manufacturer of the flavor provides the following information for each natural flavor used in “Organic” or “Made with Organic...” products.** In addition to this form, MOSA may require more complete descriptions of source materials, solvents, carriers and preservatives used.

**Specific Identification of Product (Name/Code):** \_\_\_\_\_

**Supplied to MOSA Client:** \_\_\_\_\_  
(MOSA client name)

**Type of flavor (select one or more as necessary):**

- Compounded flavor     Distillate     Extract     Essential oil     Essential oil isolate
- Isolate     Oleoresin     Protein Hydrolysate     Compounded with other natural flavor
- Other (specify): \_\_\_\_\_

**A. Flavor Constituents NOTE: Flavors are products that are added to food to impart, modify, or enhance the flavor of food. Flavors do not include: 1) flavor enhancers; and 2) substances that have an exclusively sweet, sour, or salty taste (e.g. sugar, nutritive sweeteners, vinegar, and table salt).**

1. According to definitions in NOP §205.2: A **Nonsynthetic** (natural) substance is derived from mineral, plant, or animal matter and does not undergo a synthetic process as defined in §6502 (21) of the Act (7 U.S.C. 6502(21)). A

**synthetic** substance is formulated or manufactured by a chemical process or by a process that chemically changes a substance extracted from naturally occurring plant, animal or mineral sources, except that such term shall not apply to substances created by naturally occurring biological processes.

*Do all of the flavor constituents in the product come from nonsynthetic sources AND meet the FDA definition of a natural flavor [see above, FDA 21 CFR Part 101.22(a)(3)], or, if in Canada, the CFIA definition of a natural flavor?*

YES  NO

2. Natural flavors authorized for use in NOP “organic” or “made with organic...” products must NOT be produced using synthetic extraction solvents. **Extraction may only use natural, non-petroleum based solvents.** Allowed solvents include water, natural ethanol, super-critical carbon dioxide, authentic essential oil, and vegetable oils. No hydrocarbon solvents, or chlorinated, or halogenated solvents may be used. Propane, hexane, and freon are examples of solvents that may NOT be used.

*Is/are the natural flavor constituent(s) made using NOP-suitable extraction solvents?*  YES  NO

*If the solvent(s) used to extract the natural flavors is NOT water, natural ethanol, super-critical carbon dioxide, authentic essential oil, and natural vegetable oils, please disclose what it is:* \_\_\_\_\_

## **B. Other Ingredients**

1. Natural flavors authorized for use in NOP “organic” or “made with organic...” products must not contain any prohibited **synthetic carrier systems** or any **artificial preservatives**. This extends to synthetic processing aids, emulsifiers or antioxidants. Prohibited substances include but are not limited to propylene glycol, polyglycerol esters of fatty acids, mono- and di-glycerides, benzoic acid, and polysorbate 80. Carriers otherwise on the National List at section 205.605 may be used.

*List any carrier system(s) used in this natural flavor product, or attach an ingredient statement:*

\_\_\_\_\_

*List any preservative(s), other additives or foodstuff ingredients used in this natural flavor product or attach an ingredient statement:* \_\_\_\_\_

2. *Are these NON-flavor constituents/other ingredients certified “organic” and/or are they authorized synthetic or non-synthetic materials under the NOP National List (205.605)?*  YES  NO  Not applicable

**C. Genetically Modified Organism (GMO)** products may not be used at any stage in the process of making natural flavor products used in certified organic products. NOP §205.2 defines *excluded methods* as “a variety of methods used to genetically modify organisms or influence their growth and development by means that are not possible under natural conditions or processes and are not considered compatible with organic production. Such methods include but are not limited to recombinant DNA technology (including gene deletion, gene doubling, introduction of a foreign gene, and changing the positions of genes when achieved by recombinant DNA technology)...” Therefore, GMO-plant extracts may not be used, nor may natural flavors be the product of GMO-yeast fermentation, for example.

*Was this natural flavor product, including any solvents, carriers, preservatives, or processing aids used or contained therein, produced or handled using excluded (GMO) methods?*  NO  YES

**D. Ionizing radiation** as described in FDA regulation 21 CFR 179.26 is prohibited for all uses involving food preservation, pest control and pathogen control in certified organic products. Other radiation uses, including food inspection, are permitted, provided such use meets applicable FDA regulation, which establish limitations applicable to all (organic and non-organic) food products.

*Is ionizing radiation as described in FDA regulation 21 CFR 179.26 used in the processing of this natural flavor product?*

NO  YES

**E. Sewage sludge** (as a crop fertilizer) is defined in NOP §205.2 as “solid, semisolid, or liquid residue generated during the treatment of domestic sewage in a treatment works. Sewage sludge includes but is not limited to: domestic septage; scum or solids removed in primary, secondary, or advanced wastewater treatment processes; and a material derived from sewage sludge...” It is not permitted in the manufacture of any ingredients used in NOP products.

Was sewage sludge used in the production of this natural flavor?  NO  YES

Pursuant to 7 CRF §205.605(a)(9) and §205.105(e)(f)(g), and/or CAN/CGSB 32.311-2006, 6.4 and CAN/CGSB 32.310-2006, 1.4.1(a)(h) (COR) I, on behalf of the manufacturer, hereby attest that the information provided in this form is accurate and truthful to the best of my knowledge.

Name (please print) \_\_\_\_\_ Position \_\_\_\_\_

Company name \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Phone \_\_\_\_\_ Email \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_