



NATURAL FLAVOR DECLARATION

BACKGROUND INFORMATION: The USDA National Organic Program (NOP) allows the use of certain natural (nonsynthetic) flavors in products labeled as “Organic” and “Made with Organic (specified ingredients or food groups).” For use in products labeled as “Organic” natural (nonsynthetic flavors) are allowed aonly when organic flavors are not commercially available. A documented Organic Flavor Search and a Commercial Availability Plan is required for all nonorganic natural flavors in use in “Organic” products.

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.”

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 the use of excluded methods. **Nonsynthetic flavors allowed at §205.605(a) include, “Flavors – nonsynthetic flavors may be used when organic flavors are not commercially available. Organic or nonsynthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative.” NOP §§205.105 (e) and (f) prohibits excluded methods and ionizing radiation, as defined in §205.2.** More specifics on these requirements are described below.

This form must be completed by the manufacturer of each natural flavor used by certified operations in products labeled as “organic” or “made with organic (specified food groups).” Additional information may be required if needed to verify compliance with applicable regulations and policies.

Specific Identification of Product (Name/Code):

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): _____

Natural Flavor Product

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).

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 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.

All of the flavor constituents in the natural flavor product named above must comply with the following criteria:

- Does the material meet the FDA definition of a natural flavor [see above, FDA 21 CFR Part 101.22(a)(3)]? YES NO (not allowed)

- List all sources of the flavor (e.g. [Specific] spice, plant part, essential oil, etc).

- Is the material only used for flavoring purposes (no nutritional use or other functions)?
 YES NO (not allowed)

- Does the flavoring substance(s) in the natural flavor impart an exclusively sweet, sour, or salty taste ("flavors with modifying properties") rather than a specific characteristic flavor? *For example, if the only flavoring substance in the material is Luo Han Guo (Monk Fruit) derived products, Thaumatin, Glycosylated Steviol Glycosides, or similar then the answer should be "Yes".*
 YES NO N/A
 - If YES, attach documentation detailing the maximum usage rate for the overall flavor material to qualify as a natural flavor: Attached

- Can the material legally be labeled as a "natural flavor" on the finished product labels? YES NO
(FDA labeling regulations, <https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?fr=101.22> sections 101.22(h)(1) states that a natural flavor must be identified in the ingredient statement as a natural flavor, and sections 101.22(i)(1)(i) includes that on the principal display panel the name of the flavor may be immediately preceded by the word "natural" and shall be immediately followed by the word "flavored".)
 - If the flavor consists of a natural flavoring that must be declared by its common or usual name on the label, list the name here: _____ N/A

B. Non-flavor constituents and other ingredients

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, natural glycerin and vegetable oils. No hydrocarbon solvents, or chlorinated, or halogenated solvents may be used. Propane, hexane, triglycerides, and freon are examples of solvents that are prohibited.

- Is/are the natural flavor constituent(s) made using NOP allowed extraction solvents?
 YES **NO (not allowed)** **N/A, no extraction solvents used**
 - Please list any solvent(s) used in the production of this Natural Flavor Product:

 - If **alcohol/ethanol** is used, attach confirmation (MOSA Naturally Produced Verification form from the supplier/manufacturer that the alcohol/ethanol is produced naturally (via fermentation). **Attached** **N/A**
 - If **glycerin** is used as a solvent, attach confirmation (MOSA Naturally Produced Verification form) from the supplier/manufacturer that it was produced from agricultural source materials and processed using biological or mechanical/physical methods. **Attached** **N/A**

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**. Prohibited substances include but are not limited to propylene glycol, polyglycerol esters of fatty acids, mono-, di-, and tri-glycerides, benzoic acid, and polysorbate 80. Carriers and preservatives on the National List at section 205.605 and 205.606 may be used.

- Is/are the carrier systems used nonsynthetic?
 YES **NO (not allowed)** **N/A, no carrier system used**
 - Please list any carrier system(s) used in this natural flavor product:

 - If **maltodextrin** is used as a carrier, attach confirmation (MOSA Naturally Produced Verification form) from the supplier/manufacturer that enzymes are responsible for the hydrolysis.
 Attached **N/A**
 - If **glycerin** is used as a carrier, attach confirmation (MOSA Naturally Produced Verification form) from the supplier/manufacturer that it was produced from agricultural source materials and processed using biological or mechanical/physical methods. **Attached** **N/A**

- Is/are the preservative(s) used nonsynthetic?
 YES **NO (not allowed)** **N/A, no preservative(s) used**
 - Please list any preservative(s) used in this natural flavor product: _____
 - If citric acid is used as a preservative, is it produced via fermentation of carbohydrates?
 YES **NO (not allowed)** **N/A**

C. Excluded Methods (GMOs) 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 cell fusion, microencapsulation and macroencapsulation, and recombinant DNA technology (including gene deletion, gene doubling, introducing a foreign gene, and changing the positions of genes when achieved by recombinant DNA technology).” Other methods such as gene silencing, synthetic biology, cisgenesis, plastic transformation, intragenesis, agro-infiltration, transposons, and induced mutagenesis are also prohibited. Therefore, GMO-plant extracts may not be used, nor may natural flavors be the product of GMO-yeast fermentation, for example.

This natural flavor product, including any solvents, carriers, preservatives, or processing aids used or contained therein, was produced and handled without the use of excluded methods. YES NO (not allowed)

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 establishes limitations applicable to all (organic and nonorganic) food products.

This natural flavor product was produced and handled without the use of ionizing radiation as described in FDA regulation 21 CFR 179.26. YES NO (not allowed)

E. Nanotechnology, or technologies intentionally manipulating matter at atomic, molecular, or macromolecular dimensions typically between 1 and 100 nm to create materials, devices and systems with fundamentally new properties and functions, is prohibited for all uses and materials used in organic products. Naturally occurring nano-sized particles or those produced incidentally are permitted.

This natural flavor product was produced and handled without the use of nanotechnology as described in NOP Policy Memo 15-2. YES NO (not allowed)

To be signed by a qualified, technical representative of the manufacturer. Any operation that makes a false statement under The Organic Foods Production Act of 1990 to an accredited certifying agent shall be subject to the provisions of section 1001 of title 18, United States Code (205.100(c)(2)).

Pursuant to applicable regulations, 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 _____

Manufacturer name _____

Address _____

City _____ State _____ Zip _____

Phone _____ Email _____

Signature _____ Date _____