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Clarification on Flavors used in Organic Products

In late February the NOP published a guidance document regarding flavors and whether or not flavor ingredients need to be sourced organically. You may refer to this document on the NOP website at following link

http://www.ams.usda.gov/NOP/NOPGuidanceCertifiersFlavors02_20_07.pdf

In this guidance document the NOP clarifies that non-synthetic flavors may be used in organic products according to the National List, 205.605, and do not need to be sourced organically nor petitioned to be placed on 205.606. As long as flavors meet the definition of a natural flavor, according to the FDA in 21 CFR Part 101.22(a)(3), and they are from nonsynthetic sources and are not produced using synthetic solvents and carrier systems or any artificial preservatives, they may be used.¹ The FDA definition of natural flavor is as follows: “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.” FDA 21 CFR Part 101.22(a)(3)

Please note that ingredients that qualify as flavors are those that are composed of the flavoring constituents derived from a natural substance, not those ingredients obtained by cutting, grinding, drying, pulping, or similar processing of tissues derived from fruit, vegetable, meat, fish, or poultry. The latter ingredients would be considered “agricultural” and would need to be sourced organically or petitioned for inclusion on 205.606 after June 2007.

For those of you who are already using organic flavor ingredients or who are in the process of obtaining organic flavor ingredients (e.g., organic essential oils), you may want to continue to follow that path. The NOSB is currently in the process of evaluating the current NOP definitions of “agricultural” and “non-agricultural.” The outcome of that evaluation may impact the NOP’s guidance on flavors; additionally the NOSB may recommend changes to the National List with regard to flavors. Using certified organic flavor ingredients now is perhaps the safest approach, and will buffer your products against any changes regarding flavors in the future.

If you have any questions regarding flavors, please contact your Account Coordinator at QAI.

¹ This does not apply to essences or oils that are added-back to organic juices during processing. “Add-backs” in organic juices must be sourced organically.