



VOF Natural Flavor Documentation

Vermont Organic Farmers, LLC (VOF)

Northeast Organic Farming Association of Vermont (NOFA-VT)

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Natural flavors are allowed as non-organic ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))" provided they comply with provisions established in the USDA National Organic Program (7 CFR Part 205).

Section 205.605 (a)(9) states: Nonsynthetics allowed include, Flavors - nonsynthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative. Sections 205.105 (e)(f)(g) prohibit excluded methods, ionizing radiation or sewage sludge, as defined in 205.2.

Further clarification:

1. All of the flavor constituents in the product are from non-synthetic sources.
National Organic Program definitions, in 205.2: *Non-synthetic* (natural) is a substance that is derived from mineral, plant, or animal matter and does not undergo a synthetic process as defined in section 6502 (21) of the Act (7 U.S.C. 6502(21)). *Synthetic* is a substance that 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.
2. The FDA Definition of a Natural Flavor: 21 CFR 101.22
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 Secs. 182.10, 182.20, 182.40, and 182.50 and part 184 of this chapter, and the substances listed in Sec. 172.510 of this chapter.
3. Natural flavors must not be produced using synthetic solvents. Extraction may only use natural, non-petroleum based solvents. Allowed solvents include water, 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 may not be used.
4. Natural flavors must not contain any synthetic carrier systems or any artificial preservatives. This includes synthetic emulsifiers or antioxidants. Prohibited substances include but are not limited to propylene glycol, polyglycerol esters of fatty acids, mono- and di-glycerides, benzoic acid, polysorbate 80, etc.

5. Allowed mechanical or biological methods for processing/handling as defined in 205.2 include, but are not limited to, heating, drying, mixing, grinding, separating, extracting, fermenting, distilling, preserving, dehydrating, freezing, or otherwise manufacturing. Therefore, physical or mechanical processes such as fractional or steam distillations are allowed for extraction and separation.
6. Genetically Modified Organism (GMO) products may not be used at any stage in the process of making natural flavors. Excluded methods – 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; natural flavors may not be the product of GMO-yeast fermentation.
7. Ionizing radiation is prohibited for all uses involving food preservation, pest control and pathogen control. Other radiation uses, including food inspection, are permitted, provided such use meets applicable FDA regulations, which establish limitations applicable to all (organic and non-organic) food products.
8. Sewage sludge (as a crop fertilizer) is 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.

Specific Identification of Product(s):

Supplier Name and Address:

Pursuant to 7CRF §205.605(a)(9) and §205.105(e)(f)(g), I, on behalf of the supplier, hereby attest that product(s) identified on this form comply with the Organic Foods Production Act of 1990 and its implementing regulations. In addition, I attest that this product meets the definition of “natural flavor” as defined by the FDA and has been approved for human consumption.

Signature of Supplier Representative: _____ **Date** _____

Printed Name _____ **Title** _____