



NATURAL FLAVOR PRODUCT QUESTIONNAIRE - NATIONAL ORGANIC PROGRAM USE

The **USDA National Organic Program (NOP)** allows the use of certain natural (non-synthetic) substances, including flavors, in products labeled as "Organic" or "Made with Organic...(specified ingredients or food groups)" providing they comply with provisions established in the USDA NOP (*7 CFR Part 205*).

The NOP defines **Non-synthetic** (natural) in 7 CFR 205.2: 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)*). Under the terms of the Act, "**synthetic**" means 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.

Non-synthetic Flavors authorized under the NOP, Section 205.605 (a)(9) must be from non-synthetic sources only and must not be produced using synthetic solvents, carrier systems or any artificial preservative. In addition, **Sections 205.105 (e)(f)** respectively prohibit so-called "excluded" methods (GMOs) and ionizing radiation from being used to produce or during the handling of any ingredients or products under the NOP.

FDA Definition of Natural Flavors *FDA 21 CFR Part 101.22(a)(3)*: "...**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 [*but not exclusively*] the natural essences 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 order to approve the use of a natural flavor used in an "organic" or "made with" product, QAI requests the information below in order to determine compliance under the terms of the NOP. QAI may request additional information as needed.

Identification of Natural Flavor Product (Name/code): HELIOTROPINE NATURAL/500670

Supplier Name and Address: Vigon International, Inc. 127 Airport Road East Stroudsburg, PA 18301 USA

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

<input type="checkbox"/>	Protein Hydrolysate	<input type="checkbox"/>	Extracts	<input type="checkbox"/>	Essential oil
<input type="checkbox"/>	Compounded flavor	<input type="checkbox"/>	Oleoresin	<input type="checkbox"/>	Isolate
<input type="checkbox"/>	Distillate	<input type="checkbox"/>	Compounded WONF	<input checked="" type="checkbox"/>	Other

Natural Flavor Product

A. Flavor constituents

- Do all of the flavor constituents in the natural flavor product named above meet the FDA definition of a natural flavor (see above)?
 Yes No
- Natural flavors** authorized for use in NOP "organic" or "made with organic" products, in addition, must not be produced using **synthetic extraction solvents**. Extraction may only use natural, non-petroleum based solvents. Is/are the natural flavor constituent(s) made using NOP-suitable extraction solvents?*"

 Yes No N/A, no extraction solvents used

