

# ENGLISH VERSION

## **USE OF THE TERM « NATURAL » IN COMPLIANCE WITH THE REGULATION FLAVOURS 1334/2008**

The article 16 of the European regulation 1334/2008 regarding the food flavours define the use's conditions of the term natural.

According to the article 16.2, the term natural may be used/applied only if the flavouring part is exclusively composed of natural flavouring agents such as natural flavouring substances and/or flavouring preparations.

4 designations exist regarding the naming of the natural flavours sales defined according to the articles 16.3, 16.4, 16.5 and 16.6.

### **A) Natural flavouring substances (article 16.3)**

The designation « natural flavouring substances » may be applied only for the flavours for which the flavouring part is exclusively composed of natural flavouring substances.

If the articles 16.4, 16.5 or 16.6 are practical then the corresponding can be applied.

### **B) Natural flavour « X » (or natural flavour of « X ») (ANX) (article 16.4)**

The term natural may be used in association with a foodstuff reference or a category of commodity only if the flavouring part comes from at least 95% in weight of the source material named and if the flavor profile of the source is easily recognizable.

The recital 26 of the regulation is related to the others 5% of the flavouring part.

According to the recital 26, as the use of the flavours cannot mislead the final consumer as for the source used for the natural flavours production; the 5% coming from other sources must only adjust the natural variations of the flavouring profile in order to guarantee a constant quality and/or bring a specific note (fresh, green, spicy ... note).

The use of the 5% non-sources to produce the global flavouring profile of the flavour is forbidden so 5% of non-sources cannot produce the global 95% of the aromatic profile by other means the flavour would be not in accordance with the dispositions of the article 16.4.

The perfect knowledge/command of the conformity of a natural flavour of "X" (ANX) has to pass through the verification of the article 16.4 requirements (95% minimum) and the sensorial analysis evaluated by a panel of experts in charge of the verification of the sensorial impact of the source (at the recommended dosage) in the right final application.

The both parts (95% and 5%) are tasted by a panel of experts using the sensorial descriptors defined.

According to our procedure related to the evaluation of our raw materials and the sensory tests done internally it's very complicated (to not say impossible) to propose a large range of fruity notes (except citrus) as " natural of X " flavours at reasonable dosage and suitable for different final applications.

In practice, a pineapple concentrated juice has an average dosage of 5g/L in sweet water, a pineapple infusion has an average dosage of 4g/L in sweet water. Based on this parameters, a natural flavour of pineapple will have an average dosage of 15 to 20g/kg in stirred yogurt.

It's also possible to formulate « natural of X » flavours from FTNF, those extracts including volatiles compounds from the fruits, more concentrated than the classical extracts such as contracted juices, infusions, alcoholates... The constraints linked to the use of those FTNF are nevertheless their high prices and their minimum order quantities.

Some FTNF allow us to formulate « natural flavours of X » for beverages applications and stirred yogurt. For final applications like confectionary / bakery, the heat stability of those FTNF is not always checked and need to be tested on a case-by-case basis.

**C) Natural flavour « X » with other natural flavours (article 16.5)**

The term Natural Flavour "X" with other natural flavours may be used only if the flavouring part comes from, partly, of the named source AND if the aromatic profile of this source is always easily recognizable.

In case of doubts (if the source is not easily recognizable) we have to use the term "Natural flavour". As for the natural flavours « X », the perfect knowledge/command of the condition « easily recognizable » must be based on the sensorial evaluation of a panel of experts.

**D) Natural flavour (article 16.6)**

The term « natural flavour » may be used only if the flavouring part comes from the different source materials and if there is no clear relation between the source materials used and the global aromatic note of the flavour.

**E) NATURAL FLAVOURS AND NEW REGULATION 848/2018 RELATED TO THE ORGANIC FOODSTUFF**

The new regulation 848/2018 related to the organic foodstuff has been polished the 14 June 2018 and will take effect the 1<sup>st</sup> January 2021.

The regulation will plan to use the organic foodstuff, the flavours conventional to "organic compatible" or the organic certified flavours.

In all cases, only the Natural flavours of X will be able to be used in the organic foodstuff.

Those natural flavours of "X" allowed in the organic foodstuff must be in accordance with the disposition of the article 16.4 as explained above.