

## FAQ

# Top 10 Organic Questions Answered

Quality Assurance International (QAI) answers the top organic certification questions from flavorists

**T**here's no doubt that organic foods are becoming mainstream, with natural food stores such as Whole Foods Market leading the way for more mass-market chains (including Wal-Mart) to add organic products. According to the Organic Trade Association (OTA), the overall organic food market has grown 28% since 2003, reaching \$16 billion in 2006. With the increase in demand, food and beverage manufacturers are increasingly turning to the US Department of Agriculture (USDA) Organic seal as a mark of approval. In fact, according to the OTA's 2006 Manufacturer Survey, more than 50% of respondents reported that the USDA label increased their ability to generate sales of organic products. As the organic industry grows, regulations and labeling requirements also are changing. How can flavorists keep up? *P&F* magazine recently spoke with QAI technical specialist **Jessica Walden** to get the answers to top questions received from you—the flavorists. **At press time there was widespread confusion with regard to National Organic Program's (NOP) January 11th statement on this matter; a clarification is forthcoming.**

**P&F:** What flavor ingredients are considered “agricultural” vs. “nonagricultural” and how are they assessed for compliance under the NOP Rule?

**Walden:** QAI's current view is that any ingredient which is a product of basic processing, such as distillation and extraction of a plant (including vegetable and fruit juices) or animal (including eggs and dairy products), is considered “agricultural.” Examples include lime oil, cherry bark extract, vanilla extract, almond oil, etc. For flavors to claim a status of organic, all agricultural ingredients must be sourced organically, unless they are not commercially

available in organic form. Beginning June 9, 2007, all agricultural ingredients must be sourced organically or they must be listed in the NOP Regulation in section 205.606. [This is discussed in more detail later.]

We consider flavor chemicals that are usually further isolated or extracted from products such as essential oils to be “nonagricultural” and they do not need to be sourced organically. However, they must meet the US Food and Drug Administration (FDA) definition of natural flavor, must be non-synthetic and be produced without synthetic solvents, preservatives and carrier systems. They also must be produced without the use of genetically modified organisms or irradiation. Examples include citral, limonene, etc.

Please note, QAI's interpretation of agricultural vs. nonagricultural flavor ingredients may change

## An introduction to QAI

QAI offers independent third party organic certification to the USDA's National Organic Program (NOP). QAI works with all facets of the food industry, from the land on which the product is grown, the producers growing the product, and postharvest facilities preparing the product; to the processing and handling facilities transforming the product. QAI is not a consulting body, but it offers certification information and guidance to clients and potential clients. QAI is focused on the ongoing education of the organic community and consumers.

QAI currently certifies 17 companies that manufacture flavors, such as Citroil Enterprises, Danisco USA Inc., David Michael & Co., Frutarom USA Inc., Moore Ingredients Ltd., Sensient Flavors Inc., and Virginia Dare Extract Co. The certification process takes eight to 10 weeks from the time QAI receives and deems the application complete.

depending on further changes to the definitions in the NOP [as recommended by the National Organic Standards Board (NOSB)].

**P&F:** What are the organic requirements for flavor ingredients?

**Walden:** All ingredients in the flavor, including carriers or solvents, must either be organically produced, approved nonorganic agricultural materials, or approved nonagricultural ingredients, which are listed in the NOP Regulation, section 205.605. For products making a 100% organic claim, all ingredients in the product must be certified 100% organic and any processing aids used must be organic. For the organic claim, all organic ingredients must equal 95% of the product's formulation (excluding water and salt). The remaining 5% either must be ingredients listed in section 205.605 or, beginning June 2007, listed in section 205.606.

For products making a "made with organic (specified ingredients or food groups)" claim, at least 70% of the product (excluding water and salt) must be composed of organic ingredients. The remaining 30% may be from nonorganic agricultural ingredients or nonagricultural ingredients listed in section 205.605 of the NOP Regulation. All nonorganic ingredients in an organic or made-with-organic product must be produced without genetically modified organisms, irradiation or sewage sludge. All certified organic flavors and flavor ingredients must be non-synthetic and produced without synthetic solvents, carriers or preservatives.

**P&F:** Are there special labeling requirements for organic flavors?

**Walden:** Most flavors are sold in bulk to other food manufacturers. Organic flavors may be labeled in compliance with FDA labeling requirements. The only addition is that the organic flavor should be described as "organic" on the label and a lot number will need to be affixed. It should be noted that the word "organic" may not modify a nonorganic ingredient in the product. So, a strawberry flavor that does not contain any organic strawberries in the product may not be labeled "organic strawberry flavor." It may, however, be labeled "organic flavor strawberry type," or something similar. For flavors that only qualify for the "made with organic" claim, they cannot be labeled as organic but can be labeled as follows: "strawberry flavor, made with organic alcohol," "strawberry flavor, 70% organic" or something similar.

**P&F:** How should each type of flavor (100% organic, made with organic, etc.) be labeled on a finished consumer product's ingredient declaration?

**Walden:** In terms of how flavors can be displayed on the consumer finished product's ingredient panel, for

## Followup Questions?

The floor is now open. Get your organic/natural certification questions answered by QAI experts. Just e-mail your questions to [kfrederick@allured.com](mailto:kfrederick@allured.com) and stay tuned to the *P&Fnow* e-newsletter where your questions and others' will be answered. Sign up for the free *P&Fnow* e-newsletter by going to [www.PerfumerFlavorist.com](http://www.PerfumerFlavorist.com).

100% organic and organic claims, the flavor can be labeled as 100% organic flavor or organic flavor. The type of flavor can be displayed as well (e.g., "organic strawberry flavor" so long as the strawberry in the product is organic). For flavors that only qualify for the made with organic claim, they cannot be depicted on the ingredient panel as organic flavors but they can be labeled as follows: "natural flavor (made with 70% organic ingredients)," "natural flavor (made with organic coffee)" or something similar.

**P&F:** What verification documentation do I need to obtain from my suppliers to prove that the ingredients are organically certified?

**Walden:** For flavors that will be certified to the NOP you will need to obtain documentation from your supplier that verifies that the product you are purchasing is certified to the NOP. There are many organic standards that exist around the world (EEC 2092/91 in Europe, JAS in Japan, CAAQ in Quebec, etc.) that are not currently recognized by the US NOP. For any ingredients that you source from overseas, please be careful to ensure that the ingredients are certified to the NOP.

**P&F:** Please define "commercial availability" and describe how it affects the ingredients we use to create and manufacture certified organic flavors.

**Walden:** "Commercially available" is defined by the NOP as: "The ability to obtain a production input in an appropriate form, quality or quantity to fulfill an essential function in a system of organic production or handling, as determined by the certifying agent in the course of reviewing the organic plan." In other words, for any product making an organic claim, you must only source agricultural

ingredients that are organic, unless you can demonstrate to the certifier that you are unable to source an agricultural minor ingredient (less than 5% of the product) as organic.

**P&F:** How will the commercial availability changes that will be enforced on June 9, 2007, affect ingredients used in organic flavors?

**Walden:** Beginning June 9, 2007, all nonorganic agricultural ingredients in products labeled as organic must be listed on 205.606 *and* must be demonstrated as commercially unavailable. If these ingredients are not listed on 205.606 by June 9, 2007, the company will be required to either source the organic version *or* change the labels to a “made with organic” claim. As a certified flavor manufacturer, you are required to follow this commercial availability requirement for all agricultural ingredients. To have ingredients reviewed for inclusion on 205.606, you must petition the USDA NOP. For information on the NOP Petition process, please visit [www.ams.usda.gov/nop/newsroom/fedreg01\\_18\\_07nationallist.pdf](http://www.ams.usda.gov/nop/newsroom/fedreg01_18_07nationallist.pdf).

However, a consumer using flavors in organic products is not currently required to source organic flavors because flavors are listed in section 205.605 of the NOP Regulation as approved non-agricultural ingredients. Until flavors are removed from 205.605, nonagricultural flavors do not have to be sourced organically. This means that any flavor chemicals that you source to use in your organic flavors (e.g., citral,  $\delta$ -lactone, etc.) do not need to be organically produced.

**P&F:** If I produce a flavor key to be used in my organic flavor, must I disclose those individual ingredients to QAI? If yes, is this information kept confidential?

**Walden:** The answers are yes and yes. QAI needs to be able to assess the flavor key to determine compliance under the NOP. Please note that any nonagricultural ingredients added to a flavor must be covered under section 205.605 of the NOP Rule (referred to as the National List). So, any ingredients added for purposes other than flavoring (e.g., texture) would only be allowed if they are listed on 205.605.

**P&F:** Do I include the weight of solvents and carriers when calculating the organic ingredient percentages of my final flavor product?

**Walden:** Yes. We include all ingredients in the finished product when calculating the organic percentages (aside from water and salt).

**P&F:** For those of us already manufacturing and selling certified organic flavors, how will the upcoming changes (sunset, definitions of “agricultural” and “non-synthetic”) affect our current certified organic flavors and the ingredients we use to make them?

**Walden:** Sunset occurs once every five years and is when all materials on the National List of Allowed and Prohibited Substances are reviewed and either voted to stay on the list or to be removed. We have just completed our first sunset period and the only item removed from the National List (205.605) was colors. Flavors are still allowed, but will be reassessed in five years. Regarding the current NOP definitions of agricultural, nonagricultural, non-synthetic and synthetic, they are currently being considered and will possibly be amended by the NOSB. At this time, it is unclear how the definitions will change or if and how they will affect our certified clients. It is important to note that once the NOSB makes its recommendations, it will open for public comment. In any case, if the definition changes will affect certified operators, then there will be a phase-in time to allow for changes to products, if applicable.

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