| Natural Flavors Affidavit | | |
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| **Instructions**  **For QCS client:** This affidavit is needed to evaluate if a flavor used in an “organic” or “made with organic…” product meets the requirements under the terms of the USDA National Organic Program. **This affidavit must be completed and signed by a qualified representative of the flavor manufacturer. Once completed, submit this affidavit to QCS for review and consideration.** | | |
| **Background – Allowed use of Natural Flavors in “organic” and “made with organic…” products**  The USDA Organic Regulations allows the use of certain natural (non-synthetic) substances, including natural 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 **Nonsynthetic** (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.  **Nonsynthetic Flavors** authorized under the NOP, Section 205.605 (a) must be from non-synthetic sources only and must not be produced using synthetic solvents, carrier systems or any artificial preservative(s).  Nonsynthetic flavors may be used when organic flavors are not commercially available.  **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 addition, **Sections 205.105 (e)(f)(g)** respectively prohibit so-called “excluded” methods (GMOs), ionizing radiation or sewage sludge, defined in 205.2, from being applied to any ingredients or products under the NOP. | | |
| **Natural Flavor Product Name/Code:** | **Manufacturer:** | |
| **Generic Name:** | **Contact Info:** | |
| **Name of person completing this form:** | **Title of person completing this form:** | |
| 1. **Type of flavor (select one or more as necessary):**  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | |  | Compounded WONF |  | Essential oil |  | Oleo resin | |  | Distillate |  | Essential oil Isolate |  | Other (e.g., single flavor chemical): |  1. **Natural flavor:** 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 2. **Extraction solvents:** Natural flavors authorized for use in NOP “organic” or “made with organic” products, must not be produced using synthetic extraction solvents. Extraction may only use nonsynthetic, non-petroleum based solvents. Please answer the following:  |  |  | | --- | --- | | 1. Are solvents used in the production of this flavor and/or its constituents? If no, go to question 4. . | Yes  No | | 1. Are all solvents used in the production of this flavor and its constituent(s) nonsynthetic? | Yes  No | | 1. Are any of the following(allowed) natural solvents used in the production of this flavor:   Water, natural ethanol, super-critical carbon dioxide, authentic essential oil, and natural vegetable oils? | Yes  No | | 1. Are any other natural solvents used that are not listed above? If yes, please disclose: | Yes  No | | 1. Are any of the following (prohibited) solvents use in the production of this flavor:   Hydrocarbon solvents, chlorinated solvent, halogenated solvents, propane, hexane, or Freon? | Yes  No |  1. **Non-flavor constituents and other ingredients:**  Natural flavors authorized for use in NOP “organic” or “made with organic” products must not contain any synthetic carrier systems or any artificial preservatives. This extends to synthetic processing aids, emulsifiers or antioxidants, i.e., prohibited substances include, but are not limited to: propylene glycol, polyglycerol esters of fatty acids, mono- and di-glycerides, benzoic acid, polysorbate 80, medium chain triglycerides, BHT, BHA, triacetin, etc.  |  |  | | --- | --- | | 1. Please list any carrier system(s) used in this Natural Flavor Product or attach an Ingredient Statement.  No carrier system(s) used |  | | 1. Please list any preservative(s), other additives or foodstuff ingredients used in this Natural Flavor Product or attach an Ingredient Statement.   No preservative(s), or other additives used |  | | 1. Are any of the NON-flavor constituent’s synthetic (see definition in the Background section)? | Yes  No  N/A | | 1. If synthetic non-flavor constituents are used, are they listed on the NOP National List at § 205.605(b)? | Yes  No  N/A | | 1. Are any of the NON-flavor constituents USDA NOP certified Organic? | Yes  No  N/A | | 1. If glycerin is used, is it produced by hydrolysis of fats and oils?   **As of December 27, 2019**: glycerin (CAS # 56-81-5) will be listed on § 205.606. | Yes  No  N/A | | 1. If maltodextrin is used, is it hydrolyzed primarily by enzymes? | Yes  No  N/A | | 1. If citric acid is used, is it produced primarily by fermentation of carbohydrates? | Yes  No  N/A |  1. **Genetically Modified Organism (GMO)**. GMO uses 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).  |  |  | | --- | --- | | Was this flavor product (including any solvents, carriers, preservatives, or other processing aids used or contained therein) produced and handled using excluded (GMO) methods? | Yes  No |  1. **Ionizing Radiation** is prohibited for all uses involving food preservation, pest control and pathogen control in NOP products.  |  |  | | --- | --- | | Was ionizing radiation, as described in 21 CFR 179.26, used in the processing of this flavor product? | Yes  No |  1. **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.  |  |  | | --- | --- | | Was this flavor product derived from products using sewage sludge in their agricultural production? | Yes  No | | | |
| **Pursuant to 7CFR §205.605(a) and §205.105(e)(f)(g), I, on behalf of the supplier, hereby attest that the information provided in this form is accurate and truthful to the best of my knowledge.** *Falsifying statements to ACA’s or the Secretary under the NOP will be subject to possible fines.* | | |
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| **Signature** | | **Date** |