



European
Food-STA



Flavourings – Regulation (EC) n^o1334/2008

Focus on “Natural”

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Legal Framework

Food Improvement Agent Package (FIAP)

Package includes 4 regulations:

Regulation (EC) No 1334/2008	Flavourings
Regulation (EC) No 1333/2008	Food Additives
Regulation (EC) No 1332/2008	Food Enzymes
Regulation (EC) No 1331/2008	Common approval procedure for food additives, food enzymes and food flavourings

repealed and progressively replaced a number of directives and regulations

Regulations vs Directives

Immediate implementation as law in all Member States

Avoids different national interpretations



Legal Framework

Regulation (EC) No 1334/2008

Subject matter

(article 1)

Lays down rules on flavourings and food ingredients with flavouring properties for use in and on foods

Taking into account

(recital 7)

- Consumer interests through appropriate labelling
- Consumers health through risk assessment
- Other relevant factors as traditional, ethical, environmental factors

Tools

(article 1)

- Union List of flavourings and source materials approved (Annex I)
Commision Implementing Regulation (EU) No 872/2012
- Conditions of use (Chapter II)
- Rules on labelling (Chapter IV)



Legal Framework

Regulation (EC) No 1334/2008

Scope

(article 2)

- Flavourings which are used or intended to be used in or on foods
- Food ingredients with flavouring properties
- Food containing flavouring and/or food ingredients with flavouring properties
- Source materials for flavourings and/or food ingredients with flavouring properties

Does not apply:

- Substances which have exclusively a sweet, sour or salty taste
- Raw foods
- Non-compound foods and mixtures such as, but not exclusively, fresh, dried or frozen spices and/or herbs, mixtures of tea and mixtures for infusion as such as long as they have not been used as food ingredients



Legal Framework

Regulation (EC) No 1334/2008

Definitions

(article 3)

What is a flavouring?

- Products not intended to be consumed as such, which are added to food in order to impart or modify odour and/or taste

Consist of a:

- Flavouring part
- Non flavouring part (optional)



Legal Framework

Regulation (EC) No 1334/2008

Flavouring part categories:

(article 3)

- Flavouring substances (3.2b)

~~Natural flavouring substances~~
~~Natural-identical flavouring substances~~
~~Artificial flavouring substances~~

- Natural Flavouring substance (3.2c)
- (Synthetic) Flavouring substance

- Flavouring preparations (3.2d)

- Thermal process flavourings (3.2e)

- Smoke flavourings (3.2f)

- Flavour precursors (3.2g)

- Other flavourings (3.2h)



Flavouring Substance (3.2b)

A defined chemical substance with flavouring properties.

Natural Flavouring Substances (3.2c)

Flavouring substance obtained by appropriate physical, enzymatic or microbiological processes from material of vegetable, animal or microbiological origin either in the raw state or after processing for human consumption by traditional food preparation processes (Annex II).

Correspond to substances that are naturally present and have been identified in nature

Flavouring preparations (3.2d)

Products, other than flavouring substances, obtained from food or other material of vegetable, animal or microbiological origin by appropriate physical, enzymatic or microbiological processes either in the raw state of the material or after processing for human consumption by traditional food preparation processes (Annex II)

Are complex mixtures (ex. essential oils, extracts,...)

Natural Flavour

Only flavourings containing in their flavouring part solely **natural flavouring substances** and/or **flavouring preparations** can be labelled with the term **“natural”** (16.2)

Labelling

(article 15)

“Flavouring” or a “more specific description of the flavouring” is allowed

(ex. apple flavouring; banana flavouring;...)

Natural Labelling

(article 16)

4 possibilities to label natural flavourings :

- Natural flavouring substances (16.3)
- Natural X flavouring (16.4)
- Natural X flavouring with other natural flavourings (16.5)
- Natural flavouring (16.6)



Natural labelling

(article 16)

- **Natural flavouring substances** (16.3)

The flavouring component contains exclusively natural flavouring substances

- **Natural X flavouring** (16.4)

The description shall read **Natural “food(s) or food category or source(s)” flavouring’**

X

The flavouring component has been obtained exclusively or by at least 95 % by w/w from the source material referred to.

The remaining 5% (from other sources) should only be used to adjust natural variations in the flavour profile and/or to introduce special notes to the flavouring (ex. more fresh, green note,...)

- **Natural X and Y flavouring** (16.4)

When the total source material from the named sources is at least 95%(w/w) of the flavouring component.

The flavour perception of the named sources needs to be easily recognised. The major contributor by weight is mentioned first.



Natural labelling

(article 16)

- **Natural X flavouring with other natural flavourings** (16.5)

The description shall read '**Natural "food(s) or food category or source(s)" flavouring with other natural flavourings**'

X

The flavouring component is partially derived from the source material referred to, the flavour of which can easily be recognised.

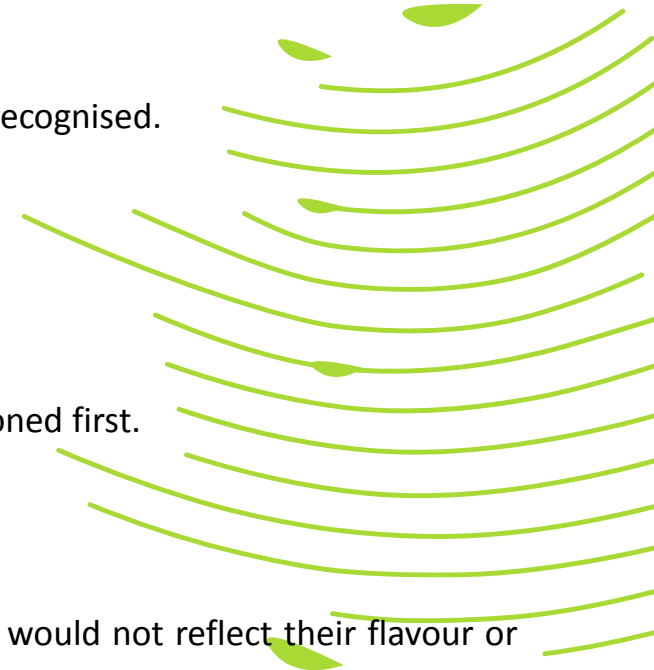
- **Natural X and Y flavouring with other natural flavourings** (16.5)

When source material of both named sources is present.

The flavour perception of the named sources needs to be easily recognised. The major contributor by weight is mentioned first.

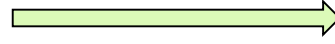
- **Natural flavouring** (16.6)

The flavouring component is derived from different source materials and where a reference to the source materials would not reflect their flavour or taste.



Natural is more complex ...

≥ 95% flavouring part derived **from Strawberry**

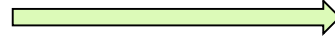


Natural Strawberry
Flavouring

Natural flavouring
substances
(if all flavouring part is natural
flavouring substances)

< 95% flavouring part derived **from Strawberry**

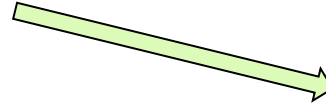
Overall profile Strawberry



Natural Strawberry Flavouring
with other natural flavourings

0% flavouring part derived **from Strawberry**

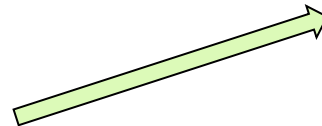
Overall profile Strawberry



Natural Flavouring

10% flavouring part derived **from Strawberry**
90% flavouring part derived **from other sources**

Overall profile Strawberry does not result from the strawberry



READY FOR A
QUIZ ?



Mixtures of Natural Flavouring Substances

Flavouring component (only contains natural flavouring substances)	Labelling “natural”	Alternative labelling
<p>95% natural flavouring substances derived from mint (eg. menthol)</p> <p>5% substances derived from orange (eg.limonene)</p> <p>To add a special note</p>	<p>“Natural flavouring substances”</p> <p>or</p> <p>“Natural mint flavouring”</p>	<p>Flavouring</p> <p>or</p> <p>Mint flavouring</p>
<p>94% natural flavouring substances derived from mint (eg. menthol)</p> <p>6% natural flavouring substances derived from apple (eg an acid) to adjust natural variations</p>	<p>“Natural flavouring substances”</p> <p>or</p> <p>“Natural mint flavouring with other natural flavourings”</p>	<p>Flavouring</p> <p>or</p> <p>Mint flavouring</p>
<p>100% natural flavouring substances derived from apple and/or raspberry and/or orange</p> <p>Apple, raspberry and orange are not recognizable in overall banana profile</p>	<p>“Natural flavouring substances”</p> <p>or</p> <p>“Natural flavouring”</p>	<p>Flavouring</p> <p>or</p> <p>Banana flavouring</p>

Natural X Flavouring

the flavouring component has been obtained exclusively or by at least 95 % by w/w from the source material referred to



Flavouring component (only contains natural flavouring substances and/or flavouring preparations)	Labelling “natural”	Alternative labelling
<p>95% derived from mint (eg. menthol and/or mint oil)</p> <p>5% derived from orange to add a special note</p>	“Natural mint flavouring”	<p>Flavouring or Mint flavouring</p>
<p>97% derived from raspberry</p> <p>3% derived from apple to adjust natural variations</p>	“Natural raspberry flavouring”	<p>Flavouring or Raspberry Flavouring</p>
<p>55% derived from orange</p> <p>40% derived from tangerine</p> <p>5% derived from strawberry (for a specific note)</p>	<p>“Natural orange and tangerine flavouring”</p> <p>or</p> <p>“Natural citrus flavouring”</p>	<p>Flavouring or Orange and Tangerine Flavouring</p>

Natural X flavouring with other natural flavourings

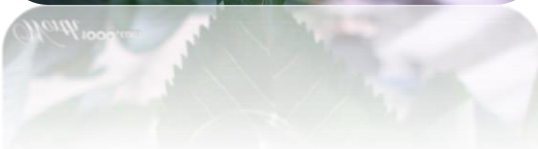
The flavouring component is partially derived from the source material referred to, the flavour of which can easily be recognised



Flavouring component (only contains natural flavouring substances and/or flavouring preparations)	Labelling “natural”	Alternative labelling
94% derived from mint (eg. menthol and/or menthol oil) 6% derived from orange for a specific note	“Natural mint flavouring with other natural flavourings”	Mint Flavouring or Flavouring
50% derived from orange 40% derived from tangerine 10% derived from strawberry for a specific note	“Natural Orange and tangerine flavourings with other natural flavourings” or “Natural citrus flavouring with other natural flavourings”	Citrus Flavouring or Flavouring

Natural Flavouring

The flavouring component is derived from different source materials and where a reference to the source materials would not reflect their flavour or taste

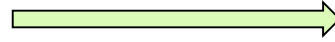


Flavouring component (only contains natural flavouring substances and/or flavouring preparations)	Labelling “natural”	Alternative labelling
0% derived from cherry 100% derived from other sources than cherry Overall profile cherry	“Natural flavouring”	Cherry flavouring or Flavouring
10% derived from cherry 90% derived from other sources than cherry Overall profile is cherry which comes from the other 90% source materials	“Natural flavouring”	Cherry flavouring or Flavouring
20% derived from hazelnut 80% derived from other natural sources (eg. strawberry, raspberry,...) Overall flavour profile is hazelnut which comes from the other 80% of the source materials	“Natural flavouring”	Hazelnut flavouring or Flavouring



Natural is more complex ...

≥ 95% flavouring part derived **from Strawberry**

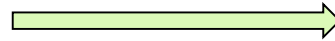


Natural Strawberry
Flavouring

Natural flavouring
substances
(if all flavouring part is natural
flavouring substances)

< 95% flavouring part derived **from Strawberry**

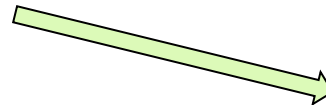
Overall profile Strawberry



Natural Strawberry Flavouring
with other natural flavourings

0% flavouring part derived **from Strawberry**

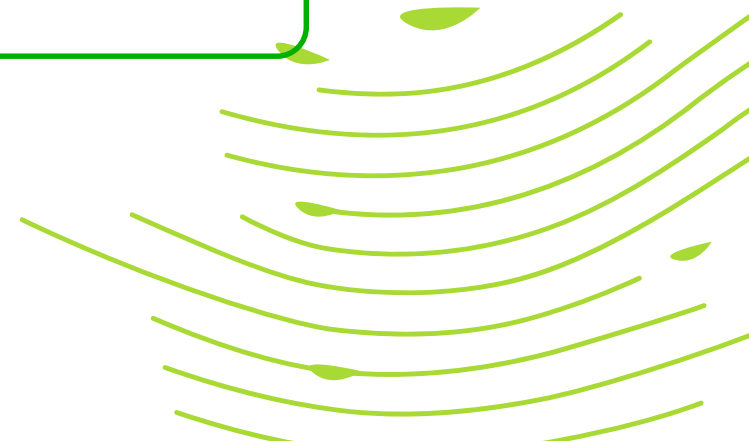
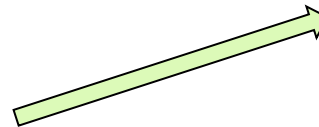
Overall profile Strawberry



Natural Flavouring

10% flavouring part derived **from Strawberry**
90% flavouring part derived **from other sources**

Overall profile Strawberry does not result from the strawberry



Words Matter

Product with:

Natural Flavouring + Natural Strawberry Flavouring with other natural flavourings (WONF)

Labelling :

Flavouring

or

Natural flavouring; Natural strawberry flavouring with other natural flavourings

Labelling : Natural flavouring

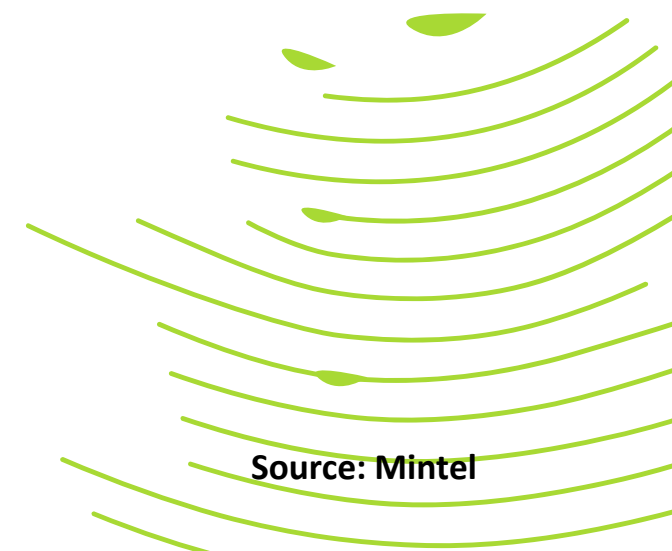
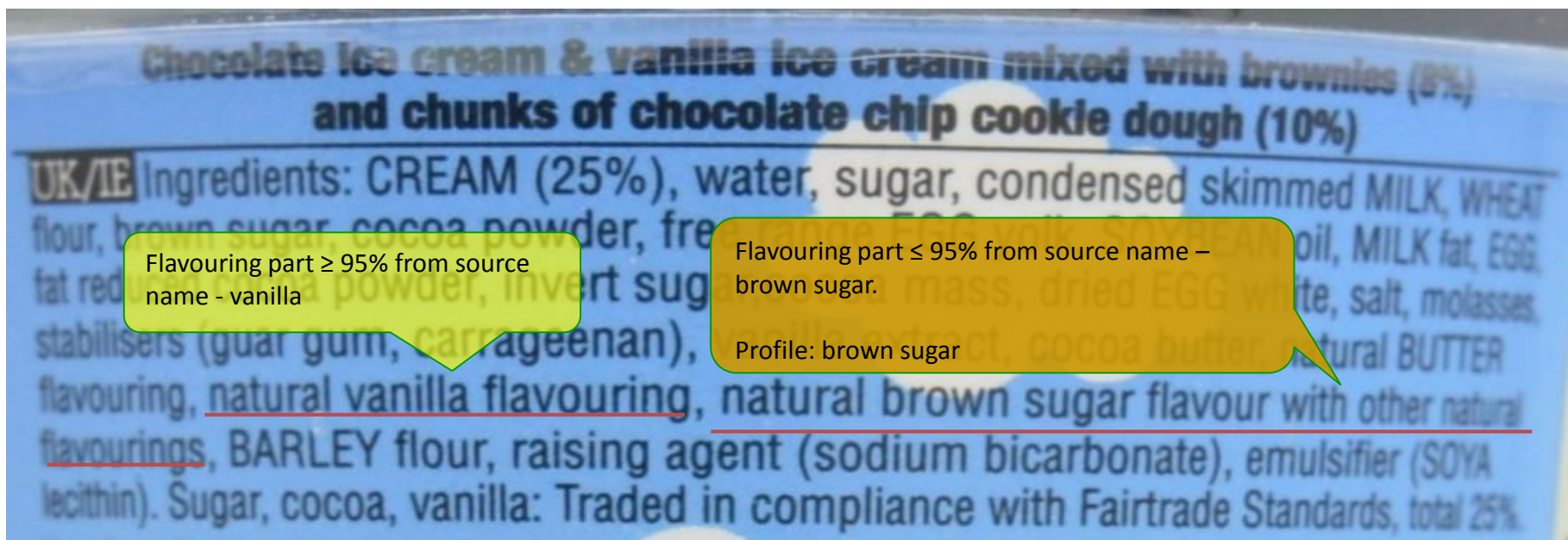


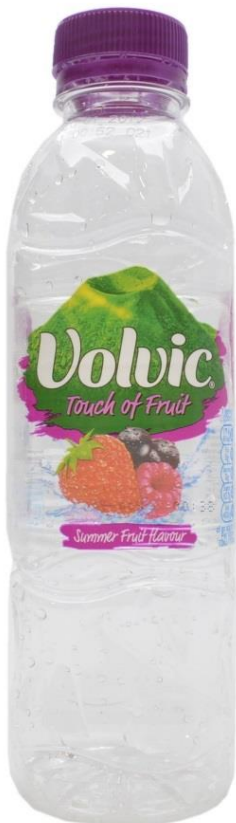


The source name does not reflect the profile

Flavouring part $\geq 95\%$ from source name - vanilla

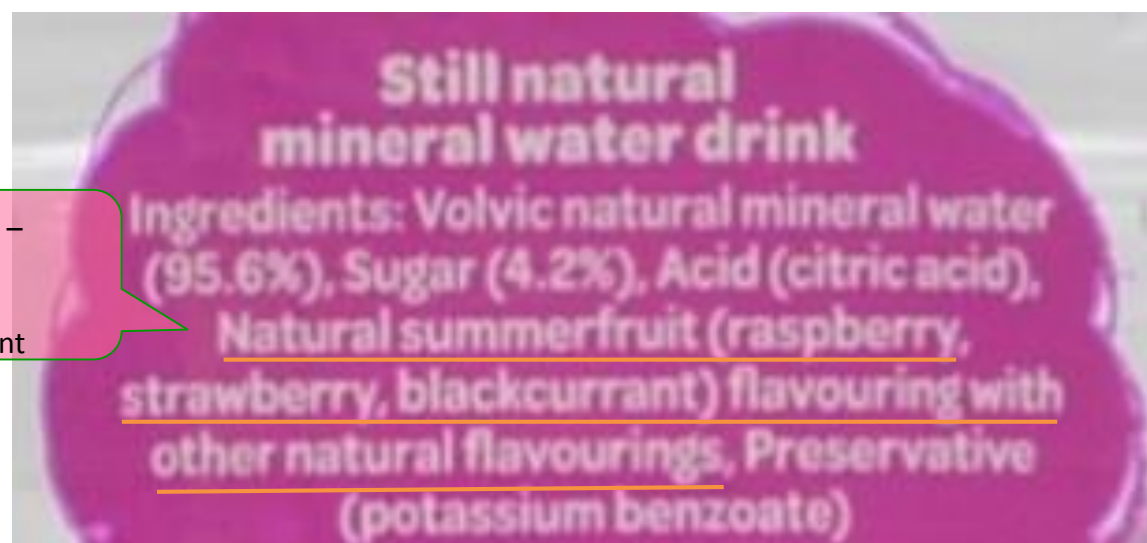
Ingredients: sugar, cocoa butter, whole MILK powder, strawberries dried (10%), strawberry powder (4%), natural flavour, emulsifier (SOY LECITHIN), acidity regulator (citric acid), natural vanilla flavour





Flavouring part $\leq 95\%$ from source name –
raspberry, strawberry, blackcurrant

Profile: raspberry, strawberry, blackcurrant





Flavouring part $\geq 95\%$ from source name - vanilla

Carbohydrate 11.6g, of which sugars 5.6g, Protein 1.1g, Salt 0.1g.
Ingredients: Belgian Dark Chocolate (37%)(Cocoa Mass, Sugar, Cocoa Butter, Emulsifier (SOYA Lecithin), Natural Vanilla Flavour), WHEAT Flour (WHEAT Flour, Calcium Carbonate, Iron, Niacin, Thiamin), Sugar, Palm Oil, Rapeseed Oil, WHEAT Starch, Butter (MILK), Natural Peppermint Flavour with other Natural Flavourings, Raising Agents (Diphosphates, Sodium Carbonates, Calcium Phosphates), Skimmed MILK Powder, Salt, Colours (Annatto, Curcumin).
May contain traces of NUTS. Suitable for vegetarians. Free from pork fats and alcohol.

Flavouring part $\leq 95\%$ from source name – peppermint

Profile: peppermint



Natural
flavouring

The source name
does not reflect
the profile

Natural
raspberry
flavour WONF

Flavouring part $\leq 95\%$
from source name:
raspberry

YAOURT À BOIRE SUCRÉ AROMATISÉ, SOURCE DE CALCIUM ET DE VITAMINE D
INGRÉDIENTS Lait partiellement écrémé (Origine : France), sucre (8,1%), (saveur
fraise : arôme naturel)* ou (saveur framboise : arôme naturel de framboise avec autres
arômes naturels)* ou (saveur vanille : arôme naturel de vanille)*, concentré des
minéraux du lait, ferments lactiques, vitamine D. *selon les parfums.

Natural vanilla
flavouring

Flavouring part $\geq 95\%$
from source name: vanilla

Useful Links

You might find these links handy.

Eur-Lex: <http://eur-lex.europa.eu/homepage.html>

- EU Law (Regulations, Directives, consolidated legislation,...)

EFFA –European Flavour Association: <http://effa.eu/>

- Guidelines,...





Obrigada

Thank You

