



Natural Flavor Affidavit

Vermont Organic Farmers, LLC (VOF)

The USDA accredited certification agency owned by NOFA Vermont

VOF Office: 802-434-3821 vof@nofavt.org www.nofavt.org/vof

Natural flavors are allowed as non-organic ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))" provided they comply with provisions established in the USDA National Organic Program (7 CFR Part 205).

Section 205.605 (a)(9) states: Flavors—nonsynthetic flavors may be used when organic flavors are not commercially available. All flavors must be derived from organic or nonsynthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative.

VOF certified producers must perform a commercial availability search at least annually and provide proof of the search to the on-site inspector or upon request by the VOF office.

Background Information:

The National Organic Program definitions, in 205.2: *Non-synthetic* (natural) is 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)). *Synthetic* is 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)(g) prohibit "excluded" methods (GMOs), ionizing radiation, or sewage sludge, defined in 205.2, from being used in the production or handling of any ingredients or products under the NOP.

The FDA definition of a Natural Flavor: 21 CFR 101.22 reads: The term 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 the natural essence or extractives obtained from plants listed in Secs. 182.10, 182.20, 182.40, and 182.50 and part 184 of this chapter, and the substances listed in Sec. 172.510 of this chapter.

The following must be completed by a knowledgeable representative of the flavor manufacturer:

General Information

Natural Flavor Product Code:

Natural Flavor Product

Name:

Manufacturer Name and Address:

Vermont Organic Farmers LLC
PO Box 697 · 14 Pleasant Street · Richmond VT 05477 · 802-434-3821
Certified **Organic, Locally Grown**

Date Created:

Date Revised: 6.27.14; 9.10.21

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

	Compounded flavor		Extracts		Isolate
	Compounded WONF (with other natural flavors)		Essential oil		Oleoresin
	Distillate		Essential oil Isolate		Other (e.g. single flavor chemical):

Natural Flavor Product

A. Flavor constituents

- 1) Do all of the flavor constituents in the natural flavor product named above meet the FDA definition of a natural flavor at 21CFR Part 101.22(a)(3)? Yes No
- 2) Natural flavors authorized for use in NOP "organic" or "made with organic" product, in addition, must not be produced using synthetic extraction solvents. Extraction may only use non-synthetic, no-petroleum based solvents. Allowed natural extraction solvents include water, natural ethanol, super-critical carbon dioxide, authentic essential oil, and natural vegetable oils. No hydrocarbon solvents or chlorinated or halogenated solvents may be used. Propane, hexane, and Freon are example of synthetic solvents that are prohibited.

List any solvents used during the manufacturing of each Natural Flavor component: _____

B. Non-flavor constituents and other ingredients

- 1) 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 e.g., propylene glycol, polyglycerol esters of fatty acids, mono and di glycerides, benzoic acid, polysorbate 80, medium chain triglycerides, BHT, BHA, triacetin, etc.

List any carrier system(s) used in this Natural Flavor Product or attach an ingredient statement: _____

List any preservative(s), other additives or foodstuff ingredients used in this Natural Flavor Product or attach an Ingredient Statement: _____

- 2) If nonorganic glycerin (CAS# 56-81-5) is used, was it produced from agricultural source materials and processed using biological or mechanical/physical methods as described under NOP Rule Section 205.270(a)? Yes No
- 3) If maltodextrin was used, was hydrolysis primarily carried out by enzymes? Yes No
- 4) If citric acid was used, was it produced by microbial fermentation of carbohydrate substances? Yes No

Prohibited Methods/ Compliance with Sections 205.105(e), (f), and (g)

A. Genetically Modified Organism (GMO) products may not be used at any stage in the process of making natural flavors. Excluded methods – 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). Therefore, GMO-plant extracts may not be used; natural flavors may not be the product of GMO-yeast fermentation.

This natural flavor product, including any solvents, carriers, preservatives or processing aids used or contained therein, was **NOT** produced or handled using excluded (GMO) methods? True False

B. Ionizing radiation is prohibited for all uses involving food preservation, pest control and pathogen control. Other radiation uses, including food inspection, are permitted, provided such use meets applicable FDA regulations, which establish limitations applicable to all (organic and non-organic) food products.

Ionizing radiation as described in 21 CFR 179.26 was **NOT** used in the processing of this natural flavor product? True False

C. 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.

This natural flavor product was **NOT** derived from products using sewage sludge in their agricultural production or handling? True False

§205.100 (c) Any operation that:

- 1) Knowingly sells or labels a product as organic, except in accordance with the Act, shall be subject to a civil penalty of not more than the amount specified in §3.91 (b)(1) of this title per violation.
- 2) Makes a false statement under the Act to the Secretary, a governing State official, or an accredited certifying agent shall be subject to the provisions of section 1001 of title 18, United States Code.

I declare under penalty of perjury (under the laws of the United States of America) that the foregoing is true and correct.

Company Name: _____

Phone/e-mail: _____

Printed Name: _____

Title: _____

Signature: _____

Date: _____

(digital signature acceptable)

Falsifying statements to ACA's or the Secretary under the NOP will be subject to possible fine