



Policy Memorandum

To: Stakeholders and Interested Parties

From: Miles McEvoy, Deputy Administrator

Subject: Use of Natural Flavors

Date: Original Issue Date – January 21, 2011
Updated March 20, 2024

In 1995, the National Organic Standards Board (NOSB) reviewed the use of natural flavors and recognized that natural flavors are complex; they are derived from natural sources and are compound substances derived from plants, herbs, spices and botanicals.

Natural flavors are typically used in very small amounts (approximately 0.05 to 0.40 percent of ingredients) in products that, due to functional attributes, contain less than optimal amount of flavor necessary to give the finished products the desired flavor profile. They are widely used in dairy products, baked goods and juice products, as well as in other foods. As a result, the NOSB recommended that flavors be placed on the National List as nonsynthetic substances in § 205.605(a). In the National Organic Program (NOP) regulations published in 2001, flavors were included on the National List as nonsynthetic substances allowed as ingredients in processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).”

The purpose of a flavor as described by the Food and Drug Administration (FDA) is not to provide any nutritional or caloric purpose in the final product (21 CFR 101.22). NOP regulations allows the use of natural flavors as long as they meet the FDA definition of a flavor, and comply with 7 CFR 205.605(a).

The NOP recognizes that some accredited certifying agents are certifying flavors that meet the NOP requirements for handling of organic products, and that this product market will continue to grow and develop. The NOSB anticipated this would occur when they drafted their recommendation in 1995, and will continue to evaluate the appropriateness of retaining the listing of flavors as currently defined.

References:

NOP Regulations (7 CFR Part 205)

7 CFR 205.605(a) 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.

Other Laws, Regulations and Sources

[21 CFR 101.22](#). Foods; labeling of spices, flavorings, colorings and chemical preservatives.

(a) (3) 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 §§ 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.

[Overview of Flavor Additives, 2005. Prepared for the USDA NOP and the NOSB, Oct. 14, 2005](#)

NOSB Recommendations

1995. Final Recommendation Addendum Number 14, The Use of Natural Flavors in Organic Food.

<https://www.ams.usda.gov/sites/default/files/media/NOSB%20Meeting%20Minutes%26Transcripts%201992-2009.pdf>

Document Control:

This document supersedes “NOP Guidance for Certifiers on Flavors” dated February 16, 2007, which is now obsolete.