

Natural Flavourings permitted in EC reg 2018/848



Guidance for meeting 848

Please email businesssupport@soilassociation.org for a copy of our 848 input comparison spreadsheet

Flavourings included in 5% permitted non-organic ingredient

Natural flavourings are included in the product calculations as agricultural ingredients

Non-organic flavourings must not exceed 5% by weight of the product if it is to be labelled as an organic product, i.e. containing $\geq 95\%$ organic ingredients

This is different from 834/2007 GB regs which does not include flavourings in the percentage calculation consumer's request or pet food which is prepacked for direct sale

95% of flavouring component must come from named food

The term 'natural' may only be used in combination with a reference to a food, food category or a vegetable or animal flavouring source if the flavouring component has been obtained exclusively or by at least 95 % by w/w from the source material referred to

This means at least 95%, must be from the source material referred to and the remaining 5% could include natural substances that are labelled according to Article 16(3)

These are also referred to as 95/5

For example, Natural lemon Flavouring: 95% of the flavour must come from lemons. The remaining 5% could include natural substances that are labelled according to Article 16(3), so for a lemon flavour, the remaining 5% does not have to come from lemons

For some flavours, this restriction is challenging in terms of being able to produce a product with an acceptable flavour profile, e.g. some fruit teas or sweet flavours

Identifying natural flavourings on labelling

It is likely they will be required to be labelled as follows:

- Natural flavourings must be identified by their food source, e.g. 'natural cheese flavouring', 'Natural lemon flavouring' rather than just 'Natural Flavouring'
- If a product contains a cheese flavouring and an onion flavouring they could be described as 'cheese and an onion flavouring'
- A 'specific name' can also be used. For example, a flavouring that is a mint extract which is obtained 100% from mint source can be designated by its more specific name such as 'mint extract'

Action to take if your product contains non-organic flavouring

- Check percentage used in product does not exceed 5%. Ensure take into account any other non-organic ingredients used that may also contribute to the total % of non-organic
- If exceeds 5% switch to organic flavouring, or reformulate to reduce to 5% or less

- Get confirmation from flavouring supplier that flavouring is a natural flavouring substance or natural flavouring preparations labelled in accordance with 1334/2008 article 16(2), (3) and (4)
- If compliant the confirmation will need to detail the specific flavour/s
- If not compliant you will need to source a compliant version. We will require a completed Soil Association Certification flavour declaration for each new flavour you wish to use

Organic flavourings

- At least 95 % of the agricultural ingredients of the product by weight must be organic
- Art. 30 (5)(a) 2018/848: 'in the case of flavourings, they are only used for natural flavouring substances and natural flavouring preparations labelled in accordance with Article 16(2), (3) and (4) of Regulation (EC) No 1334/2008 and all of the flavouring components and carriers of flavouring components in the flavouring concerned are organic.'
- This means organic flavouring must also comply with the restrictions on types of natural flavours, as outlined above
- Flavouring components must be organic, although up to 5% non-organic flavouring may be used provided it complies with the restrictions on types of natural flavours, as outlined above
- Carriers used must be organic, although up to 5% non-organic carriers may be used, provided they are listed in the organic regulation as permitted non-organic (if any other non-organic ingredients are used ensure total does not exceed 5%)
- Only additives or processing aids listed in the organic regulation may be used. 2018/848 (implementing act 2021/1165)
- View our 848 input comparison spreadsheet for details of additives and processing aids

Permitted carriers and solvents

- **Glycerol** - Only from plant origin - must be organic
- **Calcium sulphate** - products of plant origin - only as carrier
- **Ethanol** - as an extraction solvent

Action to take if you produce or- ganic flavourings

- Review your current products to check if they currently comply or will require reformulation and/or labelling amendments
- Are any non-organic carriers used? Are they listed in 848 as permitted non-organic carriers?
- Are any non-organic natural flavourings used? Are they labelled in accordance with 1334/2008 article 16(2), (3) and (4)?

Action to take if you use organic flavourings

- Check with your flavouring supplier if the flavouring you use already meets 2018/848 requirements
- If you use an organic essential oil to flavour your product this will be compliant, e.g. orange essential oil

FAQs

My organic product is made in the EU/certified in a 3rd country to 2018/848, do I need to take any action? No, provided you have valid organic certificate for the products, you do not need to take any other action.

I am sourcing organic flavourings from a supplier certified in the EU to 2018/848, do I need to take any action? Provided you have valid organic certificate for the products, you do not need to take further action to verify the flavouring is compliant.

Do I have to use organic flavourings? No, provided the percentage used in the product does not exceed 5%. Ensure you take into account any other non-organic ingredients used that may also contribute to the total % of non-organic.

Do I have to switch to compliant flavourings before the SPS agreement comes into effect? We are waiting for confirmation from Defra as to whether a transition period will be allowed, but Defra advise businesses should start planning now.

What about product that has already been made prior to the SPS agreement coming into force/ will that still be allowed to be placed on the market? We are awaiting for confirmation from Defra as to whether a transition period will be allowed. We understand this forms part of the negotiations.

For queries or support, get in touch with the team at food.drink@soilassociation.org.