

TECHNICAL BULLETIN #2008-9 REGULATORY ISSUES REGARDING "NATURAL" INGREDIENTS and FOOD COLORS

Definition of "Natural" in the United States for products manufactured in FDA regulated facilities

Contrary to common misconceptions, the United States FDA does not have a legal definition for "Natural".

However, as indicated in the Federal Register / Vol. 58, No. 3 / Wednesday, January 6, 1993 / Rules and Regulations (Page 2407), the FDA does indicate:

"the agency will maintain its policy (Ref. 32) regarding the use of "natural," as meaning that nothing artificial or synthetic (**including all color additives regardless of source**) has been included in, or has been added to, a food that would not normally be expected to be in the food."

Definition of "Natural" in the United States for products made in USDA regulated facilities

Unlike the FDA, the **USDA, which regulates the meat and poultry industries, does have a definition of "Natural":**

A product containing no artificial ingredient or added color and is only minimally processed (a process which does not fundamentally alter the raw product) may be labeled natural. The label must explain the use of the term natural (such as - no added colorings or artificial ingredients; minimally processed).

Sources: http://www.fsis.usda.gov/OPPDE/larc/Claims/Organic_Claims.htm <http://www.fsis.usda.gov/OPPDE/rdad/FRPubs/2006-0040.pdf>

Use of Natural "Colorants" in the United States

The FDA has a relatively short and very specific list of ingredients derived from "Natural" sources such as vegetables, fruits, plants, spices, minerals, etc. which are approved for use as food additives. Unlike FD&C Dyes and Lakes, these "Natural" colorants do not require "Batch Certification" by the FDA. The complete list can be found at <http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfCFR/CFRSearch.cfm?CFRPart=73>

It is important to note that the FDA considers any ingredient added to a product to intentionally change the color of that product to be an "Artificial Color", even if that ingredient is considered "Natural".

Natural "Colorants" vs. Natural "Ingredients" Which Impart Color

Please note that there are many "Natural Ingredients" such as Spinach, Alfalfa, Barley Grass Juice, etc. which impart color and which are **approved by the FDA as "Ingredients"**. However, it is very important to note that these ingredients **are NOT approved by the FDA for use as "color additives"**. While IFC does offer a variety of ingredients that impart color which are not approved as food colorants, we strongly recommend that our customers consult their regulatory experts before considering using any of these ingredients in their product(s).

Regarding IFC "Natural" Products

1) For Non-Colorant products:

We consider an IFC product to be "Natural" if it is minimally processed and does not contain artificial/synthetic ingredients or preservatives.

2) For Colorants:

We consider ingredients that are approved by the FDA as colorants that are derived from "Natural" sources such as vegetables, fruits, plants, spices, minerals, etc. to be "Natural Colors".

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