

November 6, 2014

National List Manager USDA/AMS/NOP, Standards Division 1400 Independence Ave. SW Room 2648-So., Ag Stop 0268 Washington, DC 20250-0268

Re: Petition to amend the annotation to Flavors on the National List as a non-agricultural (non-organic) substance allowed in or on processed products labeled as "organic or "made with organic (specified ingredient)," at §205.605(a).

#### Dear National List Manager:

Please accept the attached petition to revise the current listing of Flavors on the National List to require organic flavors to be used in products labeled as "organic" when they are commercially available in the necessary quality, quantity or form. The proposed change is as follows (changes in red):

Flavors – Non-synthetic flavors may be used in products labeled as "organic" when organic flavors are not commercially available. All flavors must be derived from organic or non-synthetic sources only, and must not be produced using synthetic solvents and carrier systems or any artificial preservative.

Natural flavors appear on the National List as a broad category listing, therefore many different natural forms are allowed. Examples include extracts, oleoresins, essential oils, compounded flavors, and distillates. OTA believes that the number of certified organic flavors currently in the marketplace is substantial. However the number of available certified organic flavors is not sufficient to meet the current needs of the marketplace, given the numerous and different types and forms used by the organic sector. Currently, there is no requirement to use organic flavors; all use is voluntary at this time.

In order to further the use and development of organic flavors, OTA is submitting this petition to revise the current listing of Flavors to require organic flavors in products labeled "organic" when they are commercially available in the necessary quality, quantity or form.

Historically, commercial availability only applied to § 205.606. However, moving Flavors from §205.605 to § 205.606 would cause a significant disruption to the industry. The complexity of such a broad category and the significant number of distinctly different natural flavor makes it impractical to individually list flavors on the National List. This was acknowledged by the NOSB at both Sunset Reviews.

Furthermore, the NOSB on October 28, 2010 applied the concept of commercial availability to yeast, listed on § 205.605(a), when used as a food or fermentation agent in products labeled as "organic." And on February 11, 2010, a petition was submitted to NOSB to remove silicon dioxide from §205.605(b) because rice hulls can serve as an alternative. The final decision by the board on December 2, 2011 was to add an annotation for Silicon dioxide stating "Permitted as a defoamer. Allowed for other uses when organic rice hulls are not

commercially available." In both these cases, the NOSB recognized that organic alternatives had been developed and were available for use although not sufficiently available. Through the decisions to extend the concept of commercial availability to non-agricultural nonsynthetic, as well as agricultural, materials, the NOSB has encouraged the organic sector to continuously increase its use of organic ingredients and to invest in the development of organic alternatives to other substances or ingredients used in organic handling operations.

OTA is requesting that the NOSB again encourage and support continuous improvement by mandating the use of organic flavors when commercially available.

Thank you for your assistance in putting this petition before the NOSB. If you need any additional information, please contact me via email or telephone: <a href="mailto:gwyard@ota.com">gwyard@ota.com</a> or (503) 798-3294.

Respectfully submitted,

Hwendolyn V. Wyank

Gwendolyn Wyard

Regulatory Director of Organic Standards and Food Safety

Organic Trade Association (OTA)

CC: Laura Batcha, Executive Director / CEO, OTA

#### Item A

This petition seeks to amend the annotation to FLAVORS on the National List as a non-agricultural (non-organic) substance allowed in or on processed products labeled as "organic" or "made with organic (specified ingredients)," at §205.605(a) as follows:

Flavors – Non-synthetic flavors may be used in products labeled as "organic" when organic flavors are not commercially available. All flavors must be derived from organic or non-synthetic sources only, and must not be produced using synthetic solvents and carrier systems or any artificial preservative.

#### Item B

#### 1. The substance's chemical or material common name.

**Natural Flavors**, defined as follows:

21 CFR 101.22 Foods; labeling of spices, flavorings, colorings and chemical preservatives. 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.

#### 2. The petitioner's name, address and telephone number and other contact information.

The Organic Trade Association The Hall of the States 444 N. Capitol St. NW. Suite 445A Washington D.C. 20001

Contact Person: Gwendolyn Wyard

Title: Regulatory Director, Organic Standards and Food Safety

Phone: (503) 798-3294 Email: gwyard@ota.com

#### 3. The intended or current use of the substance.

Natural flavors are derived from natural sources and are compound substances derived from plants, herbs, spices and botanicals. They are typically used in very small amounts in products (approximately 0.05 to 0.40 percent of ingredients) that contain less than optimal amount of flavor necessary to give the finished products the desired flavor profile. Natural flavors are widely used in baked goods, dairy products, jams and jellies, snack foods, and juice products, as well as in many other foods. Natural flavors are often proprietary formulations developed specifically for their intended purpose and functionality of the finished product.

#### 4. A list of the handling activities for which the substance will be used.

Flavors are aromatic organic chemicals that are added in small amounts to products to achieve a specific flavor profile. According to the Food and Drug Administration (FDA), a flavor is not to provide a nutritional purpose in the final product (21 CFR 101.22).

In the current listing for "Flavors" on §205.605(a) as a broad category, commercial availability does not apply and there is no requirement that the organic alternatives that have been developed be used when available. This petition requests a change to the annotation such that certified organic flavors must be used in certified organic products when commercially available. Consistent with the composition requirements indicated in §205.301(c), certified organic flavors would not be required in products labeled "made with (specified organic ingredients or product(s)."

#### 5. The source of the substance and a detailed description of its manufacturing procedures.

Flavors are materials which are comprised of flavor compounds derived from natural (non-synthetic) bases (typically botanicals such as herbs, spices, fruits or compounds derived from fermentation), a carrier (ethanol, propylene glycol, etc.), and agents which help preserve the natural flavors (glycerin, acetic acid, etc.). The natural constituents included in the flavor are extracted using a number of natural and synthetic solvents. Although synthetic solvents are expressly prohibited in the production of natural flavors allowed in National Organic Program certified products, the solvents used in general for flavors (in non-organic products) may be alcohols, ethyl acetate, hexane or acetone and are chosen based on their physical and chemical properties and their ability to extract the desired natural constituent. The solvents are removed by evaporation with the final flavor compounds including trace amounts of the solvents (typically <10ppm).

Note that per the current annotation for Flavors, synthetics solvents such as propylene glycol and hexane are prohibited, as well as synthetic carriers and artificial preservatives –

"Flavors, nonsynthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative."

According to the FDA (21 CFR 101.22), "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."

The general manufacturing process is implied by the nomenclature of the type of natural flavor. Please refer to Appendix A for more details about the nomenclature.

# 6. A summary of any available previous reviews by State or private certification programs or other organizations of the petitioned substance.

Flavors are currently on the National List of Allowed and Prohibited Substances for use in organic foods. Flavors were not added to the National List as the result of a petition. Instead, they were included among substances initially placed on the National List when USDA promulgated regulations pursuant to the Organic Food Production Act of 1990. (See Appendix B - National Organic Standards Board Final Recommendation Addendum Number 14).

In 2005, the NOSB Handling Committee requested and received a technical overview on flavors for review in preparation for their 2006 Sunset Recommendation (See Appendix C).

In 2010, the NOSB Handling Committee reviewed Flavors again with the following recommendation:

"In order to avoid unnecessary disruption to industry, we are recommending relisting of Flavors on §205.605(a), but we are also communicating our belief that the full category should not be relisted in five years when next reviewed for sunset. Instead, we are recommending that the NOSB, in consultation with the National Organic Program, establish a Flavors Task Force." (See Appendix D).

OTA subsequently formed a Flavor Task Force in 2011 to review the category of flavors currently listed on the §205.605(a) to determine if there are natural flavors that should be

considered agricultural and required to be organically produced. In April 2011, the Task Force's Recommendation was:

- No rule change to current listing of Flavors, non-synthetic on §205.605(a);
- NOSB to recommend guidance to the NOP on the types of flavors that are agricultural;
- Agricultural flavors must be organic, with the exception that non-organic agricultural flavors can be used in organic products if listed on §205.606 and commercially unavailable in organic form.
- NOP to provide a phase-in-period to allow types of agricultural flavors that are not yet commercially available as "organic" to be petitioned onto §205.606.

Next steps were identified, including considering possible wording changes to the Flavors listing and annotation in §205.605(a). (See Appendix E).

# 7. Information regarding EPA, FDA, and State regulatory authority registrations, including registration numbers.

Flavors are regulated by FDA under the authority of the Food Additives and Amendment Act (FAA) of 1958. All flavors are either GRAS ("generally recognized as safe") as determined by the Flavor and Extract Manufacturers Association of the United States (FEMA) GRAS assessment program *or* food additives, which must be approved for use by FDA.

For more details on FDA and FEMA assessment, see Appendix C.

# 8. The Chemical Abstracts Service (CAS) number or other product numbers of the substance and labels of products that contains the petitioned substance.

Not Applicable to the listing at §205.605. CAS registry numbers are unique numeric identifiers that designate only one specific substance. Because Natural Flavors is a large group encompassing thousands of individual substances, there is no CAS registry number assigned to the broad category listing on the National List.

#### 9. The substance's physical properties and chemical mode of action

These substances are all aromatic organic chemicals, and most have simple, well-characterized structures with a single functional group (e.g., alcohol, ketone) and a low molecular weight (<300 g/mol). Aliphatic acyclic and acyclic alcohols, aldehydes, ketones, carboxylic acids and related esters, lactones, ketals, and acetals comprise more than 700 of the 1,323 chemically defined flavoring substances in the United States. (See Appendix C)

#### 10. Safety information about the substance.

Flavors are regulated by the Food and Drug Administration (FDA) in the United States and are either "generally recognized as safe" (GRAS) substances *or* food additives, which must to be approved by FDA. Manufacturers that produce flavors that are considered food additives must submit petitions to FDA containing specific information so that the flavors can be evaluated for safety when consumed by humans. (See Appendix C)

#### 11. Research information about the substance.

Since the first recommendation by the National Organic Standards Board to include the use of Natural Flavors in organic foods in 1995, there has been the expectation that over time, manufacturers would begin to produce certified organic flavors and efforts would be made to support the use and development of organic flavors.

NATIONAL ORGANIC STANDARDS BOARD FINAL RECOMMENDATION ADDENDUM NUMBER 14 THE USE OF NATURAL FLAVORS IN ORGANIC FOODS Date adopted: October 31, 1995

Additionally, manufacturers shall provide written documentation in their Organic Handling Plan showing efforts made toward the ultimate production of an organic natural flavor as listed in the stepwise progression below:

Natural flavor constituents and non-synthetic carrier base and preservative agents (ex. grain ethanol, non-synthetic glycerin and non-synthetic acetic acid.).

Organic flavor constituents, organic carrier base, and organic preservative agents.

Organic flavor constituents extracted using organically produced solvents, organic carrier base, and organic preservative agents.

(See Appendix B)

#### OVERVIEW OF FLAVOR ADDITIVES

Prepared for the USDA National Organic Program and the National Organic Standards Board October 14, 2005

Manufacturers must provide written documentation in their Organic Handling Plan, which shows that efforts were made toward the ultimate production of an organic natural flavor...

(See Appendix C)

#### NOP Guidance for Certifiers on Flavors

#### February 16, 2007

We recognize that there are some ACAs certifying flavors... Over time, there may be more sources of organic flavors...we hope that there will be; in fact, the NOSB anticipated that this would occur when they drafted their recommendation in 1995, over a decade ago. However, these flavors are more simplistic and may not deliver complex flavor profiles demanded by consumers. As technologies emerge, this might change. If it does, we expect the NOSB will recommend changes to the National List with respect to flavors. (See Appendix F)

#### National Organic Standards Board Handling Committee

Sunset Recommendation – 2012

September 3, 2010

As the organic industry has evolved, there has been investment in developing organic alternatives for some individual flavors, or classes of flavors, within the category...
...For example, herbal extracts could very well be determined to be agricultural and could be

listed on §205.606. One could even envision when they would not need to be listed because they would be available as organic...

(See Appendix D)

#### NOP Policy Memo 11-1, Issued January 21, 2011 (Rev. 10/31/11)

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.

#### **Commercial Availability of Organic Flavors**

Even though organic certification of natural flavors is not required, many operators have voluntarily chosen certification because of the great demand by consumers. Below are the results of a survey of ACAs by The Accredited Certifiers Association, Inc. in 2011. (See Appendix A for an explanation of the following categories.)

3. Indica	te the nun	nber of natu	ıral flavors	s you certif	y under th	e following	g categories	<b>5</b> :
Natural Flavor 11 responses	Extracts 11 responses	Essential Oils 11 responses	Distillates 9 responses	Oleoresin 7 responses	Essence 9 responses	Powders 9 responses	Emulsions 8 responses	Other 7 responses
TOTAL	TOTAL	TOTAL	TOTAL	TOTAL	TOTAL	TOTAL	TOTAL	TOTAL
1978	964	1341	125	33	112	177	12	26

This survey also reported that 157 companies were being certified at the time. The actual number may be even higher.

A similar survey was sent in September 2014 with the following results:

3. Indica	3. Indicate the number of natural flavors you certify under the following categories:								
Natural Flavor (Compounded flavor) 5 responses	Natural Flavor (WONF) 7 responses	Extracts 6 responses	Essential Oils 5 responses	Distillates 4 responses	Oleoresin 5 responses	Essence 4 responses	Powders 5 responses	Emulsions 4 responses	Other 2 responses
TOTAL	TOTAL	TOTAL	TOTAL	TOTAL	TOTAL	TOTAL	TOTAL	TOTAL	TOTAL
2146	405	272	1645	4	18	33	254	19	0

This survey reported that 189 companies are being certified at this time, however, since there were fewer responses submitted than in the 2011 survey, this number may be significantly higher.

When Flavors were initially included on the National List, the number of flavor compounds comprising natural flavors was estimated number up to 100 or more. The data from the ACA surveys demonstrates that this number has grown substantially, not only for natural flavors in general, but for certified organic flavors.

#### 12. Petition Justification Statement

Natural flavors are allowed in certified organic (95%+) food products in the 5% non-organic portion, provided they are produced without synthetic solvents, synthetic carriers and artificial preservatives. As a general prohibition, they must also be produced without the use of genetic engineering and ionizing radiation. Natural flavors appear on the National List as a broad category listing, therefore many different natural forms are allowed. Examples include extracts, oleoresins, essential oils, compounded flavors, and distillates. Flavors were not added to the National List as a result of a petition. Instead, they were included among natural substances initially placed on the list when NOP promulgated regulations pursuant to the Organic Foods Production Act of 1990. Since the implementation of the organic regulations in 2002, many organic flavors have been developed and are being successfully used by many companies.

Since the 2011 OTA Task Force Recommendation, and despite no action on this recommendation by NOP or NOSB, the number of certified organic flavors currently in the marketplace has grown substantially. However the number of available certified organic flavors is not sufficient to meet the current needs of the marketplace, given the numerous and different

types and forms used by the organic sector. Currently, there is no requirement to use organic flavors; all use is voluntary at this time.

During the comment period for the 2012 Sunset Review of Natural Flavors, several comments were received that supported industry movement towards the use of organic flavors. One company stated that they use ONLY certified organic flavors in their products and at that time recommended an annotation change which only allows limited use of flavors (or constituents) that are not commercially available. Another commenter, a manufacturer of certified organic flavors, called attention to the widespread use of "NOP-compliant natural flavors" despite the breadth of certified organic flavors that are available, citing that as long as the current listing for natural flavors remains unchanged (where there is an immunity from commercial availability requirements), the result is a lack of motivation for the manufacturers of organic products to switch to organic flavors.

In order to further the use and development of organic flavors, OTA is submitting this petition to revise the current listing of Flavors to require organic flavors in products labeled "organic" when they are commercially available in the necessary quality, quantity or form. The proposed change is as follows (changes in red):

Flavors – Non-synthetic flavors may be used in products labeled as "organic" when organic flavors are not commercially available. All flavors must be derived from organic or non-synthetic sources only, and must not be produced using synthetic solvents and carrier systems or any artificial preservative.

Historically, commercial availability only applied to §205.606. However, moving Flavors from §205.605 to §205.606 would cause a significant disruption to the industry. First, the complexity of such a broad category listing makes it impractical to individually list flavors on the National List. This was acknowledged by the NOSB at both Sunset Reviews. Second, if Flavors as a broad category were moved to §205.606, then non-agricultural flavors would no longer be allowed according to the requirements for inclusion on §205.606: Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as "organic."

Flavors are both agricultural and non-agricultural and it would be extremely difficult to separate out the literally thousands of flavors into agricultural and non-agricultural categories. The OTA Flavor Task Force explored this option and concluded that it was not a reasonable or practical approach. Also, some non-agricultural flavors can be produced organically because they are derived from or produced using agricultural source material. Flavors produced via fermentation are a great example, and are analogous to yeast, which is used as a flavor as well and classified as non-agricultural. Several products of fermentation are classified as non-agricultural, yet they can be produced organically provided the agricultural source material is certified organic and all

other ingredients and processing aids meet the NOP product composition requirements for labeling a product "organic." Additionally, some Flavors are derived from agricultural material but the isolated flavor component is classified as non-agricultural according to the current NOP definition of non-agricultural. NOSB as well as accredited certification agents would have to make thousands of determinations about which flavors were agricultural and allowed. This would be a time-consuming and costly endeavor that, at this time, would be done without final guidance from NOP on how to make agricultural and non-agricultural determinations.

Furthermore, the NOSB on October 28, 2010 applied the concept of commercial availability to yeast, listed on \$205.605a, when used as a food or fermentation agent in products labeled as "organic." And on February 11, 2010, a petition was submitted to NOSB to remove silicon dioxide from \$205.605(b) because rice hulls can serve as an alternative. The final decision by the board on December 2, 2011 was to add an annotation for Silicon dioxide stating "Permitted as a defoamer. Allowed for other uses when organic rice hulls are not commercially available." In both these cases, the NOSB recognized that organic alternatives had been developed and were available for use although not sufficiently available. Through the decisions to extend the concept of commercial availability to non-agricultural nonsynthetic, as well as agricultural, materials, the NOSB has encouraged the organic sector to continuously increase its use of organic ingredients and to invest in the development of organic alternatives to other substances or ingredients used in organic handling operations.

OTA is requesting that the NOSB recognize the complexity of Flavors and apply the precedent set with yeast and silicon dioxide, and again encourage and support continuous improvement by mandating the use of organic flavors when commercially available while retaining the listing of Flavors on §205.605a.

#### 13. Confidential Business Information Statement

This petition contains no confidential business information.

### **Appendices**

Petition to amend the annotation to FLAVORS on the National List as a non-agricultural (non-organic) substance allowed in or on processed products labeled as "organic" or "made with organic (specified ingredients)," at §205.605(a)

Appendix A – Flavor Nomenclature

Appendix B – National Organic Standards Board

Final Recommendation

Addendum Number 14

The Use of Natural Flavors in Organic Foods

Date adopted: October 31, 1995

Appendix C – Overview of Flavor Additives

Prepared for the USDA National Organic Program and the National Organic

Standards Board

October 14, 2005

Appendix D – National Organic Standards Board Handling Committee

Sunset Recommendation – 2012

Flavors

September 3, 2010

<u>Appendix E</u> – Letter from the Organic Trade Association to National Organic Standards Board

RE: OTA Flavor Task Force: Use of Organic and Natural Flavors in NOP

**Certified Products** 

April 10, 2011

Appendix F – NOP Guidance for Certifiers on Flavors

February 16, 2007

<u>Appendix G</u> – Examples of Certified Organic Flavors

Appendix H – Example Labels (and Specification Sheets) for Certified Organic Flavors

#### Type of Flavor (Typically referred to as Flavor Nomenclature)

**Compounded Flavor**: A mixture of ingredients such as extracts, essential oils and natural isolates. In most cases, it's usually dissolved in a solvent or it would be too concentrated.

**Compounded WONF**: Combination of a compounded flavor and a natural flavor WONF (with other natural flavor).

**Distillate**: A clear, flavorful liquid produced from fruits, herbs, roots, etc., by distillation; also the condensed product separated by distillation.

**Extracts**: Extracts are products that use solvents (typically alcohol or alcohol-water mixture) to pull out certain volatile and non-volatile fractions from raw materials such as spices and herbs, cocoa and vanilla, or flowers. Extracts found on the grocer's shelf, such as orange, almond, lemon, etc. are essential oils dissolved in an alcohol-water mixture.

**Essential Oil**: A volatile oil. An essential oil is what gives a botanical its aroma and can be the aromatic essence of a spice, flower, root, leaf or peel. It's made by steam distillation or cold pressing.

**Essential Oil Isolate**: Isolate of an essential oil – see above.

**Isolate**: A chemical or fraction obtained from a natural substance. For example, citral can be isolated from lemon oil or lemongrass.

**Oleoresin**: Solvent extracts of spices where the solvent has been completely removed. An oleoresin will contain the essential oil plus other important non-volatile components that characterize the flavor, color and other aspects of the starting raw material. For example, the oleoresin of pepper will contain its aroma as well as its taste sensations of heat and spice.

**Single flavor chemical:** A single molecule that provides flavor. These can be naturally or artificially derived, but they are specified to have a greater than 95% purity.

Others – could include:

**Add-Back Flavor** - Adds back flavor lost during processing. For instance, orange juice can lose much of its flavor during the concentration process but flavorists can add orange oil during the formulation to increase the flavor. Add-back flavors imply that all ingredients of the flavors are derived from the named fruit.

**Essence**: Concentrated fragrance or flavorant. In some countries, essence is used to designate volatile oils, but in the U.S. this term is commonly applied to alcoholic solutions of volatile oils.

**Natural Flavor WONF** – A natural flavor that contains both a characterizing flavor from the named material and other natural flavor, which simulates, resembles or reinforces the characterizing flavor.

Single-fold Oil: The oil as it is produced from the plant (distillation or expression), without concentration.

#### References

George A. Burdock. Fenaroli's Handbook of Flavor Ingredients, 5<sup>th</sup> ed. Washington D.C. CRC Press.

Primo Bader and Steve Phelps. January-March 2007. The Flavor Factor: Exploring Today's Taste-Improving Technology. *Organic Processing Magazine*.

National List Recommendations -- 1995

#### NATIONAL ORGANIC STANDARDS BOARD FINAL RECOMMENDATION ADDENDUM NUMBER 14 THE USE OF NATURAL FLAVORS IN ORGANIC FOODS

Date adopted: October 31, 1995

Location: Austin, Texas

#### Introduction:

The Committee has debated the issue of the use of natural flavors as ingredients in organic foods. The focus of the debate has been whether natural flavors, with certain constraints, are appropriate for use in "organic foods" (95%-100% organic ingredients) or whether natural flavors should be restricted to use in foods "made with organic ingredients" (50%-95% organic ingredients) only.

Natural flavors are materials which are comprised of flavor compounds derived from natural (non-synthetic) bases (typically botanicals such as herbs, spices, fruits or compounds derived from fermentation), a carrier (ethanol, propylene glycol, etc.), and agents which help preserve the natural flavors (glycerin, acetic acid, etc.). The natural constituents included in the natural flavor are extracted using a number of natural and synthetic solvents. The solvents may be alcohols, ethyl acetate, hexane or acetone and are chosen based on their physical and chemical properties and their ability to extract the desired natural constituent. The solvents are removed by evaporation with the final flavor compounds including trace amounts of the solvents (typically <10ppm). The number of flavor compounds comprising natural flavors vary, but may number up to 100 or more.

Natural flavors are used in very small amounts (approximately .05-.40%) to boost the flavor profile in products which, because of functional or economic necessity, require less than optimal amount of foodstuff necessary to give the finished products the required flavor profile. They are widely used in dairy products, baked goods, and juice products, as well as in other foods.

#### **Recommendation:**

Upon implementation, all manufacturers will be required to have certification from the producers of the natural flavors that,

For "organic foods" (95%-100% organic ingredients):

1) All of the flavor constituents used in the natural flavor are from natural sources and have not been chemically modified in a way which makes them different than their natural chemical state.

2) The natural flavor has not been produced using any synthetic solvent and carrier systems or any artificial preservatives.

For "foods made with organic ingredients" (50%-95% organic ingredients):

- 1) All of the flavor constituents used in the natural flavor are from natural sources and have not been chemically modified in a way which makes them different than their natural chemical state.
- 2) The natural flavor does not contain propylene glycol, any artificial preservatives, and is not extracted with hexane.

Additionally, manufacturers shall provide written documentation in their Organic Handling Plan showing efforts made toward the ultimate production of an organic natural flavor as listed in the stepwise progression below:

Natural flavor constituents and non-synthetic carrier base and preservative agents (ex. grain ethanol, non-synthetic glycerin and non-synthetic acetic acid).

Organic flavor constituents, organic carrier base, and organic preservative agents.

Organic flavor constituents extracted using organically produced solvents, organic carrier base, and organic preservative agents.

# OVERVIEW OF FLAVOR ADDITIVES Prepared for the USDA National Organic Program and the National Organic Standards Board October 14, 2005

This paper provides a general characterization of flavor additives, including an overview of how they are regulated within the United States and how they are currently used in organic food production.

#### I. EXECUTIVE SUMMARY

Flavors are volatile organic chemicals. Most have simple, well-characterized structures with a single functional group (i.e., a chemically reactive subunit) and a low molecular weight. Flavors can be categorized as artificial flavors, spices, and natural flavors. Flavors are regulated by the Food and Drug Administration (FDA) in the United States and are either "generally recognized as safe" (GRAS) substances or food additives, which need to be approved by FDA. Manufacturers that produce flavors that are considered food additives must submit petitions to FDA containing specific information so that the favors can be evaluated for safety when consumed by humans. Although FDA regulates whether flavors are safe for human consumption, they are also of interest to other governmental bodies. Currently, the USDA and the National Organic Standards Board (NOSB) are evaluating the use of natural flavors in organic foods or foods made with organic ingredients.

#### II. CHARACTERIZATION

Approximately 2,500 chemically defined flavoring substances are in use in either Europe or the United States (Munro et al., 1999). These substances are all volatile organic chemicals, and most have simple, well-characterized structures with a single functional group (e.g., alcohol, ketone) and a low molecular weight (<300 g/mol). Aliphatic acyclic and acyclic alcohols, aldehydes, ketones, carboxylic acids and related esters, lactones, ketals, and acetals comprise more than 700 of the 1,323 chemically defined flavoring substances in the United States. Additional structural categories include aromatic, heteroaromatic, and heterocyclic substances with characteristic organoleptic properties (Munro et al., 1999).

Flavors can further be characterized as artificial flavors, spices, or natural flavors. According to FDA (21 CFR Part 101), artificial flavors, spices, or natural flavors are defined as follows:

**Artificial Flavor or Artificial Flavoring:** "...any substance, the function of which is to impart flavor, which is not derived from a spice, fruit or fruit juice, vegetable or vegetable juice, edible yeast, herb, bark, bud, root, leaf or similar plant material, meat, fish, poultry, eggs, dairy products, or fermentation products thererof."

 Specific artificial flavors are listed in 21 CFR Parts 172.515 and 182.60.

**Spice:** "...any aromatic vegetable substance in the whole, broken, or ground form, except for those substances which have been traditionally regarded as foods, such as onions, garlic, and celery; whose significant function in food is seasoning rather than nutritional; that is true to name; and from which no portion of any volatile oil or other flavoring principle has been removed."

Specific spices are listed in 21 CFR Parts 182.10 and 184.

**Natural Flavor**: "...the essential oil, oleoresin, essence or extractive, protein hydrolystate, 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 of 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 21 CFR Parts 182.10, 182.20, and 182.40, as well as those listed in Parts 184 and 172.50.

 According to a study by Munro et al. (1998), human exposure to flavors is generally low in the United States. Exposure levels estimated by Munro et al. (1988) are shown in Table 1. These estimates were made with the following assumptions: (1) survey poundage reflects 60 percent of actual use, (2) 10 percent of the population is exposed, and (3) the U.S. population in 1987 was 240 million.

Table 1: Human Exposure to Flavor Ingredients <sup>a</sup> (Munro et al., 1998)

Intake (µg per day) <sup>b</sup>	Number of Flavors	<b>Cumulative Frequency (%)</b>
< 0.01	349	26
0.01-0.1	93	33
0.1-1	274	54
1-10	224	71
10-100	204	86
100-1000	111	95
1000-10,000	45	98
10,000-100,000	16	99
>100,000	7	100
Total	1,323	100

a Chemically defined flavoring substances permitted for use in the U.S., excluding botanicals.

#### III. REGULATION

Currently in the United States, flavors are regulated by FDA under authority of the Food Additives and Amendment Act (FAA) of 1958. Under the FAA, FDA is responsible for ensuring the safety of new food additives, including flavors, before they are used in food

b Intake ( $\mu$ g/person/day) = ([annual flavor usage in  $\mu$ g/0.6]/24) X 10<sup>6</sup> persons X 365 days

products. In the existing regulatory system, all flavors are either GRAS ("generally recognized as safe") substances or flavor additives that must be approved for use by FDA.

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#### **GRAS Flavors** Α.

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In response to the FAA, the Flavor and Extract Manufacturers Association of the United States (FEMA) was formed, and the GRAS assessment program was initiated. This assessment program was created because the lengthy new food additive application process was considered unnecessary for the large number of substances with a long history of widespread and apparently safe use. Food Additive Petitions and approval by FDA (see Section III. B.) are not required for GRAS substances.

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FEMA consists of a panel of independent experts who are responsible for establishing procedures that help decide whether a flavor qualifies as a GRAS substance and applying these procedures to the safety evaluation of flavor materials being used in the United States. In order to qualify as a GRAS substance, a flavor must meet the following four requirements (Hallagan and Hall, 1995):

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1. Safety must be generally recognized by experts.

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2. Experts must be qualified by scientific training and experience in evaluating safety.

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3. Experts must base their decisions on scientific procedures or through experience based on common use in food if used in food prior to 1958.

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4. Determination of a GRAS substance must be based, in part, on the intended conditions of use of the flavoring substance through the calculation of a possible average daily intake and a *per capita* exposure estimate.

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To date, there are more than 2,000 materials judged to be GRAS substances by FEMA (Adams and Smith, 2004).

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- FDA recognizes the work of FEMA and incorporates information provided by the expert panel on the safety of flavoring substances into FDA's flavor database. Additionally, in 1976, FDA recognized the FEMA GRAS lists when giving their opinion on bulk labeling of flavors and in other direct ways (Hallagan and Hall, 1995). Currently, FDA's safety requirements for GRAS substances largely depend on the flavor's historical profile. Affirmation of GRAS status is often based on the common use of the substance in foods prior to 1958 coupled with the lack of known or documented adverse effects. This
- 41
- 42 statement is supported by Section 170.30 of the CFR. Those substances with no
- 43 documented history prior to 1958 may still qualify as a GRAS substance by FDA; 44 however, the quantity and quality of scientific evidence required is the same as that for a
- 45 food additive petition. Affirmed GRAS substances that are to be used in new ways or at
- different concentrations also must have their status re-evaluated by FDA. Like FEMA, 46

FDA affirms GRAS substances by using an expert advisory panel that reviews the scientific data. Substances lacking strong scientific evidence may be deemed a food additive and subjected to a food additive petition.

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#### B. Flavors Regulated as Food Additives

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If a flavor does not qualify as a GRAS substance, a food additive petition must be filed by the petitioner and approved by FDA. In filing for a food additive approval, the petitioner is responsible for providing FDA with information including, but not limited to the following:

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- Identification of the food additive;
- Physical, chemical, and biological properties;
- Chemical specifications;
- Manufacturing process description;
- Stability data;
- Intended uses and restrictions;
- Labeling<sup>1</sup>;
- Tolerances limitations<sup>2</sup>;
  - Analytical methods for enforcing chemical specifications;
  - Safety studies; and
  - Estimate of probable exposure.

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A full description of the information to be submitted in a food additive petition is available in 21 CFR Part 571.

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A food additive petition must show that the proposed additive performs as it is intended and that it would not cause harmful effects at expected levels of human consumption. FDA is responsible for evaluating food additive petitions and determining whether food additives are safe for human consumption. Generally, this determination is made by examining the following factors:

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- History of use or natural occurrence;
- Consumption ratio (i.e., the comparison of natural occurrence to intentional addition), if applicable;
- Exposure levels;
- Inherent toxicity of the substance;
- Toxicological data on the substance or on structurally-related compounds; and
- Metabolism of the substance (either know of forecasted on the basis of data for structurally-related compounds).

<sup>&</sup>lt;sup>1</sup> Any labeling that will be required by applicable provisions of the Federal Food, Drug, and Cosmetic Act on the finished food by reason of the use of the food additive.

<sup>&</sup>lt;sup>2</sup> According to 21 CFR Part 571, "If the food additive is one for which a tolerance limitation is required to assure its safety, the level of use proposed should be no higher than the amount reasonably required to accomplish the intended physical or other technical effect, even though the safety data may support a higher tolerance."

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FDA's assessment includes a review toxicity data such the results of controlled animal studies. Ideally, a complete range of data, including short- and long-term toxicity studies, as well as studies that examine possible reproductive, carcinogenic, mutagenic, and sensitization characteristics of the flavoring substance would be available for review. Sometimes a complete set of toxicology data is not available. One method of gaining additional insight on a flavor lacking a complete set of data is to evaluate the toxicity of structurally related substances. By evaluating structurally related substances, scientists can try to determine how the compound is absorbed, distributed, and metabolized within the study, and how it may act on target organs in the body. Based on these data and various safety factors, FDA determines a safe exposure level for the color additive.

FDA then compares the safe exposure level to the amount likely to be consumed in food taking into consideration the composition and properties of the substance and the proposed conditions of use. Because the absolute safety of any substance can never be proven, FDA must determine if the additive is safe under the proposed conditions of use, based on the best scientific knowledge available. For more information, see <a href="http://vm.cfsan.fda.gov/~dms/opa-cg8e.html">http://vm.cfsan.fda.gov/~dms/opa-cg8e.html</a>.

#### IV. NON-REGULATORY TOOLS

Cramer et al. (1978) created a decision-tree approach that is used by some agencies to determine which favoring substances are safe for use in food. Documentation could not be found as to whether FDA uses this decision tree approach; however, the information presented by Cramer et al. (1978) is relevant to the understanding of how a flavor could be judged as safe for human consumption. Although it is not implicitly stated that FEMA uses this decision tree, it is included on the FEMA web site. Additionally, a modified version of this decision tree is used by the Joint FAO/WHO Expert Committee on Food Additive (JECFA), an international expert scientific committee that is administered jointly by the Food and Agriculture Organization of the United Nations (FAO) and the World Health Organization (WHO). Another modified version of the decision-tree created by Cramer et al. (1978) is listed below, in which flavoring substances are considered safe for their intended use if one of the five numbered decision criteria outlined below is met (Munro et al., 1999).

- 1a. The favoring substance has a simple structure and is predicted to be metabolized into innocuous products; and
- 1b. The conditions of intended use do not result in an intake greater than the human exposure threshold for the relevant structural class, indicating a low probability of potential for adverse effects.

2a. The conditions of intended use result in an exposure greater than the human exposure threshold for the relevant structural class; however,

<sup>&</sup>lt;sup>3</sup> The decision tree may be found under the topic of "growth and development and accomplishments" at <a href="http://www.femaflavor.org/html/public/general">http://www.femaflavor.org/html/public/general</a> info.html.

1 2b. The favoring substance has a simple structure and is predicted to be metabolized into innocuous products, and it or its metabolites are endogenous human metabolites with no know biochemical regulating function.

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- 5 3a. The favoring substance has a simple structure and is predicted to be metabolized into innocuous products; and
- 7 3b. The conditions of intended use result in an exposure greater than the human exposure threshold for the relevant structural class; however,
- 9 3c. There are toxicity data establishing safety under conditions of intended use, or there are toxicity data on 1 or more structurally-related chemicals which provide a NOEL high enough to accommodate any perceived difference.

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- 13 4a. The metabolic fate of the flavoring substance cannot be confidently predicted on the basis of the structure; however,
- 15 4b. The conditions of intended use result in an exposure below the human exposure threshold for the relevant structural class, indicating a low probability of potential adverse effects; and
- 18 4c. There are toxicity data establishing safety under conditions of intended use, or 19 there are toxicity data on 1 or more structurally-related chemicals which provide a 20 NOEL high enough to accommodate any perceived difference.

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- 22 5a. The metabolic fate of the flavoring substance cannot be confidently predicted on the basis of the structure; however,
  - 5b. The conditions of intended use result in an intake below the human exposure threshold of  $1.5 \,\mu\text{g/day}^4$ , providing assurance that the substance will be safe under conditions of intended use.

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#### IV. USE OF FLAVORS IN ORGANIC FOODS

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- Flavors are currently on the National List of Allowed and Prohibited Substances for use in organic foods. Flavors were not added to the National List as the result of a petition.
- 32 Instead, they were included among substances initially placed on the National List when
- 33 USDA promulgated regulations pursuant to the Organic Food Production Act of 1990.
- 34 According to 21 CFR Part 205.605, nonagricultural (nonorganic) flavors are allowed as
- ingredients in or on processed food products labeled as "organic" or "made with
- organic." Only nonsynthetic flavors (as a group) are listed.

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- 38 The NOSB has debated the issue of using natural flavors as ingredients in organic foods.
- Recommendations by the NOSB state that, for organic food (i.e., 95-100 percent organic
- 40 ingredients), all flavor constituents of the natural flavor must be from natural sources that
- 41 have not been chemically modified in a way that makes them different from their natural

 $<sup>^4</sup>$  FDA established a human exposure threshold value for an untested chemical present in food. This value is the intake level below which no risk to public health would be likely to occur (i.e., the human exposure threshold value will present less than a  $10^{\text{-}6}$  risk). Currently, the human exposure threshold is 1.5  $\mu\text{g}/\text{day}$  and is based on the assumption that an individual consumes 1,500 g of solid food and 1,500 g of liquid food per day (Federal Register, 1995).

state. Additionally, the natural flavor cannot be produced using any synthetic solvent and carrier systems or any artificial preservatives. For foods made with organic ingredients (i.e., 50-95 percent organic ingredients), all of the flavor constituents used in the natural flavor must be from natural sources that have not been chemically modified in such a way that makes them different from their natural chemical state. Additionally, the following conditions must be satisfied:

• The natural flavor does not contain propylene glycol, any artificial preservative, and is not extracted with hexane.

• Manufacturers must provide written documentation in their Organic Handling Plan, which shows that efforts were made toward the ultimate production of an organic natural flavor as listed in the stepwise progression below:

Natural flavor constituents and non-synthetic carrier base and preservative agents

Organic flavor constituents, organic carrier base, and organic preservative agents

 Organ flavor constituents extracted using organically produced solvent organic carrier base, and organic preservative agents.

#### **References:**

Adams, T.B., and Smith, R.L. (2004) Issues and challenges in the safety evaluation of food flavors. Toxicology Letters 149:209-213.

Cramer, G.M., Ford, R.A., and Hall, R.L. (1978) Estimation of toxic hazard- a decision tree approach. Food and Chemical Toxicology 16:255-276.

Federal Register (1995) Food additives: Threshold of regulation for substances in food-contact articles (Final Rule). Federal Register 60(136):52719-52729.

Hallagan, J.B., and Hall, R.L. (1995) FEMA GRAS- A GRAS assessment program for
 flavor ingredients. Regulatory Toxicology and Pharmacology 21:422-430.

Munro I.C., Shubik P., and Hall R. (1998) Principles for the safety evaluation of flavouring substances. Food and Chemical Toxicology 36:29-540.

Munro I.C., Kennepohl E., and Kroes R. (1999) A procedure for the safety evaluation of flavouring substances. Food and Chemical Toxicology 37:07-232.

- Shrankel K.R. and Bolen. P.L. (2000) Safety assessment of flavor ingredients. In: Watson
- 45 D.H. (ed.). Food Chemical Safety. Volume 2. Woodhead Publishing Limited: Cambridge,
- 46 England. Pp. 207-227.

#### National Organic Standards Board Handling Committee Sunset Recommendation – 2012 Flavors

#### September 3, 2010

List: 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))."

(a) Nonsynthetics allowed

#### **Committee Summary:**

Federal register notice of the sunset of these materials elicited no public comments against relisting.

Review of the original recommendations, historical documents, and public comments does not reveal unacceptable risks to the environment, human, or animal health as a result of the use or manufacture of these materials. There is no new information contradicting the original recommendation which were the basis for the previous NOSB decisions to list these materials.

The Handling Committee recognizes that the category of flavors is broad, including everything from simple herbal extracts to complex compound flavors. As the organic industry has evolved, there has been investment in developing organic alternatives for some individual flavors, or classes of flavors, within the category. Because "Flavors" as a large category is listed on 205.605(a), commercial availability does not apply and there is no requirement that the organic alternatives that have been developed be used when available. The NOSB acknowledged this conundrum when Flavors was reviewed for sunset relisting in 2007. The complexity of the category and proprietary nature of most flavor formulas and processes was such that the board did not feel that it was practical to individually list flavors on the National List, so chose to relist the category as a single listing. That is still true today.

The Handling Committee does believe that there is a possibility of dividing the flavor category into rational subparts which could then be listed on the appropriate section of the National List. For example, herbal extracts could very well be determined to be agricultural and could be listed on §205.606. One could even envision when they would not need to be listed because they would be available as organic. The rational division of the flavor category and the appropriate way to list these flavor classes, or not list certain classes, requires specific knowledge and expertise which the Handling Committee felt went beyond the scope of a Technical Review.

In order to avoid unnecessary disruption to industry, we are recommending relisting of Flavors on §205.605(a), but we are also communicating our belief that the full category should not be relisted in five years when next reviewed for sunset. Instead, we recommending that the NOSB, in consultation with the National Organic Program, establish a Flavors Task Force. The Flavors Task Force would be asked to develop a recommendation to appropriately divide

Appendix D

flavors into rational subparts, or classes, composed of flavors which shared similar sources and processes. The recommendation would include whether the class was compatible with organic production, how the sub-part should be classified on the National List, and would petition for listing of the class, if necessary, on the National List. We expect that this work could be done prior to the next sunset review for flavors.

#### Committee Recommendation(s):

The handling committee recommends the renewal of the following substances in this use category as published in the final rule:

Flavors, non-synthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative.

#### **Committee Vote:**

Motion: Katrina Heinze Second: Steve DeMuri Yes: 6 No: 0 Abstain: 0 Absent: 1 April 10th, 2011

Ms. Patricia Atkins National Organic Standards Board USDA-AMS-NOP 1400 Independence Avenue, SW Room 2646-So, Ag Stop 0268 Washington, DC 20250-0268

Docket: AMS-NOP-11-0014

#### RE: OTA Flavor Task Force: Use of Organic and Natural Flavors in NOP Certified Products

Dear Ms. Atkins:

Thanks for the opportunity to submit OTA Flavor Task Force Comments and Recommendation for consideration at the April 2011 National Organic Standards Board Meeting (NOSB).

The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. Its members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's Board of Directors is democratically elected by its members, and its mission is to promote and protect the growth of organic trade to benefit the environment, farmers, the public and the economy (<a href="http://www.ota.com/">http://www.ota.com/</a>).

The OTA Flavor Task Force Recommendation is not in response to an agenda item for the Spring 2011 meeting. Instead we are providing our support in response to the NOSB's request for the formation of a task force on flavors.

#### **Background on the Formation of the Flavor Task Force**

The National Organic Standards Board (NOSB) at the October 2010 meeting recommended the formation of a task force on flavors. The NOP responded to their request in the December 17, 2010 Response Memorandum. The National Organic Program (NOP) responded with the following:

**Flavor Task Force**: The NOP concurs with the need for a more extensive review of the category of flavors currently listed on the § 205.605(a)<sup>1</sup> to determine if there are flavors that should be considered agricultural and required to be organically produced. The NOP does not believe there is a need for an NOP sponsored task force on flavors at this time. The NOP believes the formation of an informal industry group to develop a flavor recommendation for the NOSB to consider would accomplish the goal more effectively.

 $<sup>^1</sup>$  Nonagricultural (nonsynthetic) substances allowed in or on "organic" or "made with (specified organic ingredients or food group(s))"

In response to the NOP and to the need for an informal industry task force, OTA invited interested parties to join such a group. The OTA Flavor Task Force is comprised of 12 members and has been meeting once a week since February 18<sup>th</sup>, 2011. We have completed our first round of work accomplishing our first recommendation.

#### **Objectives of the OTA Flavor Task Force**

- To review the category of flavors currently listed on the § 205.605(a) to determine if there are natural flavors that should be considered agricultural and required to be organically produced.
  - o Identify the sub-categories within the larger category of Flavors, non-synthetic that are agricultural.
    - Agricultural product. Any agricultural commodity or product, whether raw or processed, including any commodity or product derived from livestock, that is marketed in the United States for human or livestock consumption.
  - Submit to NOSB/NOP a report recognizing that certain categories of Flavors, nonsynthetic are clearly agricultural and thus subject to organic certification and/or listing on § 205.606<sup>2</sup>.

#### **Summary Recommendation**

- o No rule change to current listing of Flavors, non-synthetic on § 205.605(a);
- o NOSB to recommend guidance to the NOP on the types of flavors that are agricultural;
- Agricultural flavors in organic products must be listed on § 205.606 and subject to commercial availability.

#### The Problem

The NOP clarified in 2007 that flavors meeting the FDA definition of "Natural Flavor" are allowed as nonagricultural, nonsynthetic ingredients under 205.605(a) of the National List.

The category of Natural Flavors as defined in 21CFR § 101.22 is an extremely broad group of products.

## § 101.22 Foods; labeling of spices, flavorings, colorings and chemical preservatives,

(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

 $<sup>^2</sup>$  Nonorganic agricultural ingredients allowed in "organic" products when not commercially available in organic form

than nutritional. **Natural flavors** include the natural essence or extractives obtained from plants listed in §§ 182.10, 182.20, 182.40, 182.50, and part 184 of this chapter, and the substances listed in § 172.510 of this chapter.

It is clear from the above CFR definition that this includes every kind of flavor from squeezing orange oil out of an organic Orange peel, to flavors that are the product of genetically modified organisms followed by processes that change the molecular structure of the flavor. Obviously the latter cannot be used in Organic foods under any circumstances and the first example can very clearly be envisioned as agricultural and achievable as organic certified Orange oil.

As a result, the spectrum of the CFR definition ranges from:

- Obviously agricultural and easily certified, to;
- Obviously not agricultural and not only not certifiable but also not usable in organic food under any circumstances;
- And includes everything on the spectrum in between.

#### **NOP Regulatory Reference**

§ 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))."

The following nonagricultural substances may be used as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))" only in accordance with any restrictions specified in this section.

#### (a) Nonsynthetics allowed:

Flavors, nonsynthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative.

The guidance that the NOP § 205.605 listing applies to anything that meets the definition of a Natural Flavor in the CFRs means that if a flavor meets the definition of 'Natural Flavor', the rules of the National List section § 205.605 apply, and commercial availability cannot be enforced. Even though the certification of natural flavors is not required, many operators have voluntary chosen certification because of the great demand by consumers. Below are the results of a survey of ACAs by The Accredited Certifiers Association, Inc.

3. Indica	3. Indicate the number of flavors you certify under the following categories:							
Natural Flavor 11responses	Extracts (11 responses)	Essential Oils (11 responses)	Distillates (9 responses)	Oleoresin (7 responses)	Essence (9 responses)	Powders (9 responses)	Emulsions (8 responses)	Other (7 responses)
TOTAL	TOTAL	TOTAL	TOTAL	TOTAL	TOTAL	TOTAL	TOTAL	TOTAL
1978	964	1341	125	33	112	177	12	26

This survey also reported that 157 companies are currently being certified. The actual number may be even higher.

The significant number of certified flavors supports the NOP's 2010 request for guidance on this topic, as the situation has changed significantly since the NOP's 2007 guidance which stated that any flavor whether agricultural or not, whether certified or not, would be handled according to § 205.605 (a). Since then so many flavors have been identified as certifiable, interest has grown in having the clearly agricultural flavors be subject to the same organic rules as other agricultural products. The flavor categories underlined on the chart above are flavors that the committee has identified as being clearly agricultural. As such, they should be treated as any other agricultural product is treated under the NOP; they must be organic to be used in an organic product or on § 205.606 and subject to commercial availability.

It is important to note here that the Task Force has not tried to provide the ultimate definition of an agricultural flavor. Our goal was to identify those flavors that are agricultural with little room for debate about whether they should be subject to organic certification or at least commercial availability criteria if listed on § 205.606. An additional goal is then to get these clearly agricultural categories of natural flavors subject to the same organic requirements as all other agricultural products, and to do so as quickly as possible without disrupting the important and growing organic marketplace.

This process will take time because there are still many of these types of flavors within these flavor categories that are not currently commercially available as organic. The process of effecting this transition must provide sufficient time for versions of these flavors to be identified and petitioned on to § 205.606 without the severe disruption to the Organic marketplace that might occur if producers suddenly lost access to agricultural flavors that are not yet commercially available in organic form.

#### Recommendation

- No rule change to current listing of Flavors, non-synthetic on § 205.605a.
- NOSB to recommend guidance to the NOP on the types of natural flavors that are agricultural:
  - Extracts, Distillates, Essential Oils, Essential Oil Distillate, Oleoresin, Essence, Oils
     Single and multiple fold
    - These are derived from botanical material or fermentation and may be produced using solvents.
- Agricultural flavors must be organic, with the exception that non-organic agricultural flavors can be used in organic products if listed on § 205.606 and commercially unavailable in organic form.
- NOP to provide a phase-in-period to allow types of agricultural flavors that are not yet commercially available as "organic" to be petitioned onto §205.606.

#### **Next Steps**

- Considering possible wording changes to the Flavors listing and annotation in § 205.605.
- Review current and anticipated industry practices.
- Follow up with presentation of progress to the fall NOSB meeting.

• Develop training for ACA's on the use of flavors in organic products and terminology associated with those flavors.

Respectfully submitted on behalf of the OTA Flavor Task Force,

Gwendolyn Wyard

Associate Director of Organic Standards and Industry Outreach

Organic Trade Association

Hurndolyn V. liyank

CC: Laura Batcha

Chief of Policy and External Relations

Organic Trade Association

#### **OTA Flavor Task Force Members**

Gwendolyn Wyard – Co-Chair (OTA)

Julie Weisman – Co-Chair (Elan / Flavorganics)

Kim Dietz – Secretary (Smucker Natural Foods, Inc.)

David Adams – Savoury Systems

John Ashby – California Natural Products

Zareb Herman – The Hain-Celestial Group

Tony Moore – Flavor Producers Inc.

Joe Smillie – Quality Assurance International

Herb Stein – Natural Flavors Inc.

Victoria Alvarez Saavedra – Virginia Dare / Flavor Extract Manufactures Association (FEMA)

Sheila Linderman - Sheila Linderman Consulting

Mac Stone – NOSB Handling Committee Representative

#### **References (Attached):**

- Flavor Classification Chart
- National Organic Standards Board Final Recommendation Addendum Number 14 The use of Natural Flavors in Organic Foods. Date adopted: October 31, 1995
- Overview of Flavor Additives: Prepared for the USDA NOP & the NOSB 10/14/2005
- NOP Guidance for Certifiers on Flavors, February 16, 2007
- NOP Policy Memorandum Use of Natural Flavors 1/21/2011

#### NOP Guidance for Certifiers on Flavors February 16, 2007

In mid January the National Organic Program (NOP) sent out a statement to all Accredited Certifying Agents (ACAs) to clarify a question about flavors because the NOP was receiving a number of questions...whether or not flavors had to be certified organic and if not, petitioned to be placed on 205.606 if they are agricultural but not commercially available in organic supply. We thought this January 11<sup>th</sup> statement would help clear up some confusion, but like a lot of things in the NOP, apparently it didn't help sufficiently. And maybe for some folks it made things a bit more confusing. So let's try this again.

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

Natural flavors are used in very small amounts (approximately .05 to .40 percent) to boost the flavor profile in products which, because of functional or economic necessity, contain less than optimal amount of foodstuff necessary to give the finished products the required 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 and that's where they are – as natural, nonagricultural, nonsynthetic substances on 205.605(a).

Flavors are also defined according to the Food and Drug Administration (FDA) and for our purposes what is important here is the purpose of a flavor as described by FDA – namely that a flavor does not provide any nutritional or caloric purpose in the final product. Flavors do not need to be petitioned to be placed on 205.606 as long as they meet the definition of a flavor, according to FDA, and they are from nonsynthetic sources and are not produced using synthetic solvents and carrier systems or any artificial preservatives.

We recognize that there are some ACAs certifying flavors...which contradicts the National List...if we have flavors listed as non-agricultural, non-synthetic, how can we at the same time be saying there are flavors out there able to meet NOP standards, eligible for certification? Well, we live in an imperfect world...and actually that is how markets grow and develop. Over time, there may be more sources of organic flavors...we hope that there will be; in fact, the NOSB anticipated that this would occur when they drafted their recommendation in 1995, over a decade ago. However, these flavors are more simplistic and may not deliver complex flavor profiles demanded by consumers. As technologies emerge, this might change. If it does, we expect the NOSB will recommend changes to the National List with respect to flavors. Until then, well, we live with the imperfect market we have. Flavors – non-synthetic, natural (non-agricultural), are on the National List and do not need to be petitioned as long as they meet the existing definitions.



#### **Certification Acknowledgement**

This is to certify that

Elan, Inc.
268 Doremus Avenue
Newark, NJ 07105
United States

is Certified Organic by Oregon Tilth under the US National Organic Program 7 CFR Part 205

Scope: NOP-Handling

Client Identification Number: OT-002911

Certified Organic Products: Per attached System Plan Summary

Certified by OTCO since: 01/14/1997

NOP effective date: 04/29/2002

**Anniversary Date:** 01/01/2015

Once certified, a production or handling operation's organic certification continues in effect until surrendered, suspended or revoked.

Certificate Issue Date: 07/30/2014

Authorized by:

Connie Karr, Certification Director

Certificate Number: Z-10523-2008

Doc - Certificate | Rev. 5/8/2014

Oregon Tilth, Inc.

2525 SE 3rd Street, Corvallis, OR 97333, USA • PH: 1-503-378-0690 • FX: 1-541-753-4924 • www.tilth.org • organic@tilth.org



#### **Certification Acknowledgement**

This is to certify that

Elan, Inc.

268 Doremus Avenue

Newark, NJ 07105 United States

is declared by Oregon Tilth to be in compliance with the following standards / programs:

Standard / Program

**Certification Period** 

ACB EU Equivalent-Handling

01/01/2014 - 01/01/2015

US/Canada Equivalence-Handling

Compliant Since: 07/07/2011



This document has been issued on the basis of Article 29(1) of Regulation (EC) No 834/2007 and of Regulation (EC) No 889/2008. The declared operator has submitted his activities under control, and meets the requirements laid down in the named Regulations.

Date of last inspection:

04/10/2014

EU Code No.: US-ORG-042

Client Identification Number: OT-002911

Certificate Issue Date: 07/30/2014

Certified by OTCO since: 1/14/1997

Authorized by:

Jam 1 Kin

Connie Karr, Certification Director

Certificate Number: Z-10523-2008 Doc - Certificate | Rev. 5/8/2014

Oregon Tilth, Inc.

2525 SE 3rd Street, Corvallis, OR 97333, USA • PH: 1-503-378-0690 • FX: 1-541-753-4924 • www.tilth.org • organic@tilth.org



## **Organic System Plan Summary**

Elan, Inc. 268 Doremus Avenue Newark, NJ 07105 United States Client Identification Number: OT-002911

Certificate Issue Date: 07/30/2014

Certified by OTCO since: 1/14/1997

Certified Product (Organic)				
Product	Compliance			
Flavors/Colors:				
Extracts > Lemon Extract	NOP-Handling, ACB EU			
Organic Lemon Extract	Equivalent-Handling			
Extracts > Vanilla Extract	NOP-Handling, ACB EU			
	Equivalent-Handling, US/Canada			
	Equivalence-Handling			
Flavors > Raspberry Flavor	NOP-Handling, ACB EU			
Organic Raspberry Flavor	Equivalent-Handling			
Flavors > Vanilla Flavor	NOP-Handling, ACB EU			
	Equivalent-Handling			
Flavors > Vanilla Flavor	NOP-Handling, ACB EU			
Vanilla Concentrate	Equivalent-Handling			
Flavors > Vanilla Flavor	NOP-Handling, ACB EU			
Vanilla Concentrated Flavors	Equivalent-Handling			
Herbs/Spices/Seasonings:				
Herbs/Spices > Vanilla Bean	NOP-Handling, ACB EU			
•	Equivalent-Handling, US/Canada			
	Equivalence-Handling			
Herbs/Spices > Vanilla Bean	NOP-Handling, ACB EU			
Cuts Exhausted	Equivalent-Handling, US/Canada			
	Equivalence-Handling			
Herbs/Spices > Vanilla Bean	NOP-Handling, ACB EU			
Specks	Equivalent-Handling, US/Canada			
	Equivalence-Handling			
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#### Appendix G

#### Oils/Oleoresins:

Oils > Lemon Oil	NOP-Handling, ACB EU
Organic Lemon Oil	Equivalent-Handling
Various:	
Processed Vegetable Oils > Ethyl	NOP-Handling
_Palmate	
Processed Vegetable Oils > Glycerin	NOP-Handling, ACB EU
	Equivalent-Handling

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#### **Certification Acknowledgement**

This is to certify that

Flavorganics, LLC 268 Doremus Avenue Newark, NJ 07105 United States

is Certified Organic by Oregon Tilth under the US National Organic Program 7 CFR Part 205

Scope: NOP-Handling

Client Identification Number: OT-003274

Certified Organic Products: Per attached System Plan Summary

Certified by OTCO since: 02/16/1998

NOP effective date: 04/29/2002

**Anniversary Date:** 01/01/2015

Once certified, a production or handling operation's organic certification continues in effect until surrendered, suspended or revoked.

Certificate Issue Date: 05/28/2014

Authorized by:

Connie Karr, Certification Director

Certificate Number: Z-09805-2008

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Oregon Tilth, Inc.

2525 SE 3rd Street, Corvallis, OR 97333, USA • PH: 1-503-378-0690 • FX: 1-541-753-4924 • www.tilth.org • organic@tilth.org



## **Organic System Plan Summary**

Flavorganics, LLC 268 Doremus Avenue Newark, NJ 07105 United States Client Identification Number: OT-003274

Certificate Issue Date: 05/28/2014

Certified by OTCO since: 2/16/1998

#### **Certified Product (Organic)**

Product	Brands	Compliance	
Condiment/ Dressings/ Sauce	s:		
Syrup > Almond Syrup		NOP-Handling	
Syrup > Amaretto Syrup		NOP-Handling	
Syrup > Caramel Syrup		NOP-Handling	
Syrup > Chocolate Syrup		NOP-Handling	
Syrup > French Vanilla Syrup		NOP-Handling	- —
Syrup > Hazelnut Syrup		NOP-Handling	- —
Syrup > Irish Creme Syrup		NOP-Handling	- —
Syrup > Lime Syrup		NOP-Handling	- —
Syrup > Mango Syrup		NOP-Handling	- —
Syrup > Peppermint Syrup		NOP-Handling	- —
Syrup > Pomegranate Syrup		NOP-Handling	- —
Syrup > Pumpkin Spice Syrup		NOP-Handling	- —
Syrup > Raspberry Syrup		NOP-Handling	

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## Flavors/Colors:

Extracts > Almond Extract	Flavorganics	NOP-Handling	
Extracts > Anise Extract	Flavorganics	NOP-Handling	
Extracts > Chocolate Extract	Flavorganics	NOP-Handling	
Extracts > Coconut Extract	Flavorganics	NOP-Handling	
Extracts > Coffee Extract	Flavorganics	NOP-Handling	
Extracts > Hazelnut Extract	Flavorganics	NOP-Handling	
Extracts > Lemon Extract	Flavorganics	NOP-Handling	
Extracts > Orange Extract	Flavorganics	NOP-Handling	
Extracts > Peppermint Extract	Flavorganics	NOP-Handling	
Extracts > Vanilla Extract	Flavorganics	NOP-Handling	
Sweeteners:			
Sugar/ Molasses > Sugar Cane		NOP-Handling	



## **Certification Acknowledgement**

This is to certify that

Natural Flavors, Inc. 268 Doremus Ave Newark, NJ 07105 United States

is Certified Organic by Oregon Tilth under the US National Organic Program 7 CFR Part 205

Scope: NOP-Handling

**Client Identification Number: OT-007071** 

Certified Organic Products: Per attached System Plan Summary

Certified by OTCO since: 02/01/1997

NOP effective date: 04/29/2002

**Anniversary Date:** 01/01/2015

Once certified, a production or handling operation's organic certification continues in effect until surrendered, suspended or revoked.

Certificate Issue Date: 09/04/2014

Authorized by:

Connie Karr, Certification Director

Certificate Number: Z-11051-2008

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Oregon Tilth, Inc.

2525 SE 3rd Street, Corvallis, OR 97333, USA • PH: 1-503-378-0690 • FX: 1-541-753-4924 • www.tilth.org • organic@tilth.org



## **Certification Acknowledgement**

This is to certify that

Natural Flavors, Inc. 268 Doremus Ave Newark, NJ 07105 United States

is declared by Oregon Tilth to be in compliance with the following standards / programs:

Standard / Program

**Certification Period** 

ACB EU Equivalent-Handling

01/01/2014 - 01/01/2015

US/Canada Equivalence-Handling

Compliant Since: 06/23/2011



This document has been issued on the basis of Article 29(1) of Regulation (EC) No 834/2007 and of Regulation (EC) No 889/2008. The declared operator has submitted his activities under control, and meets the requirements laid down in the named Regulations.

Date of last inspection:

04/09/2014

EU Code No.: US-ORG-042

**Client Identification Number: OT-007071** 

Certificate Issue Date: 09/04/2014

Certified by OTCO since: 2/1/1997

Authorized by:

from I have

Connie Karr, Certification Director

Certificate Number: Z-11051-2008 Doc - Certificate | Rev. 5/8/2014

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# **Organic System Plan Summary**

Natural Flavors, Inc. 268 Doremus Ave Newark, NJ 07105 United States Client Identification Number: OT-007071

Certificate Issue Date: 09/04/2014

Certified by OTCO since: 2/1/1997

Certified Product (Organic)		
Product	Compliance	
Flavors/Colors:		
Extracts > Almond Extract 113500	NOP-Handling, ACB EU Equivalent-Handling	
Extracts > Almond Extract 113511	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling	
Extracts > Almond Extract 113983	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling	
Extracts > Almond Extract 116359	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling	
Extracts > Anise Extract	NOP-Handling	
Extracts > Bergamot Extract 113804A	NOP-Handling	
Extracts > Caramel Extract  113641A	NOP-Handling	
Extracts > Celery Extract  116055	NOP-Handling	
Extracts > Chipotle Extract 116367	NOP-Handling, ACB EU Equivalent-Handling, US/CanadaEquivalence-Handling	
Extracts > Chipotle Extract 116402	NOP-Handling, US/Canada Equivalence-Handling	
Extracts > Chocolate Extract 113589	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling	
Extracts > Chocolate Extract 113787A	NOP-Handling	
Extracts > Chocolate Extract 116331	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling	
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Extracts > Citrus Extract 113860A	NOP-Handling
Extracts > Coconut Extract	NOP-Handling, US/Canada Equivalence-Handling
Extracts > Coffee Extract  113590	NOP-Handling
Extracts > Ginger Extract 115569	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Extracts > Grapefruit Extract 116244	NOP-Handling, US/Canada Equivalence-Handling
Extracts > Grapefruit Extract WONF 115776	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Extracts > Hazelnut Extract  113591	NOP-Handling
Extracts > Lemon Extract 111024	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Extracts > Lemon Extract 114075	NOP-Handling, US/Canada Equivalence-Handling
Extracts > Lime Extract 113697B	NOP-Handling, ACB EU  Equivalent-Handling, US/Canada
Extracts > Lime Extract 115726	NOP-Handling, US/Canada Equivalence-Handling
	NOP-Handling, US/Canada  Equivalence-Handling
Extracts > Menthol Extract	NOP-Handling
Extracts > Orange Extract 113150	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
	NOP-Handling, US/Canada Equivalence-Handling
Extracts > Peanut Extract  114064	NOP-Handling
Extracts > Peppermint Extract 111481	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Extracts > Peppermint Extract  114048	NOP-Handling
Extracts > Rum Extract 113694	NOP-Handling
Extracts > Spearmint Extract 116153	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Extracts > Tangerine Extract 113860A	NOP-Handling
Extracts > Tangerine Extract 114131	NOP-Handling

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Extracts > Vanilla Extract	NOP-Handling, US/Canada Equivalence-Handling
Flavors > Acai Flavor	NOP-Handling, US/Canada
	Equivalence-Handling
Flavors > Acai Flavor  114132	NOP-Handling 
Flavors > Almond Flavor 114203	NOP-Handling
Flavors > Almond Flavor Almond Type 115258	NOP-Handling
Flavors > Almond Flavor WONF 115121	NOP-Handling
Flavors > Amaretto Flavor 111569A	NOP-Handling
Flavors > Apple Flavor 113447	NOP-Handling
Flavors > Apple Flavor 114114	NOP-Handling
Flavors > Apple Flavor Apple Cobbler Type 115283	NOP-Handling
Flavors > Apricot Flavor	NOP-Handling
Flavors > Banana Flavor	NOP-Handling, US/Canada  Equivalence-Handling
Flavors > Banana Flavor	NOP-Handling, US/Canada
Banana Type 116103	Equivalence-Handling
Flavors > Bergamot Flavor  113804	NOP-Handling
Flavors > Berry Flavor	NOP-Handling
Flavors > Berry Flavor	
Mixed Berry Type 116256	Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Berry Flavor	NOP-Handling, ACB EU
Mixed Berry Type Powder 116487	Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Berry Flavor	NOP-Handling, US/Canada
Mixed Berry WONF 115908	Equivalence-Handling
Flavors > Berry Flavor <u>WONF 115570</u>	NOP-Handling
Flavors > Berry Flavor	NOP-Handling, US/Canada
	Equivalence-Handling
Flavors > Black Currant Flavor	NOP-Handling — — — — — — — — — — — — — — — — — — —
Flavors > Black Currant Flavor  114139	NOP-Handling — — — — — — — — — — — — — — — — — — —
Flavors > Black Currant Flavor Black Currant Type 114139E	NOP-Handling — — — — — — — — — — — — — — — —
Flavors > Blackberry Flavor 113719	NOP-Handling — — — — — — — — — — — — — — — —
Flavors > Blueberry Flavor	NOP-Handling, ACB EU
113446 — — — — — — — — — — — — — — — — — — —	Equivalent-Handling, US/Canada  Equivalence-Handling
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Flavors > Blueberry Flavor 	NOP-Handling
Flavors > Blueberry Flavor 114061A	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Blueberry Flavor 114061D	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Blueberry Flavor Blueberry Cobbler Type 115284	NOP-Handling
Flavors > Blueberry Flavor Blueberry Type OS 114199	NOP-Handling
Flavors > Blueberry Flavor  WONF 116016  — — — — — — — — — — — — — — — — — — —	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Brown Sugar Flavor 113845B	NOP-Handling
Flavors > Butter Flavor 113318	NOP-Handling
Flavors > Butter Flavor 	NOP-Handling
Flavors > Butter Flavor 	NOP-Handling
Flavors > Butter Flavor Butter Powder 113820	NOP-Handling
Flavors > Butter Flavor Butter Type 114685	NOP-Handling
Flavors > Butter Flavor Diacetyl Free 113698D	NOP-Handling
Flavors > Butter Flavor Diacetyl Free SD 113698A	NOP-Handling
Flavors > Caramel Flavor 	NOP-Handling
Flavors > Caramel Flavor 113641E	NOP-Handling
Flavors > Caramel Flavor	NOP-Handling
Flavors > Caramel Flavor Caramel Type 115809	NOP-Handling, US/Canada Equivalence-Handling
Flavors > Caramel Flavor	NOP-Handling, ACB EU
Caramel Type 116840	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Chai Flavor Chai Spice 113561D	NOP-Handling - — — — — — — — — — — — — — — — — — — —
Flavors > Chai Flavor Chai Vanilla 113549D	NOP-Handling
Flavors > Cheddar Flavor 113701	NOP-Handling
Flavors > Cheddar Flavor Cheddar Cheese Powder 113684	NOP-Handling
Flavors > Cheddar Flavor	NOP-Handling
White Cheddar Powder 113684A	
Flavors > Cheesecake Flavor	NOP-Handling
Cheesecake Type 113966D  Certificate Number: Z-11051-2008   Page 4 of 13	
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Flavors > Cherry Flavor Cherry Flavor Wonf 113448	NOP-Handling
Flavors > Cherry Flavor Cherry Wonf 116188	NOP-Handling, ACB EU Equivalent-Handling, US/CanadaEquivalence-Handling
Flavors > Chocolate Flavor 113988	NOP-Handling, ACB EU Equivalent-Handling, US/CanadaEquivalence-Handling
Flavors > Chocolate Flavor 114659	NOP-Handling
Flavors > Chocolate Flavor 116629	NOP-Handling, ACB EU  Equivalent-Handling, US/Canada  Equivalence-Handling
Flavors > Cinnamon Flavor 113703A	NOP-Handling, ACB EU Equivalent-Handling, US/CanadaEquivalence-Handling
Flavors > Cinnamon Flavor 113703B	NOP-Handling
Flavors > Cinnamon Flavor 115808	NOP-Handling, US/Canada Equivalence-Handling
Flavors > Cinnamon Flavor WONF 115562	NOP-Handling, ACB EU  Equivalent-Handling, US/Canada  Equivalence-Handling
Flavors > Coconut Flavor 113661B	NOP-Handling, US/Canada Equivalence-Handling
Flavors > Coconut Flavor 116656	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Coconut Flavor Coconut Type 115259	NOP-Handling, US/CanadaEquivalence-Handling
Flavors > Coconut Flavor  WONF 115075	NOP-Handling, US/CanadaEquivalence-Handling
Flavors > Coffee Flavor 113325	NOP-Handling
Flavors > Cosmopolitan Flavor  114094	NOP-Handling
Flavors > Cranberry Flavor 113443	NOP-Handling, ACB EU  Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Cranberry Flavor Cranberry-Pomegranate 114055A	NOP-Handling
Flavors > Cranberry Flavor  WONF 116252  — — — — — — — — — — — — — — — — — — —	NOP-Handling, ACB EU Equivalent-Handling, US/CanadaEquivalence-Handling
Flavors > Cream Flavor	NOP-Handling
Flavors > Cream Flavor Irish Cream 113721	NOP-Handling
Flavors > Cream Flavor Irish Cream 113721A	NOP-Handling
Flavors > Eggnog Flavor	NOP-Handling
Flavors > Flavor Blend Cherry Berry WONF 116764	NOP-Handling, US/Canada  Equivalence-Handling
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	NOD II. III. AOD EII
Flavors > Flavor Blend	NOP-Handling, ACB EU
Fruit Enhancer 116179	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Flavor Blend	NOP-Handling, US/Canada
	Equivalence-Handling
Flavors > Flavor Blend	NOP-Handling, ACB EU
Neutral Cloud S.D. 116693	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Flavor Blend	NOP-Handling
Proprietary Blend SD 114194A	
Flavors > Flavor Blend	NOP-Handling, US/Canada
_Punch 115909	Equivalence-Handling
Flavors > Flavor Blend	NOP-Handling, ACB EU
Purple 115906	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Flavor Blend	NOP-Handling, ACB EU
Red 115905	Equivalent-Handling, US/Canada
	Equivalence-Handling
	NOP-Handling, US/Canada
Tropical 116101 WONF	Equivalence-Handling
Flavors > Flavor Blend	NOP-Handling, US/Canada
Tropical 116109 WONF	Equivalence-Handling
Flavors > Flavor Blend	NOP-Handling, US/Canada
Yellow 115904	Equivalence-Handling
Flavors > Fruit Flavor	NOP-Handling
	NOP-Handling
Red Fruit 113772	
Flavors > Ginger Flavor	NOP-Handling, ACB EU
Ginger Beer 116643	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Ginger Flavor	NOP-Handling, ACB EU
Ginger Cookie Type 116843	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Ginger Flavor	NOP-Handling
Gingerale 113741A	
Flavors > Goji Flavor	NOP-Handling
_114104	
Flavors > Grape Flavor	NOP-Handling, US/Canada
	Equivalence-Handling
Flavors > Grape Flavor	NOP-Handling
_114599	
Flavors > Grape Flavor	NOP-Handling, US/Canada
Grape Type 115757	Equivalence-Handling
Flavors > Grape Flavor	NOP-Handling
Niagara Grape 114021A	-
Flavors > Guava Flavor	
114111E	· <b>J</b>
Flavors > Hazelnut Flavor	
112614	
Flavors > Hazelnut Flavor	
113737B	1101 Flandling
Flavors > Hibiscus Flavor	
114343	NOF-I landing

Flavors > Honey Flavor WONF 116234	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Jasmine Flavor 114665	NOP-Handling
Flavors > Kiwi Flavor 113938B	NOP-Handling
Flavors > Kiwi Flavor 113938K	NOP-Handling
Flavors > Lemon Flavor 114108	NOP-Handling
Flavors > Lemon Flavor 114186	NOP-Handling
Flavors > Lemon Flavor 114196	NOP-Handling
	NOP-Handling, ACB EU
Lemon Emulsion 113755	Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Lemon Flavor	NOP-Handling, ACB EU
Lemon Flavor S.D. 116532	Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Lemon Flavor	NOP-Handling, ACB EU
Lemon Powder 113762A	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Lemon Flavor	NOP-Handling, US/Canada
	Equivalence-Handling
Flavors > Lemon Flavor	NOP-Handling, ACB EU
Lemon Powder 116488	Equivalent-Handling, US/Canada  Equivalence-Handling
Flavors > Lemon Flavor	NOP-Handling, ACB EU
Lemon WONF 116659	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Lemon Flavor	NOP-Handling, ACB EU
WONF 116750	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Lemongrass Flavor	NOP-Handling, ACB EU
116261	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Lime Flavor	NOP-Handling
Lime Emulsion	
Flavors > Lime Flavor	NOP-Handling, ACB EU
WONF 116272	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Mango Flavor 	NOP-Handling
Flavors > Mango Flavor	NOP-Handling
Flavors > Mango Flavor	NOP-Handling, US/Canada
<u>113986E</u>	Equivalence-Handling
Flavors > Mango Flavor	NOP-Handling, ACB EU
Mango Emulsion 113713	Equivalent-Handling, US/Canada
	Equivalence-Handling

Flavors > Mango Flavor	NOP-Handling, ACB EU
Mango Type 116211	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Mango Flavor	NOP-Handling, ACB EU
Mango Type 116283	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Mango Flavor	NOP-Handling, ACB EU
WONF 116255	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Mangosteen Flavor	NOP-Handling
Flavors > Maple Flavor	NOP-Handling, ACB EU
116398 WONF	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Maple Flavor	NOP-Handling, ACB EU
WONF 113659	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Margarita Flavor	NOP-Handling
114060	
Flavors > Margarita Flavor	NOP-Handling
114095	-
Flavors > Milk Flavor	NOP-Handling
Condensed Milk 113323	, and the second
Flavors > Milk Flavor	NOP-Handling
Fresh Milk Type 114686	<b>G</b>
Flavors > Milk Flavor	NOP-Handling
Milk Powder 113444	ŭ
Flavors > Mint Flavor	NOP-Handling, ACB EU
115135	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Mint Flavor	NOP-Handling
Spring Mint 113708	ŭ
	NOP-Handling, ACB EU
Cola 116092	Equivalent-Handling, US/Canada
	Equivalence-Handling
	NOP-Handling
113252A	
Flavors > Oatmeal Flavor	NOP-Handling, ACB EU
Spice Oatmeal 114030	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Orange Flavor	NOP-Handling
112713E	
Flavors > Orange Flavor	NOP-Handling, ACB EU
113757	Equivalent-Handling, US/Canada
	Equivalence-Handling
	NOP-Handling
114003	5. · · · <del>· · · · · · · · · ·</del>
Flavors > Orange Flavor	
Orange Passion Flavor 114053	
Flavors > Orange Flavor	NOP-Handling, US/Canada
Valencia Orange 116100	Equivalence-Handling
Flavors > Passionfruit Flavor	NOP-Handling
113599C	1101 Handling

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Flavors > Peach Flavor 113643	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Peach Flavor 113643D	NOP-Handling
Flavors > Peach Flavor 113643H	NOP-Handling
Flavors > Peach Flavor 113643T	NOP-Handling
Flavors > Peach Flavor 113643V	NOP-Handling
Flavors > Peach Flavor 116013	NOP-Handling, ACB EU  Equivalent-Handling, US/Canada  Equivalence-Handling
Flavors > Peach Flavor	NOP-Handling, ACB EU
116635	Equivalent-Handling, US/CanadaEquivalence-Handling
Flavors > Peanut Flavor Peanut Oil Roasted 113914	NOP-Handling
Flavors > Peanut Flavor  WONF 116037	NOP-Handling
Flavors > Pear Flavor 113112A	NOP-Handling
Flavors > Pear Flavor 113112P	NOP-Handling
Flavors > Peppermint Flavor 114083	NOP-Handling
Flavors > Pineapple Flavor 113690A	NOP-Handling
Flavors > Pineapple Flavor 113690B	NOP-Handling
Flavors > Pineapple Flavor 116189	NOP-Handling, ACB EU Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Pineapple Flavor Pineapple Type 116388	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Pomegranate Flavor	NOP-Handling
Flavors > Pomegranate Flavor 113533B	NOP-Handling
Flavors > Pomegranate Flavor 113533C	NOP-Handling
Flavors > Pomegranate Flavor 114047	NOP-Handling
Flavors > Pomegranate Flavor 114047C	NOP-Handling
Flavors > Pomegranate Flavor 114068A	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Pomegranate Flavor	NOP-Handling

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Flavors > Pomegranate Flavor 116631	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Pomegranate Flavor Pomegranate Type 115368	NOP-Handling
Flavors > Pomegranate Flavor WONF 115474	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Pomegranate Flavor  WONF 115482  — — — — — — — — — — — — — — — — — — —	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Pomegranate Flavor  WONF 115547  — — — — — — — — — — — — — — — — — — —	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Pumpkin Flavor Pumpkin Spice 114899	NOP-Handling
Flavors > Raspberry Flavor 113554	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Raspberry Flavor 113554A	NOP-Handling
Flavors > Raspberry Flavor	NOP-Handling
Flavors > Raspberry Flavor	NOP-Handling
Flavors > Raspberry Flavor 113962B	NOP-Handling, US/Canada Equivalence-Handling
Flavors > Raspberry Flavor 114066A	NOP-Handling
Flavors > Raspberry Flavor Raspberry Type 115366	NOP-Handling
Flavors > Raspberry Flavor Raspberry Type OS 114197	NOP-Handling
Flavors > Raspberry Flavor Raspberry Type Powder 116489	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Rum Flavor White Rum Type 116773	NOP-Handling, ACB EU  Equivalent-Handling, US/Canada  Equivalence-Handling
Flavors > Spearmint Flavor 114058	NOP-Handling
Flavors > Spice Flavor Holiday Spice Type 116786	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Strawberry Flavor 113445	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Strawberry Flavor	NOP-Handling
Flavors > Strawberry Flavor 113496A	NOP-Handling
Flavors > Strawberry Flavor 113964	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
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Flavors > Strawberry Flavor Strawberry Type 114198	NOP-Handling
Flavors > Strawberry Flavor Strawberry Type 114489	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Strawberry Flavor Strawberry Type 116792	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Strawberry Flavor  WONF 115989  — — — — — — — — — — — — — — — — — — —	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
Flavors > Strawberry Flavor  WONF 115990  — — — — — — — — — — — — — — — — — — —	NOP-Handling, ACB EU Equivalent-Handling, US/Canada
Flavors > Tea Flavor Black Tea 113842	NOP-Handling
Flavors > Tea Flavor Green Tea 112618A	NOP-Handling
Flavors > Triple Sec Flavor	NOP-Handling
Flavors > Vanilla Flavor Concentrated	NOP-Handling
Flavors > Vanilla Flavor Concentrated  Vanilla Concentrate Flavor	NOP-Handling
Flavors > Vanilla Flavor	NOP-Handling
Flavors > Vanilla Flavor	NOP-Handling
Flavors > Vanilla Flavor 113280A	NOP-Handling, ACB EU  Equivalent-Handling, US/Canada  Equivalence-Handling
Flavors > Vanilla Flavor 113280B	NOP-Handling
Flavors > Vanilla Flavor 113383	NOP-Handling, ACB EU  Equivalent-Handling, US/Canada  Equivalence-Handling
Flavors > Vanilla Flavor 113383B	NOP-Handling
Flavors > Vanilla Flavor 113383F	NOP-Handling, ACB EU  Equivalent-Handling, US/Canada  Equivalence-Handling
Flavors > Vanilla Flavor 113866	NOP-Handling
Flavors > Vanilla Flavor 113890	NOP-Handling
Flavors > Vanilla Flavor	NOP-Handling, ACB EU Equivalent-Handling, US/Canada Equivalence-Handling
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Flavors > Vanilla Flavor 114138	NOP-Handling
Flavors > Vanilla Flavor	NOP-Handling
Flavors > Vanilla Flavor 115122	NOP-Handling
Flavors > Vanilla Flavor 115147	NOP-Handling
Flavors > Vanilla Flavor	NOP-Handling, US/Canada
115845	Equivalence-Handling
Flavors > Vanilla Flavor French Vanilla Powder 113383D	NOP-Handling
Flavors > Vanilla Flavor	
Vanilla Custard 113592A	g
Flavors > Vanilla Flavor	NOP-Handling
Flavors > Vanilla Flavor	NOP-Handling
Vanilla OS 114124B	
Flavors > Vanilla Flavor	NOP-Handling, ACB EU
Vanilla Powder 113281	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Vanilla Flavor Vanilla Specks	NOP-Handling
Flavors > Vanilla Flavor  Vanilla WONF 114790	NOP-Handling
Flavors > Vanilla Flavor	
Vanilla WONF 115756	
	NOP-Handling, ACB EU
Vanilla WONF 115803	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Vanilla Flavor	NOP-Handling, ACB EU
Vanilla WONF 116152	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Vanilla Flavor	NOP-Handling, ACB EU
Vanilla WONF 116549	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Vanilla Flavor	NOP-Handling, ACB EU
WONF 115973	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Vanilla Flavor	NOP-Handling, ACB EU
WONF 115974	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Watermelon Flavor	NOP-Handling, ACB EU
Watermelon Type 116064	Equivalent-Handling, US/Canada Equivalence-Handling
Flavora > Whinned Croom Flavor	
Flavors > Whipped Cream Flavor 113403A	NOP-Handling
Flavors > Whipped Cream Flavor	
Whipped Cream Type 115286	<b>-</b>
Flavors > Wildberry Flavor	NOP-Handling, ACB EU
113729	Equivalent-Handling, US/Canada
	Equivalence-Handling
Flavors > Yumberry Flavor 114102	NOP-Handling
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Flavors > Yumberry Flavor 114102A	NOP-Handling
Flavors > Yumberry Flavor Yumberry Type OS 114185A	NOP-Handling
Herbs/Spices/Seasonings:	
Herbs/Spices > Hibiscus Hibiscus Powder	NOP-Handling
Herbs/Spices > Vanilla Bean	NOP-Handling
Misc > Herbal Syrups 113773	NOP-Handling
Oils/Oleoresins:	
Oils > Cinnamon Oil	NOP-Handling
Oils > Grapefruit Oil	
1222	Equivalent-Handling, US/CanadaEquivalence-Handling
Oils > Lemon Oil	NOP-Handling, ACB EU
11182	Equivalent-Handling, US/CanadaEquivalence-Handling
Oils > Lime Oil	NOP-Handling, ACB EU
11248	Equivalent-Handling, US/CanadaEquivalence-Handling
Oils > Orange Oil	NOP-Handling, ACB EU
11144	Equivalent-Handling, US/CanadaEquivalence-Handling
Oils > Peppermint Oil	NOP-Handling, ACB EU
11164	Equivalent-Handling, US/Canada
Ollan Tarandra Oll	Equivalence-Handling
Oils > Tangerine Oil 11989	NOP-Handling, ACB EU Equivalent-Handling, US/Canada
11000	Equivalence-Handling
	<u></u>



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## Official QAI Product Certification Listing

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## Company:

#### Activ International Inc.

253 Lackland Drive West Middlesex, NJ 08846 USA

Show all certified products (#showAll) | Hide all certified products (#hideAll)

### **Facility Information:**

#### Facility #1: Activ International Inc.

253 Lackland Drive West Middlesex, NJ 08846 USA

#### **Certification Type:**

#### NOP - Handler (Distributor) (#11)

Certification Number: C0029663-NOPHDS-7

#### ■ NOP - Handler (Processor) (#12)

Certification Number: C0029663-NOPHPC-7

#### **Product Details:**

Product Name	Claim Description	Listed Date
#11051 Beef Flavor (Roasted)	Organic	10/19/2005
#12047 Beef Flavor (Roasted)	Organic	10/19/2005
#12058 Beef Flavor N/S	Organic	1/14/2009
#13019 Beef Flavor (Dripping)	Organic	5/4/2005
#20029 Kosher Chicken Flavor	Organic	10/5/2009
#20321 Chicken Flavor Extract	Organic	3/20/2014
#21030 Chicken Flavor (Roasted)	Organic	5/4/2005
#21038 Chicken Flavor (Boiled) Concentrate	Organic	6/13/2006

#21080 Kosher Chicken Flavor	Organic	10/5/2009
#21084 Low Sodium Chicken Flavor	Organic	9/19/2012
#21094 Chicken Flavor	Organic	1/10/2013
#21099 Chicken Flavor N/S	Organic	3/26/2014
#21100 Chicken Flavor	Organic	7/30/2013
#21481 Chicken Flavor	Organic	3/18/2010
#22028 Chicken Flavor (Roasted)	Organic	5/4/2005
#22043 Chicken Flavor (Boiled)	Organic	10/19/2005
#22049 Chicken Flavor (Roasted)	Organic	10/19/2005
#22050 Chicken Flavor (Roasted) N/S	Organic	10/19/2005
#22073 Chicken Flavor	Organic	7/30/2013
#22074 Chicken Flavor	Organic	7/30/2013
#22075 Chicken Flavor	Organic	7/30/2013
#22575 Chicken Flavor	Organic	7/30/2013
#23025 Chicken Flavor (Lipid)	Organic	5/4/2005
#23043 Chicken Flavor	Organic	3/12/2008
#23055 Chicken Flavor	Organic	7/30/2013
#25016 Chicken Broth	Organic	5/21/2012
#25017 Chicken Broth	Organic	5/21/2012
#25024 Chicken Broth	Organic	7/11/2014
#26017 Chicken Flavor WONF	Organic	6/13/2006
#61015 Turkey Flavor (Roasted)	Organic	6/13/2006
#62016 Turkey Flavor (Roasted)	Organic	5/16/2007
#62019 Turkey Flavor N/S	Organic	1/14/2009
#73067 Chef's Grill Flavor	Organic	5/25/2005
#840123 Cooked Vegetable Flavor	Organic	6/12/2014
#84038 Onion Flavor (Roasted)	Organic	9/6/2006
#84041 Mushroom Flavor (Roasted)	Organic	5/4/2005
#84049 Green Pepper Flavor (Roasted)	Organic	9/6/2006
#84058 Caramelized Red Pepper Flavor	Organic	1/26/2009
#84062 Carrot Flavor (Roasted)	Organic	5/4/2005
#84079 Carmelized Tomato Flavor	Organic	5/16/2007
#84081 Carmelized Red Pepper Flavor	Organic	6/13/2006
#84085 Fire-Roasted Flavor	-	4/30/2007
#84091 Carmelized Onion Flavor	Organic	5/16/2007
	Organic	5/16/2007
#84093 Strong-Carmelized Onion Flavor	Organic	
#84096 Tomato Flavor (Fresh)	Organic	4/3/2009
#84371 French Onion Broth Flavor	Organic	5/16/2007
#84395 French Onion Broth Flavor	Organic	5/16/2007
#91059 Vegetarian Flavor (Taste of Chicken)	Organic	1/26/2009
#91060 Vegetarian Flavor (Taste of Red Meat)	Organic	1/26/2009
#91080 Vegetarian Flavor (Chicken)	Organic	6/10/2014
#91580 Vegetarian Flavor (Chicken)	Organic	6/16/2014
#920108 Roasted Onion Flavor	Organic	6/13/2006
#920131 Vegetarian Beef Flavor	Made with Organic - 70-95% Organic	3/12/2008
#92057 Vegetable Flavor (Roasted)	Organic	5/4/2005
#925108 Roasted Onion Flavor	Organic	8/9/2013
#926119 Antifoam	Organic	4/30/2007
#930133 Toasted Garlic Flavor	Organic	6/13/2006
#93122 Clarified Butter Flavor	Organic	5/4/2005
#940110 Vegetable Stock Flavor	Organic	1/26/2009
#940123 Vegetable Stock Flavor	Organic	6/10/2014
#940124 Mirepoix Flavors	Organic	6/3/2014

#940125 Vegetable Stock Flavor	Organic	6/16/2014
#94069 Vegetable Stock Flavor N/S	Organic	5/4/2005
#94082 Vegetable Stock Flavor	Organic	5/4/2005
#94089 Mirepoix Flavor	Made with Organic - 70-95% Organic	5/25/2005
#94090 Vegetable Stock Flavor	Organic	5/25/2005
#94097 Vegetable Stock Intermediate Flavor	Organic	6/13/2006
#960102 Yeast Extract, Reconstitued	Organic	6/3/2014
#96097 Fluid Yeast Extract	Organic	1/26/2009

## US/Canada Equivalency - Handler (Processor) (#13)

**Certification Number:** 

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## Company:

#### Allen Flavors, Inc.

23 Progress Street Edison, NJ 08820 USA

Show all certified products (#showAll) | Hide all certified products (#hideAll)

### **Facility Information:**

#### Facility #1: Allen Flavors, Inc.

23 Progress Street Edison, NJ 08820 USA

#### **Certification Type:**

#### = NOP - Handler (Processor) (#11)

Certification Number: C0031650-NOPHPC-6

#### **Product Details:**

Product Name	Claim Description	Listed Date
AF 14150 Vanilla Extract 3X	Organic	5/4/2010
AF 15462 Mandarin Green Flavor	Organic	2/15/2013
AF 15463 Lemongrass Oil Natural	Organic	5/29/2014
AF 15464 Spearmint Fields Natural	Organic	10/22/2013
AF 15968 Orange Extract	Organic	10/2/2013
AF 15969 Lime Extract	Organic	3/17/2014
AF 16095 Lemon Extract	Organic	10/2/2013
AF 16664 Vanilla Extract	Organic	9/18/2013
AF 16665 Vanilla Extract	Organic	9/18/2013
AF 16995 Citrus Blend Natural	Organic	7/9/2014
AF 16996 Orange Flavor	Organic	3/17/2014

AF 17039 Pomegranate Nat Type	Organic	3/20/2014
AF 17116 Lemon Oil	100% Organic	1/7/2014
AF 17221 Ginger Natural		5/29/2014
AF 17222 Coconut Flavor Natural WONF	Organic	2/17/2014
	Organic	3/13/2014
AF 17225 Lemonade Ginger	Organic	
AF 17226 Pineapple Mint Natural Type	Organic	2/17/2014
AF 17234 Mango Carrot Natural WONF	Organic	3/13/2014
AF 17265 Apple Juice Flavor Nat Type	Organic	3/17/2014
AF 17296 Pineapple Natural Type	Organic	4/25/2014
AF 17297 Strawberry Sweet Eve Natural	Organic	6/11/2014
AF 17298 Watermelon Natural WONF	Organic	4/25/2014
AF 17315 Strawberry Natural Type	Organic	4/25/2014
AF 17317 Peach Natural WONF	Organic	4/4/2014
AF 17330 Blueberry Natural WONF	Organic	4/25/2014
AF 17334 Lemonade Ginger	Organic	5/1/2014
AF 17339 Lemon Natural	100% Organic	3/27/2014
AF 17361 Pineapple Natural Type	Organic	5/29/2014
AF 17362 Pineapple Nat Type	Organic	6/11/2014
AF 17363 Pineapple Nat Type	Organic	6/11/2014
AF 17364 Peach Natural WONF	Organic	5/29/2014
AF 17366 Grapefruit Red Flavor Natural WONF	Organic	9/26/2014
AF 17381 Grapefruit Extract	Organic	9/10/2014
AF 17392 Hibiscus Natural Flavor Type	Organic	5/1/2014
AF 17397 Peach Natural WONF	Organic	10/9/2014
AF 17400 Banana Natural WONF	Organic	5/29/2014
AF 17448 Lemon Extract	Organic	5/1/2014
AF 17467 Rose Natural	Organic	5/29/2014
AF 17468 Lavender Natural	Organic	5/29/2014
AF 17470 Cranberry Natural Type	Organic	6/5/2014
AF 17471 Peach Lavender Natural WONF	Organic	5/29/2014
AF 17474 Chai Tea WONF	Organic	9/10/2014
AF 17478 Berry WONF	Organic	6/5/2014
AF 17490 KI Water Natural Type	-	7/9/2014
,,	Organic	
AF 17499 Raspberry Nat WONF	Organic	6/5/2014
AF 17518 Cinnamon Natural	Organic	5/29/2014
AF 17519 Cinnamon Natural	Organic	5/29/2014
AF 17550 Lychee Nat WONF	Organic	7/9/2014
AF 17626 Mango Nat WONF	Organic	7/28/2014
AF 17660 Mojito Nat Type	Organic	10/9/2014
AF 17728 Guava Nat Type	Organic	9/26/2014
AF 17729 Lemongrass NAT Type	Organic	9/10/2014
AF 17762 Orange Bitter Natural	Organic	10/13/2014
AF 17772 Cola Fl Natural Type	Organic	10/13/2014
AF 17809 Peach Nat WONF	Organic	10/20/2014
AF 17814 Peach White Nat Type	Organic	10/20/2014
AF 17832 Lime Peely Natural WONF	Organic	10/20/2014
AF 17833 Lime Peely Natural WONF	Organic	10/20/2014
AF 17834 Lemon Meyer Natural Type	Organic	10/20/2014
AF 17835 Lemon Meyer Natural Type	Organic	10/20/2014
AF 20331 Black Tea	100% Organic	7/10/2006
AF 20655 Green Tea	100% Organic	3/26/2007
AF 20727 Black Tea Powder	100% Organic	4/9/2007
AF 21579 Tea Essence	Organic	10/20/2008

AF 21791 Acai White Cranberry Base	Ingredient Panel Only	10/20/2008
AF 21792 Green Tea Concentrate	100% Organic	10/20/2008
AF 21798 Green Tea Premix	Organic	11/18/2009
AF 23299 Green Tea Premix	Made with Organic - 70-95% Organic	3/8/2010
AF 23356 Agave Syrup	Organic	3/5/2010
AF 24185 Green Tea & Ginseng Premix	Made with Organic - 70-95% Organic	3/11/2011
AF 24383 Decaf Black Tea Powder	Organic	5/11/2011
AF 24457 Organic Black Tea Essence	100% Organic	11/20/2012
AF 24654 Oolong Tea Premix	100% Organic	8/16/2011
AF 24975 Black Tea Premix	Made with Organic - 70-95% Organic	5/30/2012
AF 24977 Green Tea Premix	Organic	5/30/2012
AF 25067 Aloe Green Tea Premix	100% Organic	5/30/2012
AF 25068 Coconut Green Tea Base	Ingredient Panel Only	2/12/2013
AF 25069 Mate Mint Green Tea Premix	Organic	5/30/2012
AF 25070 Mint Green Tea Base	Ingredient Panel Only	5/30/2012
AF 25071 Camu Green Tea Premix	Organic	5/30/2012
AF 25072 Camu Green Tea Base	Ingredient Panel Only	5/30/2012
AF 25073 Macqui Berry Green Tea Premix	Organic	5/30/2012
AF 25074 Macqui Berry Green Tea Base	Ingredient Panel Only	5/30/2012
AF 25363 Coconut Green Tea Base	Made with Organic - 70-95% Organic	5/30/2012
AF 25364 Camu Green Tea Base	Ingredient Panel Only	5/30/2012
AF 25365 Macqui Berry Green Tea Base	Ingredient Panel Only	5/30/2012
AF 25469 Half & Half Premix	100% Organic	5/30/2012
AF 25470 Half & Half Base	Made with Organic - 70-95% Organic	5/30/2012
AF 25502 Black Tea Premix	Organic	3/20/2014
AF 25552 Strawberry Base	Ingredient Panel Only	6/25/2012
AF 25667 Grapeade Base	Ingredient Panel Only	7/24/2012
AF 25712 Peach Paradise Base	Ingredient Panel Only	9/11/2012
AF 25859 Peach Paradise Base	Ingredient Panel Only	3/18/2013
AF 25863 Cranberry Base	Ingredient Panel Only	10/15/2012
AF 26070 Honeybush Tea Premix	Organic	3/14/2013
AF 26073 Mango Base	Ingredient Panel Only	3/20/2014
AF 26074 Peach Base	Ingredient Panel Only	3/20/2014
AF 26076 Honey	100% Organic	10/3/2013
AF 26077 Green Tea Premix	Organic	3/20/2014
AF 26078 Black Tea Premix	Organic	2/15/2013
AF 26079 Peach Black Tea Base	Ingredient Panel Only	2/12/2013
AF 26111 Oolong Tea	100% Organic	1/22/2013
AF 26129 Raspberry Tea Base	Ingredient Panel Only	4/8/2013
AF 26189 Green Tea W/Honey Base	Ingredient Panel Only	1/28/2013
AF 26194 Green Tea Powder	100% Organic	1/28/2013
AF 26205 Vitamin Premix	Ingredient Panel Only	2/12/2013
AF 26376 Tea Essence	100% Organic	3/14/2013
AF 26474 Cherry Juice Sour	100% Organic	4/8/2013
AF 26551 Half & Half Premix	Organic	4/22/2013
AF 26641 Black Tea Premix	Organic	6/27/2013
AF 26642 Black Tea Lemonade Base	Made with Organic - 70-95% Organic	6/27/2013
AF 26643 Strawberry Black Tea Lemonade Base	Made with Organic - 70-95% Organic	6/27/2013
AF 26644 Green Tea Premix	Organic	6/27/2013
AF 26645 Green Tea Lemonade Base	Organic	6/27/2013
AF 26646 Pomegranate Tea Lemonade Base	Organic	6/27/2013
AF 26804 Cocoa Premix	Made with Organic - 70-95% Organic	8/15/2013
AF 26899 Watermelon Strawberry Base	Made with Organic - 70-95% Organic	8/21/2013

AF 26901 Grapefruit Base	Ingredient Panel Only	10/10/2013
AF 26993 Green Tea Premix	Made with Organic - 70-95% Organic	9/25/2013
AF 26994 Iced Tea Premix	Ingredient Panel Only	9/25/2013
AF 26995 Sweet Tea Premix	Made with Organic - 70-95% Organic	9/25/2013
AF 26996 Black Tea Premix	Organic	10/2/2013
AF 26997 Peach Base	Made with Organic - 70-95% Organic	10/2/2013
AF 26998 Green Tea Premix	Organic	10/2/2013
AF 26999 Citrus Pomegranate Base	Made with Organic - 70-95% Organic	10/2/2013
AF 27000 Half and Half Base	Made with Organic - 70-95% Organic	10/2/2013
AF 27003 Lemon Base	Made with Organic - 70-95% Organic	11/5/2013
AF 27004 Oolong Tea Premix	Organic	11/5/2013
AF 27006 White Tea Premix	Organic	10/2/2013
AF 27007 Spearmint Base	Ingredient Panel Only	11/5/2013
AF 27009 Green Tea Premix	Organic	10/2/2013
AF 27010 Honey Base	Ingredient Panel Only	11/5/2013
AF 27024 Mango Lychee Green Tea Premix	Organic	10/10/2013
AF 27025 Mango Lychee Base	Made with Organic - 70-95% Organic	10/10/2013
AF 27034 Mint Green Tea Premix	Made with Organic - 70-95% Organic	10/3/2013
AF 27068 Unsweetened Tea Premix	Organic	10/22/2013
AF 27069 Unsweetened Tea Base	Made with Organic - 70-95% Organic	10/22/2013
AF 27093 Mint Green Tea Premix	Made with Organic - 70-95% Organic	10/22/2013
AF 27107 Green Tea Premix	Organic	3/20/2014
AF 27109 Tea Base	Ingredient Panel Only	11/18/2013
AF 27110 Half & Half Premix	Organic	11/18/2013
AF 27111 Half Tea Half Lemonade Base	Made with Organic - 70-95% Organic	11/18/2013
AF 27130 Cocoa Premix	Made with Organic - 70-95% Organic	11/27/2013
AF 27134 Lemon Base	Made with Organic - 70-95% Organic	2/7/2014
AF 27135 Pomegranate White Tea Premix	Organic	11/18/2013
AF 27136 Pomegranate Base	Ingredient Panel Only	2/7/2014
AF 27137 Peach Base	Ingredient Panel Only	2/7/2014
AF 27138 Spearmint Base	Ingredient Panel Only	11/18/2013
AF 27165 Green Tea Premix	Organic	11/18/2013
AF 27166 Honey Base	Ingredient Panel Only	11/18/2013
AF 27216 Unsweetened Tea Premix	Organic	11/18/2013
AF 27224 Unsweetened Tea Premix	Organic	5/15/2014
AF 27225 Unsweetened Tea Base	Organic	5/15/2014
AF 27371 Half & Half Base	Made with Organic - 70-95% Organic	2/7/2014
AF 27450 Beet Apple Base	Organic	3/17/2014
AF 27457 Ginger	100% Organic	3/7/2014
AF 27486 Mango Carrot Base	Organic	3/17/2014
AF 27488 Turmeric Root	Organic	3/17/2014
AF 27546 Lemon Emulsion	Organic	4/4/2014
AF 27640 Chlorella Powder	100% Organic	5/1/2014
AF 27665 Lemon Tea Base	Made with Organic - 70-95% Organic	5/29/2014
AF 27706 Green Tea Base	Ingredient Panel Only	5/29/2014
AF 27717 Orange Mango Base	Ingredient Panel Only	5/29/2014
AF 27732 Pineapple Orange Banana Base	Ingredient Panel Only	6/11/2014
AF 27784 Orange 424577	Organic	7/17/2014
AF 27796 Pomegranate Tea Lemonade Base	Organic	7/28/2014
AF 27806 Root Beery Soda Base	Ingredient Panel Only	10/13/2014
AF 27807 Cola Soda Base	Ingredient Panel Only	9/10/2014
AF 27809 Cream Soda Base	Ingredient Panel Only	9/10/2014
AF 27810 Orange Cream Soda Base	Ingredient Panel Only	9/10/2014
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AF 27823 Half & Half Tea Lemonade Premix	Organic	7/28/2014
AF 27824 Half & Half Tea Lemonade Base	Made with Organic - 70-95% Organic	9/10/2014
AF 27825 Half & Half Green Tea Lemonade Premix	Organic	9/26/2014
AF 27827 Mango Lemonade OC Base	Made with Organic - 70-95% Organic	10/13/2014
AF 27828 Raspberry Lemonade OC Base	Made with Organic - 70-95% Organic	10/9/2014
AF 27829 Strawberry Lemonade OC Base	Made with Organic - 70-95% Organic	10/13/2014
AF 27830 Lemonade OC Base	Made with Organic - 70-95% Organic	9/10/2014
AF 27846 Unsweetened Lemon Black Tea Base	Organic	7/28/2014
AF 27847 Unsweetened Peach Black Tea Base	Organic	7/28/2014
AF 27889 Diet Black Tea Premix	Organic	10/20/2014
AF 27915 Red Natural Color	Organic	10/20/2014
AF 27927 Orange Strawberry Banana Juice Base	Ingredient Panel Only	10/9/2014
AF 27928 Strawberry Kiwi Juice Base	Ingredient Panel Only	10/9/2014
AF 27930 Orange Peach Mango Juice Base	Ingredient Panel Only	10/9/2014
AF 27931 Paradise Blend Juice Base	Made with Organic - 70-95% Organic	10/9/2014
AF 27996 Diet Lemonade OC Base	Organic	10/9/2014
AF 27998 Low Carb Strawberry Lemonade OC Base	Made with Organic - 70-95% Organic	10/13/2014
AF 28001 Low Carb Raspberry Lemonade OC Base	Organic	10/9/2014
AF 28002 Low Carb Mango Lemonade OC Base	Made with Organic - 70-95% Organic	10/13/2014
AF 28007 Apple Base	Ingredient Panel Only	9/26/2014
AF 28008 Pear Base	Ingredient Panel Only	9/26/2014
AF 28009 Concord Grape Base	Ingredient Panel Only	9/26/2014
AF 28026 100 Orange Peach Mango Juice Base	Ingredient Panel Only	10/13/2014
AF 28027 100 Orange Strawberry Banana Juice Base	Ingredient Panel Only	10/9/2014
AF 28028 100 Strawberry Kiwi Juice Base	Ingredient Panel Only	10/13/2014
AF 28029 Low Carb Cola Soda Base	Made with Organic - 70-95% Organic	10/20/2014
AF 28030 Diet Cola Soda Base	Organic	10/20/2014
AF 28031 Low Carb Lemon Lime Soda Base	Ingredient Panel Only	10/20/2014
AF 28032 Diet Lemon Lime Soda Base	Organic	10/20/2014
AF 28041 Green Tea w/Honey Base	Made with Organic - 70-95% Organic	10/13/2014
AF 28042 Peach Black Tea Base	Ingredient Panel Only	10/13/2014
AF 28049 Black Tea Premix	Organic	10/13/2014
AF 28050 Green Tea Premix	Organic	10/13/2014
AF 28051 White Tea Premix	Organic	10/13/2014
AF 28052 Black Tea Mango Lemonade Base	Made with Organic - 70-95% Organic	10/20/2014
AF 28053 Green Tea Mint Lemonade Base	Made with Organic - 70-95% Organic	10/20/2014
AF 28054 White Tea Tart Cherry Lemonade Base	Made with Organic - 70-95% Organic	10/20/2014
AF 52896 Cola	Organic	10/27/2011
AF 52897 Cherry Cola	Organic	10/27/2011
AF 52898 Vanilla Cola	Organic	10/27/2011
AZ 21659 Pomegranate Green Tea Base	Made with Organic - 70-95% Organic	10/20/2011
AZ 21665 Pomegranate Green Tea Water Base	Made with Organic - 70-95% Organic  Made with Organic - 70-95% Organic	10/20/2008
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AZ 21766 Mandarin Green Tea Water Base	Made with Organic - 70-95% Organic	10/20/2008
AZ 21753 Green Tea Premix	Organic	10/20/2008
AZ 21754 Green Tea Premix	Made with Organic - 70-95% Organic	10/20/2008
AZ 21765 Yumberry Green Tea Water Base	Made with Organic - 70-95% Organic	10/20/2008
AZ 21768 Green Tea Water Premix	Made with Organic - 70-95% Organic	10/20/2008
AZ 21769 Yumberry Green Tea Base	Made with Organic - 70-95% Organic	10/20/2008
AZ 21829 Green Tea Premix	Organic	11/4/2008
Honey	100% Organic	9/10/2008
Sugar	Organic	4/22/2013

US/Canada Equivalency - Handler (Processor) (#12)

Carti	fication	Num	hor:

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## Official QAI Product Certification Listing

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#### Company:

#### **Citromax Flavors**

444 Washington Avenue Carlstadt, NJ 07072 USA

Show all certified products (#showAll) | Hide all certified products (#hideAll)

### **Facility Information:**

Facility #1: Citromax Flavors 444 Washington Avenue Carlstadt, NJ 07072 USA

#### **Certification Type:**

#### = NOP - Handler (Processor) (#11)

Certification Number: C0029867-NOPHPC-6

#### **Product Details:**

Product Name	Claim Description	Listed Date
Anise Extract (007184)	Organic	5/7/2013
Bergamot Extract (007182)	Organic	5/7/2013
Citral Ex Lemongrass (1408141)	100% Organic	8/14/2014
Citrus Extract (007268)	Organic	5/9/2013
Lemon Oil 5 Fold	100% Organic	4/11/2011
Lemon Oil 5 Fold Terpenes	100% Organic	4/11/2011
Natural Apple Flavor WONF (008863)	Organic	11/19/2013
Natural Apple Flavor WONF (Honey Crisp Type) (706826)	Organic	2/3/2014
Natural Apple Mango Flavor WONF (954887)	Organic	3/20/2012
Natural Banana Type Flavor (706331)	Organic	9/12/2012
Natural Berry Flavor WONF (470352)	Organic	10/22/2014

Natural Black Cherry Type Flavor (003183)	Organic	4/21/2011
Natural Black Cherry Type Flavor (705850)	Organic	9/12/2012
Natural Blackberry Flavor WONF (954884)	Organic	3/20/2012
Natural Blackberry Type Flavor (003187)	Organic	4/21/2011
Natural Blackberry Type Flavor (954238)	Organic	4/21/2011
Natural Blueberry Type Flavor (003188)	Organic	4/21/2011
Natural Cantaloupe Type Flavor (003184)	Organic	4/21/2011
Natural Chocolate Mint Type Flavor (003189)	Organic	4/21/2011
Natural Citrus F1avor WONF Extract (181264)	Organic	7/9/2008
Natural Coconut Type Flavor (003191)	Organic	4/21/2011
Natural Cucumber Flavor WONF (954888)	Organic	5/14/2012
Natural Furaneol, 15% in Organic Ethyl Alcohol	Made with Organic - 70-95% Organic	9/12/2012
Natural Grape Type Flavor (003185)	Organic	4/21/2011
Natural Honeydew Melon Type Flavor (003186)	Organic	4/21/2011
Natural Lemon F1avor WONF (792470)	Organic	1/21/2011
Natural Lemon F1avor (792469)	Organic	1/21/2011
Natural Lemon F1avor WONF (210620)	Organic	1/29/2009
Natural Lemon Flavor (007099)	Organic	6/3/2014
Natural Lemon Flavor (180671)	Organic	8/23/2006
Natural Lemon Flavor Extract (180338)	Organic	8/23/2006
Natural Lemon Flavor WONF (708996)	Organic	1/21/2014
Natural Lemon Flavor WONF (810048)	Organic	10/22/2014
Natural Lemon Lime Flavor WONF (003161)	Organic	4/11/2011
Natural Lime Flavor WONF (810049)	Organic	10/22/2014
Natural Lime Flavor WONF Extract (180711)	Organic	1/10/2007
Natural Mango Type Flavor (003162)	Organic	4/11/2011
Natural Mango Type Flavor (705844)	Organic	9/12/2012
Natural Methyl Thiobutyrate, 1% in Organic Ethyl Alcohol	Organic	9/12/2012
Natural Mojito Type Flavor (003167)	Organic	4/11/2011
Natural Orange F1avor WONF (792471)	Organic	1/21/2011
Natural Orange F1avor WONF (792472)	Organic	1/21/2011
Natural Orange Flavor WONF (003164)	Organic	4/11/2011
Natural Orange Flavor WONF (149429)	Organic	5/21/2014
Natural Orange Flavor WONF Extract (180754)	Organic	12/12/2006
Natural Organic Ginger Ale Type Flavor (709238)	Organic	5/6/2014
Natural Papaya Type Flavor (003193)	Organic	4/21/2011
Natural Passionfruit Flavor WONF (954882)	Organic	3/20/2012
Natural Peach Flavor WONF (003168)	Organic	4/11/2011
Natural Peach Flavor WONF (009019)	Organic	1/16/2014
Natural Peach Flavor WONF (182025)	Organic	3/10/2010
Natural Peach Flavor WONF (954236)	Organic	4/11/2011
Natural Peach Type Flavor (009477)	Organic	6/19/2014
Natural Pineapple Flavor WONF (955091)	Organic	5/14/2012
Natural Pomegranate Type Flavor (003165)	Organic	4/11/2011
Natural Pomegranate Type Flavor (009778)	Organic	6/19/2014
Natural Raspberry Type Flavor (003163)	Organic	4/11/2011
Natural Red Apple Type Flavor (003192)	Organic	4/21/2011
Natural Red Grapefruit Flavor WONF (810052)	Organic	10/22/2014
Natural Strawberry Type Flavor (003160)	Organic	4/11/2011
Natural Watermelon Type Flavor (003190)	Organic	4/21/2011
Orange Flavor/Orange Extract (460072)	Organic	10/2/2014
Orange Oil 5x	100% Organic	5/19/2014
Orange Oil 5x Terpenes	100% Organic	5/19/2014

 Peppermint Extract (007181)
 Organic
 5/7/2013

 Tangerine Oil
 100% Organic
 1/21/2014

US/Canada Equivalency - Handler (Processor) (#12)

**Certification Number:** 

♣ US/EU Equivalency -Handler (Processor) (#13)

**Certification Number:** 

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## Company:

**WILD Flavors, Inc.** 1261 Pacific Avenue Erlanger, KY 41018 USA

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### **Facility Information:**

Facility #1: WILD Flavors, Inc. 1261 Pacific Avenue Erlanger, KY 41018 USA

#### **Certification Type:**

#### = NOP - Handler (Processor) (#11)

Certification Number: C0030919-NOPHPC-6

#### **Product Details:**

Product Name	Claim Description	Listed Date
Acai Clarified Extract (Acai Palmberry Pulp)	Organic	1/29/2009
Acai Distillate	Organic	7/11/2013
Acai Distillate #2	Organic	10/4/2013
Acai Juice Blend	Organic	6/2/2010
Acerola Acai Juice Blend II	Organic	7/13/2009
Acerola Juice Concentrate	Organic	1/29/2009
Alcohol/Natural Triethyl Citrate Solution	Organic	6/13/2013
American Ginseng Extract	Organic	8/26/2010
Apple Juice Concentrate	Organic	3/3/2009
Banana Distillate	Organic	7/11/2013
Barley Flavor WONF	Organic	9/11/2012

Berry Flavor WONF	Organic	8/24/2012
Berry Flavor WONF (BI Forest)	Organic	8/24/2012
Black Carrot Juice	Organic	8/20/2013
Black Cherry Type Flavor	Organic	8/24/2012
Black Tea Powder	100% Organic	10/7/2008
Black/Purple Carrot Juice Concentrate	Organic	6/12/2009
Blueberry Distillate	Organic	5/3/2013
Blueberry Distillate #2	Organic	9/30/2013
Blueberry Flavor WONF	Organic	7/6/2012
Blueberry Juice Concentrate	Organic	8/25/2008
Blueberry Type Flavor	Organic	4/10/2012
Caffeine Extract	Organic	10/17/2014
Caramel Color	Organic	3/3/2009
Chamomile Distillate	Organic	7/11/2013
Chamomile Distillate #2	Organic	9/30/2013
Chamomile Extract	Organic	7/11/2013
Chamomile Extract #2	Organic	10/4/2013
Cherry Bark Extract	Organic	1/15/2014
Chicory Blend Flavor WONF	Organic	7/6/2012
Chicory Extract	Organic	7/11/2013
Chicory Extract #2	Organic	10/4/2013
Cinnamon Extract	Organic	7/11/2013
Cinnamon Extract #2	Organic	10/4/2013
Cocoa (Dutched) Distillate	Organic	11/15/2013
Cocoa Distillate	Organic	7/11/2013
Cocoa Extract	Organic	4/11/2014
Cocoa Liquor Distillate	Organic	7/11/2013
Cocoa Liquor Distillate #2	Organic	11/11/2013
Cocoa Nib Distillate	Organic	7/11/2013
Cocoa Nib Distillate #2	Organic	9/30/2013
Cocoa Nib Extract	Organic	7/11/2013
Cocoa Nib Extract #2	Organic	9/30/2013
Cocoa Powder	Organic	2/18/2009
Coconut Distillate	Organic	7/11/2013
Coconut Extract	Organic	3/26/2010
Concord Grape Juice Concentrate	Organic	5/17/2012
Cranberry Flavor WONF	Organic	8/24/2012
Crown Herbal System	Organic	10/17/2011
Crown Juice System	Organic	10/17/2011
Dandelion Root Extract	Organic	7/11/2013
Dandelion Root Extrat #2	Organic	11/11/2013
Dry Herbal Blend for Heart	Organic	10/17/2011
Dry Herbal Blend for Sacral	Organic	9/2/2011
Dry Herbal System for Throat	Organic	10/17/2011
Egyptian Rose Flavor	Organic	7/6/2012
Evaporated Cane Juice	Organic	6/2/2010
Exotic Juice Blend with Yumberry	Organic	12/8/2009
Fenugreek Extract	Organic	4/17/2013
Fresh Pineapple Flavor	Organic	11/21/2012
Fruit Punch	Organic	6/14/2012
Ginger Distillate	Organic	7/11/2013
Ginger Distillate #2	Organic	10/4/2013
Ginger Extract	Organic	4/17/2013
	-	

Goji Berry Extract	Organic	7/6/2012
Green Tea Powder	100% Organic	10/7/2008
Guarana Seed Extract	Organic	10/17/2014
Guarana Seed Extract 10%	Organic	7/13/2009
Guava Flavor	Organic	11/21/2012
Herbal Blend	Organic	12/30/2010
Herbal Blend for Root	Organic	10/17/2011
Herbal Blend for Sacral	Organic	9/2/2011
Herbal Coconut Blend	Organic	12/30/2010
Herbal System for Heart	Organic	10/17/2011
Herbal System for Throat	Organic	10/17/2011
Hibiscus Distillate	Organic	7/11/2013
Hibiscus Distillate #2	Organic	10/4/2013
Hibiscus Extract	Organic	7/11/2013
Hibiscus Extract #2	Organic	9/30/2013
Honey Distillate	Organic	3/6/2013
Juice Blend for Root	Organic	10/17/2011
Juice System for Heart	Organic	10/17/2011
Juice System for Throat	Organic	10/17/2011
Juicy Orange Flavor	Organic	4/10/2012
Lemon Flavor	Organic	7/6/2012
Lemon Flavor WONF	Organic	7/6/2012
Lemon Juice Concentrate	100% Organic	3/3/2009
Lemon Verbena Distillate	Organic	6/13/2013
Lemon Verbena Distillate #2	Organic	10/4/2013
Licorice Root Extract	Organic	7/11/2013
Licorice Root Extract #2	Organic	10/4/2013
Lime Juice Concentrate	Organic	1/29/2009
Maltodextrin	Organic	9/29/2009
Mango Distillate	Organic	7/11/2013
Mango Distillate #2	Organic	10/4/2013
Mango Flavor	Organic	11/12/2012
Molasses Distillate	Organic	4/17/2013
Molasses Distillate #2	Organic	10/4/2013
Mushroom Distillate #2	Organic	10/4/2013
Natural Acai Extract Flavor	Organic	2/20/2013
Natural Acai Juice Conc FL SD	Organic	9/6/2013
Natural Acai Type Flavor	Organic	1/13/2014
Natural Apple Flavor WONF Green Type	Organic	4/24/2013
Natural Apricot Type Flavor	Organic	7/24/2013
Natural Banana Flavor WONF	Organic	2/27/2013
Natural Banana Flavor WONF #2	Organic	3/6/2013
Natural Barley Type FL	Organic	6/13/2013
Natural Blackberry Extract	Organic	3/27/2013
Natural Blackberry Type Flavor	Organic	2/27/2013
Natural Blueberry Type Flavor #2	Organic	3/6/2013
Natural Blueberry Type Flavor #3	Organic	12/4/2013
Natural Boysenberry Type Flavor	Organic	2/20/2013
Natural Brown Rice Type Flavor	Organic	7/24/2013
Natural Butter Type Flavor	Organic	2/27/2013
Natural Buttermilk Type FL	Organic	6/13/2013
Natural Butterscotch Type Flavor	Organic	2/27/2013
Natural Caramel Type Flavor	Organic	3/27/2013

Natural Cardamom Flavor Extract	Organic	4/24/2013
Natural Chai Spice Flavor Extract	Organic	2/27/2013
Natural Chicory Blend Extract	Organic	10/4/2013
Natural Chocolate Flavor WONF	Organic	3/6/2013
Natural Cinnamom FL WONF	Organic	8/5/2013
Natural Cinnamon Brown Sugar Type Flavor	Organic	4/17/2013
Natural Cinnamon Flavor WONF	Organic	10/22/2013
Natural Citrus Flavor WONF	Organic	3/27/2013
Natural Cocoa Concentrate	Organic	6/4/2014
Natural Cocoa Extract Flavor	Organic	3/21/2013
Natural Cocoa Fruit Type Flavor	Organic	3/21/2013
Natural Coconut Type Flavor	Organic	12/21/2012
Natural Coconut Type Flavor #2	Organic	4/24/2013
Natural Coffee Flavor WONF	Organic	8/5/2013
Natural Coffee Type Flavor	Organic	8/5/2013
Natural Cola Flavor (PS)	Organic	3/27/2013
Natural Concord Grape Type Flavor	Organic	12/21/2012
Natural Concord Grape Type Flavor #2	Organic	12/21/2012
Natural Coriander Flavor WONF	Organic	7/24/2013
Natural Creamy Vanilla Flavor WONF	Organic	3/21/2013
Natural Dark Cherry Flavor WONF	Organic	12/21/2012
Natural Dark Chocolate Type Flavor	Organic	4/17/2013
Natural Dark Chocolate Type Flavor #2	Organic	10/4/2013
Natural Decadent Vanilla Flavor WONF	Organic	4/24/2013
	-	3/27/2013
Natural Dragonfruit Type Flavor	Organic	3/21/2013
Natural Earl Grey Type Flavor	Organic	9/6/2013
Natural Energy Berry Type FL DB  Natural Fennel Extract Flavor	Organic	3/6/2013
	Organic	7/24/2013
Natural Fengel Verilla Time Flavor WONF	Organic	
Natural French Vanilla Type Flavor	Organic	12/10/2013
Natural French Vanilla Type Flavor #2	Organic	12/4/2013
Natural Fruit Punch Type Flavor	Organic	3/21/2013
Natural Ginger Extract Flavor	Organic	3/21/2013
Natural Gojiberry Type Flavor	Organic	4/24/2013
Natural Grape Type Flavor	Organic	4/24/2013
Natural Grapefruit Flavor WONF	Organic	3/6/2013
Natural Green Tea Distillate WONF	Organic	9/6/2013
Natural Green Tea Flavor WONF	Organic	3/27/2013
Natural Honey Type Flavor	Organic	3/6/2013
Natural Honey Type Flavor #2	Organic	4/17/2013
Natural Honeysuckly Type FL	Organic	8/5/2013
Natural Huckleberry Type Flavor	Organic	3/21/2013
Natural Jasmine FL WONF	Organic	6/13/2013
Natural Jasmine Flavor	Organic	7/24/2013
Natural Kiwi Type Flavor	Organic	6/13/2013
Natural Lavender Flavor	Organic	12/21/2012
Natural Lavender Flavor #2	Organic	12/21/2012
Natural Lemon FL WONF Candy Type	Organic	6/13/2013
Natural Lemon Flavor #2	Organic	4/24/2013
Natural Lemon Flavor WONF #2	Organic	2/20/2013
Natural Lemon Flavor WONF #3	Organic	3/21/2013
Natural Lemon Flavor WONF #4	Organic	10/22/2013
Natural Lemon Lime Flavor WONF	Organic	3/6/2013

Natural Lemongrass Extract	Organic	11/8/2013
Natural Lime Extract Flavor	Organic	2/27/2013
Natural Lime Flavor WONF	Organic	12/21/2012
Natural Lime Flavor WONF #2	Organic	10/22/2013
Natural Mango Extract	Organic	1/13/2014
Natural Mango FI Wonf #3	Organic	1/13/2014
Natural Mango Flavor WONF	Organic	11/12/2012
Natural Mango Flavor WONF #2	Organic	7/24/2013
Natural Mango Type FL#2	Organic	6/13/2013
Natural Mango Type Flavor	Organic	4/24/2013
Natural Mango Type Flavor #3	Organic	5/28/2014
Natural Mangosteen Type Flavor	Organic	3/21/2013
Natural Maple Flavor WONF	Organic	2/20/2013
Natural Mint Key WONF	Organic	7/24/2013
Natural Minty Leaf Type Key	Organic	10/22/2013
Natural Mixed Berry Type Flavor	Organic	10/22/2013
Natural Orange Flavor WONF	Organic	2/20/2013
Natural Orange Flavor WONF #2	Organic	3/21/2013
Natural Papaya Type Flavor	Organic	6/13/2013
Natural Peach Flavor WONF	Organic	12/21/2012
Natural Peach Flavor WONF #2	Organic	12/21/2012
Natural Peach Flavor WONF #3	Organic	4/24/2013
Natural Peach Type Flavor	Organic	4/17/2013
Natural Pear Flavor WONF #2	Organic	4/24/2013
Natural Peppermint Flavor WONF	Organic	2/20/2013
Natural Rasberry FL WONF #2	Organic	8/5/2013
Natural Rasberry Type Flavor	Organic	2/20/2013
Natural Raspberry Flavor WONF	-	8/24/2012
	Organic	2/27/2013
Natural Ripe Banana Flavor WONF	Organic	
Natural Root Beer Type Flavor	Organic	2/27/2013
Natural Smoothing Flavor	Organic	6/13/2013
Natural Spearmint FL Extract	Organic	5/3/2013
Natural Spearmint FL Extract #2	Organic	9/6/2013
Natural Spearmint Flavor WONF	Organic	10/22/2013
Natural St. Johns Bread Extract #3	Organic	11/11/2013
Natural Strawberry FL WONF #2	Organic	8/5/2013
Natural Strawberry Flavor WONF	Organic	2/20/2013
Natural Strawberry Type Flavor	Organic	3/6/2013
Natural Sweet Basil Flavor WONF	Organic	7/24/2013
Natural Sweet Peppermint Type Flavor	Organic	7/24/2013
Natural Sweet Peppermint Type Flavor #2	Organic	10/22/2013
Natural Sweet Vanilla FL WONF	Organic	12/10/2013
Natural Toffee Type Flavor	Organic	8/5/2013
Natural Toffee Type Flavor #2	Organic	8/5/2013
Natural Tropical Punch Type Flavor	Organic	3/27/2013
Natural Vanilla Crème Type Flavor	Organic	4/17/2013
Natural Vanilla Flavor	Organic	2/20/2013
Natural Vanilla Flavor #2	Organic	3/6/2013
Natural Vanilla Flavor WONF	Organic	10/22/2013
Natural Whipped Cream Type FL	Organic	9/6/2013
Natural Wild Cherry Flavor WONF	Organic	2/20/2013
Olive Leaf Extract	Organic	3/27/2013
Orange Juice Concentrate	100% Organic	3/3/2009

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Passionfruit Juice Concentrate	Organic	3/3/2009
Peach Type Flavor	Organic	8/24/2012
Pear Distillate	Organic	7/11/2013
Pear Distillate #2	Organic	9/30/2013
Pear Flavor WONF	Organic	11/12/2012
Peppermint Distallate	Organic	7/11/2013
Peppermint Distallate #2	Organic	10/4/2013
Pineapple Distillate	Organic	12/4/2013
Pistachio Distillate	Organic	11/15/2013
Pomegranat Flavor	Organic	11/21/2012
Pomegranate Blueberry Juice Blend	Organic	5/11/2011
Pomegranate Distillate	Organic	5/3/2013
Pomegranate Distillate	Organic	7/11/2013
Pomegranate Distillate #2	Organic	10/4/2013
Pomegranate Juice Concentrate	100% Organic	10/7/2008
Pomegranate Type Flavor	Organic	8/24/2012
Pomegranate Type Flavor #2	Organic	2/20/2013
Rasberry Flavor	Organic	11/21/2012
Rooibos Tea Solids	100% Organic	10/2/2008
Rose Distillate	Organic	5/3/2013
Rose Distillate #2	Organic	9/30/2013
Rosemary Extract	Organic	7/11/2013
Rosemary Extract #2	Organic	9/30/2013
Sacral Juice System	Organic	9/2/2011
Solar Plexus Dry Blend	Organic	10/17/2011
Solar Plexus Herbal System	Organic	10/17/2011
Solvent Base 2005485	Organic	1/15/2009
Solvent Base 200717	Organic	2/29/2008
Solvent Base 2017861	Organic	6/14/2012
Solvent Base 580745	Organic	1/19/2009
Solvent Base 581044	Organic	1/19/2009
Solvent Base 581045	Organic	1/19/2009
Solvent Base 581406	Organic	1/19/2009
Spearmint Distillate	Organic	7/11/2013
Spearmint Distillate #2	Organic	9/30/2013
St. John's Bread Extract	Organic	7/11/2013
St. John's Bread Extract #2	Organic	10/4/2013
Stevia Powder	Organic	5/10/2013
Sunflower Oil, Refined	Organic	12/21/2012
Tangerine Type Flavor	Organic	9/27/2012
Tapioca Syrup	Organic	4/11/2014
Tea (Black) Distillate	Organic	5/3/2013
Tea (Black) Distillate	Organic	7/11/2013
Tea (Black) Extract	Organic	7/11/2013
Tea (Black) Extract	Organic	7/11/2013
Tea (Green) Distillate	Organic	3/27/2013
Tea (Green) Extract	Organic	7/11/2013
Tea (Green) Extract #2	Organic	10/4/2013
Tea (Green) Gunpowder	Organic	5/3/2013
Tea (White China) Extract	Organic	7/11/2013
Tea (White China) Extract #2	Organic	10/4/2013
Tea (White) China Distillate	Organic	5/3/2013
Tea Black Distillate #2	Organic	10/4/2013
	<del>J</del>	=3.0

Tea Black Extract #2	Organic	10/4/2013
Tea Green Distillate #2	Organic	10/4/2013
Tea White China Distillate #2	Organic	10/4/2013
Third Eye Dry Herbal Blend	Organic	10/17/2011
Third Eye Herb System	Organic	10/17/2011
Third Eye Juice System	Organic	10/17/2011
Vanilla Distillate	Organic	4/17/2013
White Tea Solids	100% Organic	8/20/2008
Yerba Mate 25% Polyphenols	Organic	10/19/2009
Yumberry Juice Concentrate	Organic	2/4/2009

US/Canada Equivalency - Handler (Processor) (#12)

**Certification Number:** 

♣ US/EU Equivalency -Handler (Processor) (#13)

**Certification Number:** 

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268 Doremus Avenue Newark, NJ 07105

## **UN 1197**

## EXTRACTS, FLAVORING, LIQUID,

## CLASS #3, PG III, FLAMMABLE LIQUID

## ORGANIC STRAWBERRY FLAVOR WONF #115989

DOM: 10/20/2014 USE BY: 10/20/2015

LOT# 14-0918-0

P.O.# 21688

Net: 55 lb "Organically grown and processed in accordance with the USDA National Organic Program"

Store in original container at 40-80 F. Protect from prolonged exposure to light, heat, air and moisture. Chemtrec Emergency #1800-424-9300



268 Doremus Avenue Newark, NJ 07105



UN 1197

EXTRACTS, FLAVORING, LIQUID,



## **ORGANIC ORANGE OIL #11144**

DOM: 05/30/2014 USE BY: 05/30/2015

LOT# 14-0614-0

P.O.# PO1112

Net: 35 lb "Organically grown and processed in accordance with the USDA National Organic Program"

Store in original container at 40-80 F. Protect from prolonged exposure to light, heat, air and moisture. Chemtrec Emergency #1800-424-9300



### PRODUCT SPECIFICATION

#### ORGANIC STRAWBERRY FLAVOR WONF #115989

## **Ingredient statement:**

All flavor ingredients contained in this product are approved for use in a regulation of the FDA or are listed as generally recognized as safe (GRAS) on a reliable industry list.

Non-flavor ingredients: ORGANIC AGAVE SYRUP, WATER, ORGANIC ETHYL ALCOHOL, NATURAL CITRIC ACID, NATURAL ASCORBIC ACID

**Description**: A clear red-brown liquid with characteristic aroma and taste.

Allergen: None

<u>Test</u>	<u>Method</u>	Spec Limits
Aroma/Flavor	Internal Method	Compare to Std
Specific Gravity@25°C	FCC Current Ed.	1.1110 - 1.1390
Refractive Index@20°C	FCC Current Ed.	1.4010 - 1.4290
pH @25°C (as is)	FCC Current Ed.	2.5 - 3.5

### **Recommended storage conditions:**

Store in original container at 40-80°F. Protect from prolonged exposure to light, heat, air and moisture.

**Shelf Life:** Product stored under the recommended conditions; 365 days.

Flash point (closed cup): 94°F (34°C)

Weight per gal: 9.38 lb







### Manufactured in the USA

268 Doremus Avenue, Newark NJ 07105 Tel (973) 589-1230 Fax (973) 589-0016 www.flavor.com



## PRODUCT SPECIFICATION

## ORGANIC ORANGE OIL CP #11144

**Contains:** Organic Orange Oil, Cold Press (Citrus sinensis L.)

**Description**: A clear yellow-orange liquid with characteristic aroma and taste.

Allergen: None

<u>Test</u>	<u>Method</u>	<b>Spec Limits</b>
Aroma/Flavor	Internal Method	Compare to Std
Specific Gravity@25°C	FCC Current Ed.	0.8400 - 0.8460
Refractive Index@20°C	FCC Current Ed.	1.4720 - 1.4770

## **Recommended storage conditions:**

Stored in original container at 40-80°F. Protect from prolonged exposure to light, heat, air and moisture.

**Shelf Life**: Product stored under the recommended conditions; 365 days.

Flash point (closed cup): 110°F (43°C)

Weight per gal: 7.03 lb







268 Doremus Avenue, Newark NJ 07105 Tel (973) 589-1230 Fax (973) 589-0016 <u>www.flavor.com</u>

Product Specification Version 2.1 Author: RRM Effective Date: 06/17/13 Expiration: 06/15/15

Appendix H





268 DOREMUS AVE.

## ORGANIC VANILLA EXTRACT 1-FOLD

CODE: IV-1160 GROSS WT. 43.0 LBS TARE WT. 3.0 LBS NET WT. 40.0 LBS LOT NO. 14VM381-0





268 DOREMUS AVE. NEWARK, NJ 07105

## ORGANIC VANILLA EXTRACT 1-FOLD

CODE: IV-1160 GROSS WT. 43.0 LBS TARE WT. 3.0 LBS NET WT. 40.0 LBS LOT NO. 14VM381-0





268 DOREMUS AVE. NEWARK, NJ 07105

## ORGANIC VANILLA EXTRACT 1-FOLD

CODE: IV-1160 GROSS WT. 43.0 LBS TARE WT. 3.0 LBS NWT WT. 40.0 LBS LOT NO. 14VM381-0

## INCORPORATED 268 DOREMUS AVE. NEWARK, N.J. 07105 (973) 344-8014

FAX: (973) 344-5880

## PRODUCT SPECIFICATION

## Organic Vanilla Extract 1-fold

## **Physical**

Odor/Taste: Characteristic of Vanilla

Appearance: Dark brown to blackish

brown opaque liquid with possibly a small amount

of sediment

Alcohol Content: Minimum= 35%

Vanillin Content: Minimum=.1000g/100ml(UV)

Specific Gravity @ 25°C: .9630 +/- .005

## **Contents**

The extractives of organic vanilla beans, organic ethanol, distilled water.

## Shelf Life and Storage

Vanilla is very stable and can be stored for long periods without affecting quality. On standing for lengthy periods, it is normal to develop sediment. This is perfectly acceptable. Optimum storage conditions would be in a cool and dry environment (60-70°F).

\*Certified Organic by: Oregon Tilth, Inc. (OTCO)

## Appendix H









