

## INS & OUTS OF INGREDIENT LABELING Flavor Naming on Front & Back Label

Flavor labeling rules are some of the most difficult regulations to decipher for food labelers. What's tricky is when strawberry pastries contain both strawberries and strawberry flavoring. Can the pastries be called "strawberry pastries"? What if the pastries do not contain actual strawberries but are flavored with strawberry? Does it matter if the flavoring is natural or artificial? What if the package depicts a dancing strawberry?

The requirement for listing flavors in the ingredient statement is relatively straightforward. There are specific definitions for "natural flavors" and "artificial flavors" in 21 CFR 101.22 which dictates the ingredient name to use.

The confusing part about flavor labeling for many is when the flavor is included in the product name and/or graphics. What matters is how the "characterizing flavor(s)" – that is, the primary recognizable flavor(s) – are conveyed in the product name and on the package. When a flavor is included in the product name or implied through a graphic, specific regulatory copy must accompany the flavor name in all locations on the package and be presented in at least half the type size of the flavor name. Read on to learn which regulatory copy is required for each of the common scenarios.

**Use of "flavored"** – Strawberry flavored pastry or Strawberry naturally flavored pastry

- Natural flavor is added; none of the characterizing ingredient is in the formula
- Natural flavor is added; some characterizing ingredient is in the formula, but not enough to independently characterize the flavor

**Use of "with other natural flavors"** – Strawberry flavored pastry with other natural flavors

- Natural flavors derived from multiple sources are added to enhance the characterizing flavor (for example: strawberries, raspberries and blueberries), and either none or not enough of the characterizing ingredient is in the formula

**Use of "artificial flavors"** – Strawberry artificially flavored pastry

- Artificial flavors are added to simulate or reinforce the characterizing flavor, with or without the characterizing ingredient in the formula
- Natural flavor not derived from the characterizing flavor name is added (natural raspberry flavor added, not strawberry flavor), and either none or not enough of the characterizing ingredient is in the formula

**Use of "natural and artificial flavors"** – Strawberry naturally and artificially flavored pastry

- Though not specifically dictated in the CFR, when artificial flavors are required in the name and natural flavor is also in the formula, it is a common industry practice to list both in the regulatory copy

**Use of actual ingredient name; does not require use of term "flavored"** – Strawberry pastry

- Characterizing ingredient is enough to independently provide flavor, even if natural flavor is added

NOTE: Often foods will contain flavors as sub-ingredients of recipe components. These may or may not affect characterizing flavor naming. A chocolate chip with artificial vanilla flavor used as a sub-ingredient in a chocolate chip cookie would not require "artificially flavored" in the chocolate chip cookie product name. However, a strawberry pastry that contains a strawberry artificially flavored dried cranberry ingredient would need to include "artificially flavored" in the strawberry pastry name.