What are Flavors according to the FDA?

The FDA defines Flavors as "substances added to impart or help impart a taste or aroma in food". The FDA defines categories of flavors, along with regulatory requirements for each. These include:

**Natural Flavors:** Contain only flavor components (juices, extracts, essences, essential oils, distillates) sourced from the named material ("namer")

- "Lemon Flavor, Natural"
  - Essential Oil of Lemon/Lemon Juice

**Natural Flavor WONF:** A Natural Flavor, with other natural flavors components not from named material

- "Lemon Flavor, Natural WONF"
  - Essential Oil of Lemon/Lemon Juice ("namer"),
  - With Other Natural Flavors (not source-specified) ("Lemony" - Citral, Linalool, Limonene; "Citrusy" - Citronellol, Terpineol, Neryl Acetate)

**Natural & Artificial Flavor:** Combination of Named source ("Namer"), Natural and Artificial flavor components

- "Lemon Flavor, Natural & Artificial"
  - Essential Oil of Lemon/Lemon Juice ("namer")
  - Natural and Synthetic Chemicals ("Lemony" - Citral, Linalool, Limonene; "Citrusy" - Citronellol, Terpineol, Neryl Acetate)
VOICE OF THE EXPERT:

NATURAL FLAVORS EXPLAINED

Lisa Cummins, Regulatory Affairs Manager

Let’s take a look at a Natural Flavor example:

Isoamyl Acetate is a flavor chemical that imparts a sweet, fruity, banana, pear odor and taste and is often used in fruit flavor formulations. It occurs naturally in many fruits, from apples to apricots, bananas, and more. However, the exact source of Isoamyl Acetate can vary due to available starting materials and manufacturing processes.

Since a single Natural Flavor chemical is often present in many different foods, the exact origin of a natural flavor chemical is not tied to a specific source. Therefore, provided the Isoamyl Acetate is produced per a process and from a source approved by the US FDA’s definition of Natural Flavor (21 CFR 101.22(a) (3)), it may be called a Natural Flavor.


Lisa Cummins, Regulatory Affairs Manager, joined McCormick FONA’s Regulatory Team in 2005. She works closely with our customers, helping navigate the increasingly complex food and flavor regulatory landscape. Lisa also is a member of the McCormick FONA Flavor University team of presenters.

What do you find most exciting about your role?
I love working with customers to “demystify” flavors and flavor regulations. Each customer interaction regarding regulatory questions is unique, and an opportunity to build understanding about our products and industry.

What are some benefits of flavors that today’s consumers and developers might not realize?
Not everything that is good for us tastes good. Protein powders, vitamins, OTC medications, and other health and wellness products can have bitter, metallic, and otherwise undesirable taste profiles. Flavor is the magic ingredient added to these challenging bases to deliver a product that consumers prefer and enjoy.

What advice do you have regarding natural flavors and organic and clean labels?
The USDA allows only Natural Flavors in Organic certified products; therefore, Natural Flavors can be foundational to clean label as well. Working with your flavor partner can help you meet label requirements as well as consumer taste expectations with natural flavors.

“Developers may often run into challenges as there is such variation in nature when it comes to food! The use of natural flavors in development can ease variations and allow for a consistent taste experience for the consumer.”

Understanding Natural Flavors is critical to your product development. We’ve got you covered.

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