

FFAANZ TECHNICAL COMMUNIQUE 11/01 – Q & A FLAVOUR CLASSIFICATIONS

Further to the circulation of FFAANZ Technical Communi ques 10/01 “Natural” and 10/02 “Flavour Definitions” , Members, Suppliers and Customers were invited to submit questions on these topics. The FFAANZ technical committee has reviewed each question and has given an opinion below.

1. Q. Is FSANZ likely to change labelling regulations for a “flavouring or flavour “ if so when ?

1. A. *It is our opinion and understanding that Food Standards Australia New Zealand (FSANZ) do not intend to include the new definitions into the Food Standards Code and as such there would be no change to labeling regulations for a flavouring or flavour.*

2. Q. Will flavour company specifications for flavours change for existing flavours.

2. A. *Yes - member companies will be changing specifications as and when they are due for review . This is a major administrative undertaking and will commence during 2011.*

3. Q. FFAANZ communique 10/02 indicated that Association members would support existing documentation with NI and artificial. What does this support mean and what is the significance of “2 years from April 2011” ?

3. A. *Documentation containing NI & Artificial classification issued before April 2011 will remain valid for 2 years. Two years was considered to be sufficient for association members to issue revised documentation for existing products with the new definitions. April 2011 is 6 months post issue of the PIF Form V4 used by many manufacturers.*

4. Q. If we as a company use a flavour and list “flavour” in the ingredients, will the change of definitions have any implications for us?

4. A. *No*

5.Q. If we as a company use a currently defined natural flavour and list as natural flavour will the change of definitions have any implications for us?

5. A. *No - the new product specification must indicate Natural flavouring substances and / or Natural flavouring complexes ONLY. If there are Thermal Process or Smoke flavourings present the “natural flavour” classification will become invalid.*

6. Q. Most flavours will contain carriers which may or may not be classified as natural – can natural flavouring substances or complexes include these carriers without declaration.

6. A. *Yes. Carriers are excluded from the flavouring.*

7. Q. Can a natural flavouring substance be sourced from any plant or animal origin and/or a number of sources?

7. A. *Natural flavouring substances can be sourced from any plant or animal but must comply with the full definition previously provided in communiqués 10/01 and 10/02.*

8. Q. Does a Natural Chicken Flavour need to be sourced from Chicken only or can it contain other natural Flavours?

8. A. *A natural chicken flavour can contain Natural flavouring substances and /or Natural flavouring complexes derived from sources other than chicken.*

9. Q. If FSANZ does not require inclusion of flavour definitions in labelling who will decide on whether label claims are acceptable?

9. A. *The new IOFI definitions are for flavour classification purposes only. They are NOT claims. Just as Natural, NI & Artificial flavours are for flavour classification purposes, they are not claims either. Label claims are the voluntary choice and sole responsibility of individual companies who need to take into account provisions of the Consumer Protection Act.*

10. Q. Can we as a company continue with a “No Artificial Claim” where no current definitions exist?

10.A. *A Label Claim is an individual company decision. The company needs to take into account whether such claims can be deemed as false or misleading to the consumer. These definitions are not regulated under Australian or New Zealand Food Law but need to take into account provisions of the Consumer Protection Act.*

11. Q. Can Smoke flavours and process flavours be classified as Natural?

11. A. No – they have their own classification

12. Q. Who will be monitoring the natural flavour claims made on packaging ?

12.A. *In terms of the Consumer Protection Act, the ACCC and delegated State authorities will investigate formal complaints where a claim is said to be misleading as per the current practice.*

Further enquiries can be made to FFAANZ by contacting the Association – details shown above (email preferred please).

2nd April 2011