

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 2b

CRD2

Original language only

CODEX COMMITTEE ON FOOD LABELLING –

Forty-fourth Session

Asunción, Paraguay, 16 – 20 October 2017

MATTERS REFERRED BY CAC AND OTHER SUBSIDIARY BODIES

(Matters outstanding from CCFL43

Revision of section 4.2.3.4 of the

General Standard for the Labelling Of Prepackaged Foods (CODEX STAN 1-1985))

Use of the terms flavour and flavourings in labelling

Considerations presented by the International Organization of the Flavor Industry (IOFI)

I. Background

1. After adoption of the Codex Guidelines for the Use of Flavourings (CAC/GL 66-2008) by the Commission it was realized that terms and definitions laid down therein were not the same as those used in the standards that address labelling of flavourings in business to business and business to consumer products.
2. The Codex Committee on Food Additives (CCFA) agreed at its 46th session to address the inconsistent terminology regarding flavourings in various Codex texts, including the standards related to the labelling of flavourings. The Committee elaborated on the issue by means of a discussion paper and electronic working group. At its 48th session the CCFA finally agreed to revise sections 4.1 c and 5.1 c of the *General Standard for the Labelling of Food Additives when sold as such* (CODEX STAN 107-1981) and to recommend to CCFL to consider the revision of section 4.2.3.4 of the *General Standard for the Labelling of Prepackaged Foods* (CODEX STAN 1-1985), taking into account the proposed revisions¹.
3. The Codex Committee on Food Labelling (CCFL) endorsed at its 43rd session the revision of section 4.1 c and 5.1 c of CODEX STAN 107-1981 (Rep16/FL para 22 i.) proposed by the 48th session of the CCFA and the Codex Alimentarius Commission (CAC) adopted the revision at its 39th session.
4. With respect to the revision of 4.2.3.4 of the *General Standard for the Labelling of Prepackaged Foods* (CODEX STAN 1-1985), the CCFL at the 43rd meeting discussed the matter and noted comments from some delegations, that (Rep16/FL para 18):
 - *Consistency between the two Codex standards was essential as they were closely interlinked; and such revision should take into account the recommendations of CCFA;*
 - *Establishing such consistency between the two standards needed careful consideration to avoid any negative impact that could arise from the removal of flexibility on the use of the term “flavour” and/or “flavourings”. Both terms are in use and are well understood by consumers, therefore there is a need to examine the impact of the removal of the term flavour from a consumer point of view;*
 - *The proposed draft revisions in CODEX STAN 107-1981 were expected to have no negative impact and CODEX STAN 107-1981 did not take into account the general understanding of the terms “flavours” and “flavourings” by consumers;*

and agreed to consider the recommendation by CCFA to revise section 4.2.3.4 of the General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985) at a future date after examining the likely impact of the proposed changes (REP16/FL para 22 ii.).

¹ REP16/FA, Paras 148 and 151.

5. This paper aims to examine the questions raised during the discussion at the 43rd session of CCFL by providing in section II detailed information about the development of terms and definitions during the drafting of the Codex Guidelines for the Use of Flavourings (CAC/GL 66-2008).
6. Furthermore, in section III the translation of the terms "flavouring" and "flavour" in other languages and the use of both terms in the market place is discussed with respect to business-to-business and business-to-consumer communication.
7. Qualifiers or categories of flavourings (e.g. natural, artificial) are discussed in the section IV and overall conclusions and options are investigated in the final section V.

II. Development of the Codex Guidelines for the Use of Flavourings

8. The Codex Guidelines for the Use of Flavourings (CAC/GL 66-2008) were developed more than a decade after JECFA had started in the 90ies on request of the Codex Committee on Food Additives and Contaminants (CCFAC)² with the systematic evaluation of chemically defined flavourings. Modern food risk assessment and risk management are science based and need to use clear and unambiguous terminology. It was realized during the preparatory discussions at CCFA that terms and definitions would need to be considered carefully as Codex language on food flavour and food flavourings was found inconsistent.
9. The terminology agreed eventually by CCFA reflected the risk assessment work of JECFA. At the time of the development of CAC/GL 66-2008 JECFA had evaluated more than 1500 chemically defined flavourings and a few natural flavouring complexes, using a basic assessment methodology that is also applied by other risk assessment bodies including EFSA and the US FEMA Expert Panel.
10. The guidelines and the discussions at CCFA did not focus specifically on communication and labelling issues. A simple reference to the Codex standards addressing labelling was included. (Section 6.0 of CAC/GL 66-2008).
11. As Codex members started to consider the Codex flavouring guidelines when drafting national regulations, it was realized more and more that several Codex texts referring to flavourings use different terminology which was understood as inconsistencies or even plain contradictions.

III. The terms *flavour* and *flavouring*

12. The Codex Guidelines for the Use of Flavourings (CAC/GL 66-2008) define *flavour* as a perception experienced by consumers of food whereas *flavouring* is a substance used to impart or modify flavour to food. Whereas flavour is a subjective impression, the flavouring is a product with a characteristic composition; it should be subjected to a safety assessment when added to food.
13. This definition and separation of terms was needed to clarify that the guidelines were addressing the use of safe flavourings in food, flavourings being substances which are used in combination i.e. in blends or mixtures to impart or modify flavour to food.
14. The question how a mixture of flavourings should be labelled when providing a specific flavour e.g. a strawberry flavour was not discussed during the development of CAC/GL 66-2008.

Discussion using the English language

15. The *Codex Guidelines for the Use of Flavourings* were, as many Codex draft texts, discussed in working groups "working in English only": discussions used and focussed on words and their meanings in the English language. The discussion did not take into account that food flavour perception is described using terms that may be translated only with difficulties into other languages.
16. Organoleptic perception of food involves two senses: taste and smell. Although receptors are separated anatomically, the signal processing results in one holistic impression of how food tastes and smells. However, many languages do not separate sharply between taste and smell; as an example, in the Swiss German dialect one verb "schmecke" is used for the smell of a food and its taste whereas standard German uses "riechen" to describe a food's smell and "schmecken" for its taste.

² CCFAC used to be in charge of both food additives and contaminants until the committee was split into the CCFA (Food Additives) and the CCCF (Contaminants in Food). Because CCFA inherited the sessions numbering of CCFAC, CCFA is used throughout the document.

17. When discussing “the general understanding of the terms “flavours” and “flavourings” by consumers” (REP16/FL, para 18) it needs to be taken into account that consumers read labels in their mother language, not in Codex English.
18. The following consideration explores the difficulties of using the terms flavour and flavouring in the three languages Codex Alimentarius originally started with.
19. Codex has defined flavour and flavouring in three languages in which the text of CAC/GL 66-2008 was adopted. The terms are the following

English	French	Spanish
Flavour	Arôme	Aroma
Flavouring	Aromatisant	Aromatizantes

20. A short translation exercise using the terms *flavour* and *flavouring* in the three main Codex languages outside of the Codex environment provides interesting observations.

Translation of flavour and flavouring in the European Union

21. The translations services of the European Union publish all terms that had to be translated into another of the various official languages in a comprehensive inter-institutional terminology database called IATE (= “Inter-Active Terminology for Europe”)³.
22. Searching in this database for a translation of the English term *flavour* into French and Spanish provided 152 hits, and the same search for *flavouring* yielded even 161 entries (searches performed on 2nd March 2017).
23. These are the agreed definitions in IATE for flavour, taste and aroma:

IATE ID	English	French	Spanish
1519432	Flavour	Saveur	Sabor
1199019	Taste	Goût, saveur	Gusto, sabor
1199009	Aroma ¹⁾	Arôme	Aroma

¹⁾ Not to be confused with *flavour* [IATE:1519432] or *taste* [IATE:1199019]
CODEX terms for flavour are greyed

24. For the term *flavouring* several entries in the IATE database provide a more heterogenic terminology:

IATE ID	English	French	Spanish
756147 (1987/2007)	Flavouring Food flavouring	Arôme Agent d'aromatisation	Aroma Agente aromatizante
46664 (1999)	Flavouring	Arôme Aromatisant Substance aromatique	Aromatizantes
127722 (1996)	Flavour Flavouring Flavour modifier Flavouring agent Flavouring substance	Aromatisant Agent de sapidité Matière aromatisante Agent d'aromatisation Substance aromatisant	Aromatizante Sustancia aromatizante
1203434 (2003) ¹⁾	Flavourings	Substances aromatiques	Sustancias aromáticas

¹⁾ Customs Tariff Notex CCD 23.07
CODEX terms for flavouring are greyed

³ <http://iate.europa.eu>

25. The European Union legislation on flavourings (Regulation 1334/2008) applies the following different concept for *flavouring*:

English	French	Spanish
Flavouring	Arôme	Aroma
Flavouring substance ⁴	Substance aromatisante	Sustancia aromatizante
Flavour precursor	Précurseur d'arôme	Precursor de aroma

26. The term *flavour* itself is not defined, only in a specific context such as flavour precursor. Due to the example, the terms *flavour* and *flavouring* are in French and Spanish represented by the same term *aroma* and *arôme*, respectively.

Translation by FDA

27. FDA provides industry guidance on food labelling in English and Spanish which allows comparing the practice in the US. In the guidance on Juices⁵ the following terms are used:

FDA English	FDA Spanish
Flavor	Sabor
Flavoring	Saborizante ⁶
Flavored	Saborizado

28. In this guidance a juice is used “for flavoring” and “as a flavor”, but a “flavor” is also an ingredient. This is in line with 21 CFR 101.22 which presents “flavor” and “flavoring” as equal alternative options. FDA does not separate flavouring and flavour.
29. In the Spanish version of the industry guidance one Q & A question asks how to declare natural or artificial flavourings. The reply states that the appropriate term is "saborizante", "saborizante natural" o "saborizante artificial".

Translation by Health Canada

30. The Canadian *Food and Drug Regulation*⁷ uses in English “flavour” and “flavouring” and in French “arôme” and “aromatisants”. In Section 10 the regulation differentiates between “flavour” as a property of a material from which a flavouring is extracted. In some cases, however, flavour seem to describe also the extracted substance from a raw material.
31. In a document that outlines consumers’ expectations for modernization of food labels, the English text says “Identify ... *flavours* without using ... vague terms such as natural or “artificial” and the French version states “*Désigner ... les aromatisants sans recourir à ... des termes vagues, par exemple naturel ou artificiel*”.

Current practice in the market place

32. Concentrates of flavourings that impart a flavour to food are a niche consumer market that allows to understand the current practice of companies for labelling of products that are sold to the ultimate consumer. The information in the following table was obtained from an international online shopping platform.

Example	Product name on label	Description	Ingredients
1	Caramel flavor	Concentrated food flavouring oil which adds a natural taste of caramel to a variety of products	Natural and artificial flavor

⁴ According to the Mercosur Technical Regulation N°10/06 concerning flavourings the following terms are considered synonymous: aromatizante/saborizante (Spanish) and flavouring (English)

⁵ <https://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm064872.htm>

⁶ The IATE database offers for «sustancia saborizante» in English «appetising substance»

⁷ http://laws-lois.justice.gc.ca/eng/regulations/C.R.C.,_c._870/page-1.html

2	Arôme alimentaire Tutti Frutti (food flavour)	A very strong flavouring ... only need a few drops dependant on the strength of flavour you require	Flavourings
3	Concentrated flavour Jasmine	Highly specialised, concentrated flavourings	Not given
4	Concentrated Coconut Flavouring Essence	Coconut flavoured essence	Not given
5	Raspberry Natural Flavouring	Natural raspberry flavour	Natural raspberry flavouring with other natural flavourings

33. Products that are used to flavour food are called flavours or flavourings; in practice both terms seem to work and to convey the same message to consumers. Although the search for examples was done in English only, similar results will be retrieved for other languages.

Preliminary conclusions

34. The entries in IATE for flavour, taste and aroma (see para 23), the US FDA practice, the approach by Health Canada, and the practice in the market place indicate that the real-life use of the English words *flavour* and *flavouring* and their French and Spanish translations does not correspond to both terms as defined by the Codex Guidelines for the Use of Flavourings (CAC/GL 66-2008). Furthermore, as in many languages, also in English the term *flavour* is sometimes used as a synonym for *flavouring* which is, in the case of FDA, even laid down officially.
35. The definition of *flavour* as laid down in Section 2.1 of the Codex Guidelines for the Use of Flavourings (CAC/GL 66-2008) falls short of covering all aspects of the taste of food. Notably the primary intention of Section 2 was to separate between the substances that are used to impart flavour to food and which are subjected to risk assessments, and their property to impart flavour to food.
36. It is appropriate to request for flavourings sold as such - which are used to flavour food – that the labelling term *flavouring* is used in order to assure commercial users that the substance or mixture is in compliance with safety and quality requirements for flavourings and may be used safely in accordance with the Codex Guidelines for the Use of Flavourings (CAC/GL 66-2008).
37. It is not evident that Codex needs to be prescriptive for the terms flavour / flavouring when addressing labelling of consumer products. One may also accept different terms as long as they convey the same understanding of a product and its use.
38. Discussions at Codex may have to respect these difficulties and may express a warning message that use of agreed terms in Codex languages does not preclude members from deviating in national legislation. Such differences in national language should be assessed properly as they could result in technical barriers to trade.

IV. Qualifiers for flavourings

Categories/qualifiers for flavourings – their history at Codex

39. Flavouring substances have been differentiated by Codex Alimentarius with respect to their presence in nature and their origin. The concept of being present in foods or in nature was, in pre-risk analysis times, a simple approach that allowed to communicate that a substance was in principle not alien to food, it was e.g. not misleading consumers etc. This classification, distinguished between “natural”, “nature-identical” and “artificial” flavourings.
40. At its 3rd session the CCFA embarked on a first discussion of flavourings which was based on a note prepared by the US delegation (para 17; ALINORM 66/12). In view of the large number of compounds, it was agreed to develop a negative list approach as an interim agreement until more information was available about the toxicological evaluation of flavouring compounds. It was also decided, not to discriminate between natural flavouring compounds and identical synthetic flavouring compounds. General advice by JECFA was requested, and for three flavourings the evaluation of acceptable daily intake levels by JECFA was asked.

41. At the 4th session CCFA temporarily endorsed for use in margarine flavouring components, which occur naturally in foodstuffs, and identical synthetic components (para 8; ALINORM 68/12). This decision was the first application of the non-discrimination principle.
42. At the 5th session (ALINORM 69/12) CCFA replied to a question from CCFL that it would normally not be possible to make a scientific distinction between *natural* and *artificial* colours and flavours. At this session, the committee temporarily endorsed the use of natural flavourings and their identical synthetic equivalents in quick (deep) frozen foods (draft standard under development).
43. The principles to be applied by Codex to flavourings were agreed at the 6th session of CCFA in 1969 (para 22-25; ALINORM 70/12).
44. *Natural flavours and their identical synthetic equivalents* would be temporarily endorsed, unless an ADI had been established for a particular substance, in which case a full endorsement of that substance could be made. Those substances known to represent toxic hazard would be excluded.
45. For *flavours* other than natural flavours and their identical synthetic equivalents a toxicological examination by JECFA was necessary. Until such an evaluation was available, these substances could be temporarily endorsed insofar as they appeared on the Council of Europe list or other official lists.
46. For several standards from the Codex Committee on Fats and Oils (CCFO) these principles were applied to, the agreed wording addressing use of flavourings was "*natural flavours, as defined in the Codex Alimentarius, and their identical synthetic equivalents, and synthetic flavours appearing in the permitted Codex list*".
47. While agreeing on this wording the CCFA identified the need for a definition of *natural flavours* and agreed to examine the Council of Europe's definition at the next meeting.
48. After some inconclusive discussion at the 7th session, the 8th session of CCFA considered and agreed on the following definitions (para 59; ALINORM 72/12):
 - "Natural flavours and flavouring substances are preparations and single substances respectively, acceptable for human consumption, obtained exclusively by physical processes from vegetable, sometimes animal, raw materials, either in their natural state or processed for human consumption.*
 - Nature-identical flavouring substances are substances chemically isolated from aromatic raw materials or obtained synthetically; they are chemically identical to substances present in natural products intended for human consumption, either processed or not.*
 - Artificial flavouring substances are those substances which have not yet been identified in natural products intended for human consumption, either processed or not."*
49. At its 9th session the CCFA agreed not to develop an own comprehensive list of flavourings but to refer to the list developed by the Council of Europe as JECFA at its 17th meeting had accepted the procedures applied by the Council of Europe as a "useful and practical first approach" (paras 18-20, ALINORM 74/12). Controversy remained whether only artificial flavourings or all flavourings including natural and their equivalents should be regulated by a positive list.
50. At the 10th session the CCFA reconfirmed its previous decision from the 8th session to group flavours and flavouring substances into three categories, i.e. (a) natural flavours and flavouring substances; (b) nature-identical flavouring substances; and (c) artificial flavouring substances (ALNORM 76/12).
51. The *General Standard for the Labelling of Pre-packaged Food* (CODEX STAN 1-1985) contained at the beginning as ingredient category only "flavour(s)". During the discussion of the revision of this standard the CCFL agreed at its 16th session to add the following text (para 149; ALINORM 83/22):
 - "The expression "flavours" may be qualified by "natural", "nature identical", "artificial" or a combination of these words as appropriate."*
52. Although there was not full consensus at that session this proposal was eventually adopted.
53. The brief historical description shows that the categories of flavourings were agreed by the CCFA based on a pragmatic temporary agreement how to assess and manage risks of food flavourings. At least for the chemically defined flavourings which are natural, nature-identical, or artificial, this temporary agreement was replaced by the flavouring evaluation program by JECFA followed by the de-facto adoption of a comprehensive positive list of food flavourings by Codex.

54. It was therefore appropriate to reconsider the definitions agreed by the 8th session of CCFA (cf. paragraph 48 of present document) when discussing the Codex guidelines for food flavourings.

Categories used in the Codex Guidelines for the Use of Flavourings (CAC/GL 66-2008)

55. The discussion of the terms to be used for flavouring categories reflected JECFA's risk assessment approach for food chemicals: the origin of a food chemical is an important but not decisive fact in risk assessment. In view of the numerous naturally occurring toxic compounds, the natural presence or origin of a substance is no qualification for any waiver with respect to the requirements for a risk assessment. JECFA agreed to request less or even no toxicological testing only for a very limited group of substances which are extracts from food. Those may be acceptable if used at levels which lead to consumer intakes that are similar as food. As food constitutes only a part of nature, the terms "occurs significantly in food" is different from "occurs in nature".
56. At the time of the development of the flavourings guidelines JECFA had already evaluated more than 1500 chemically defined flavourings and a few natural flavouring complexes, using a basic methodology that is also applied by EFSA and the US FEMA Expert Panel. In general, the criteria of "natural", "nature-identical", "artificial" are irrelevant for the work of any of these expert bodies.
57. The three terms used for labelling were not consistent with the flavouring categories relevant for risk assessment; as the flavourings guidelines were intended to be risk-based they referred rather to the risk assessment principles and methods as they are applied by JECFA and agreed between JECFA and CCFA.
58. Therefore, the current categories of "flavouring substances", "natural flavouring complexes" and "smoke flavourings" were introduced, and the first category, the flavouring substances, was split into "natural" and "synthetic" with the understanding that "nature-identical" would be part of the latter.
59. For labelling purposes, the CCFA agreed to the language that is now laid down in sections 4.1 c and 5.1 c of the *General Standard for the Labelling of Food Additives when sold as such* (CODEX STAN 107-1981. Revision 2016):

"... the generic expression may be qualified by the words "natural" in the case of natural flavourings as defined in CAC/GL 66-2008, "artificial" in the case of synthetic flavourings as defined in CAC/GL 66-2008, or a combination of these words, as appropriate"

and accepted thereby the categories also as qualifiers for labelling of flavourings on business-to-business products (BtoB).

Qualifiers for flavourings on pre-packaged food labels

60. The question remains what qualifiers should be permitted for flavourings when used on business-to-consumer (BtoC) pre-packaged food products?
61. Important is that a risk-based regulatory terminology, when translated into language used for consumer products labelling, should be transparent with respect to the risk assessment and be well understood by consumers. It may include other nuances than those based on risk assessment such as of organic production, life-style etc.
62. It would therefore be possible to accept different qualifiers for labelling of flavourings/flavours on BtoB and BtoC products. The difference between both approaches could be that BtoC qualifiers would cover a broader range of terms including those laid down in the Codex flavourings guidelines and agreed for BtoB.
63. As an example, if "nature-identical" provides information that is of value to consumers and their understanding of a food and its ingredients, it may be an acceptable term, provided it does not convey a message that contradicts the fact that the term is not risk based.
64. The Codex Guidelines for the Use of Flavourings use the category "synthetic" which, according to CODEX STAN 107-1981(Rev 2016) shall be labelled on BtoC products as "artificial" whereas the current Codex food labelling still separates "artificial" from "natural" and "nature-identical".
65. As discussed above for the terms flavour/flavouring, a more profound linguistic/hermeneutic analysis of the meanings of these terms in English and in other languages would be needed to understand the implications of using "synthetic", "artificial" rather than of "nature-identical" on BtoC labels.
66. As an example, the term "synthetic vanillin" may convey in consumers' minds two concepts: first, that of a "true" vanillin produced by chemical synthesis; second that the molecule is different to vanillin but provides

the same flavour as vanillin (e.g. ethyl-vanillin). The term nature-identical clarifies that the first concept is the one intended, the term artificial indicates that the first or the second concept is meant.

67. There are legislations which demand identification of artificial flavouring substances as they are considered to be food additives which need to be listed as ingredients in the food label (e.g. ethyl vanillin). They need to be listed with function and name. For natural and nature-identical flavourings this identification is not required. Whether such a solution is compatible with a risk-based approach for food regulations is questionable.

Preliminary conclusions

68. Labels or regulatory technical documents of BtoB products shall provide sufficient information for the user to determine how these products need to be labelled on BtoC foods. This would speak in favour of aligning Codex labelling texts for both product categories.
69. The development of the terms/categories for flavourings by Codex was always based on agreements how to assess and manage their risks when added to food. With the joint work of JECFA and CCFA since 1996/97 this approach was revised and eventually reflected in the guidelines developed ten years ago.
70. Using the definitions and categories from CAC/GL 66-2008 for labelling of pre-packaged foods may face difficulties as the terms "natural", "nature-identical", "synthetic", "artificial" convey possibly conflicting messages which are difficult for consumers to understand.
71. A more detailed discussion may be needed to assess the impact of referring in the standard for the labelling of pre-packaged foods to the definitions and categories of the Codex flavouring guidelines.
72. This discussion should aim at clarifying whether terms that reflect the risk assessment of flavourings are suitable for labelling, or whether consumers expect information from a food label that is not relevant to risk assessment such as the distinction between natural and nature-identical.

V. Overall conclusions and options

73. Labelling of food ingredients shall be understood easily by consumers and shall be congruent with the risk-based assessment and management that assures safe use of food ingredients including flavourings.
74. The entry for section 4.2.3.4 of *General Standard for the Labelling of Prepackaged Foods* (CODEX STAN 1-1985) reads currently as follows:

The following class titles may be used for food additives falling in the respective classes and appearing in lists of food additives permitted generally for use in foods:

- *Flavour(s) and Flavouring(s)* • *Modified Starch(es)*

The expression "flavours" may be qualified by "natural", "nature identical", "artificial" or a combination of these words as appropriate.

75. With respect to the terms "flavour" and "flavourings" all arguments presented above in Section III speak in favour of staying with the current text as in practice both terms are used to convey the same message: that a product contains added safe flavourings that impart a specific flavour.
76. For the qualifying expressions three options are possible which reflect at different levels the balance between the demand of consumers for information they expect and look for, and the need to communicate in line with the risk-based approach of modern food safety systems.
77. Option I: *The expression "flavour(s)" and "flavouring(s)" may be qualified by the words "natural" in the case of natural flavourings as defined in CAC/GL 66-2008, "artificial" in the case of synthetic flavourings as defined in CAC/GL 66-2008, or a combination of these words, as appropriate.*
78. This version aligns with the CODEX STAN 107-1981 as revised last year (2016) and encourages consistent communication along the food chain.
79. Option II: *The expression "flavour(s)" and "flavouring(s)" may be qualified by the word "natural" in the case of natural flavourings as defined in CAC/GL 66-2008.*
80. As discussed in section IV, risk assessment of flavourings by JECFA does not differentiate due to route of manufacturing or origin. Using the term "natural" on consumer labels is associated with issues that are not related to risk and safety of flavourings as, in accordance with the Codex Guidelines for the Use of Flavourings, only safe flavourings may be used.

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81. Option III: *The expression "flavour(s)" and "flavouring(s)" may be qualified by the words "natural" in the case of natural flavourings as defined in CAC/GL 66-2008, "artificial" or "nature-identical" in the case of synthetic flavourings as defined in CAC/GL 66-2008, or a combination of these words, as appropriate.*
82. As synthetic, artificial, and natural-identical may convey messages and nuances that are difficult to translate, this version would allow for flexibility. It should be stressed that also in this case all flavourings, irrespective of their qualifier, are safe and that there are no differences between these whatever qualifier is used.