

EFFCA position on the labelling term 'natural' for food cultures

It is our opinion that microbial food cultures are considered as natural and when used in food applications, the addition of cultures would enable the manufacturer to label with 'made with natural ingredients'. Currently there are no official regulations for determining whether a food ingredient can be labelled with the term 'natural'. However, in the absence of such specific rules there are several guidelines or rules from other food categories that could be taken into account.

To determine whether cultures would be considered 'natural' we will first find out if cultures and therefore a fermentation process in itself are considered 'natural' and then whether any subsequent processes could be considered as 'natural'.

UK FSA Criteria for the use of the terms fresh, pure, natural, etc. in food labelling

A very widely used standard is the [UK Food Standards Agency's 'criteria for the term natural in food labelling'](#). The FSA indicates that fermentation cultures usage is well understood, and is therefore acceptable in 'natural' products, subsequently it also indicates that 'fermentation is itself a natural process but subsequent processes may disqualify the final product from the description 'natural' unless appropriately qualified. Moreover, the paper continues stating that other processes such as non-traditional fermentation processes are not in line with current consumer expectations of 'natural'. Therefore, we can conclude that the uses of traditional (non-GM) cultures are considered 'natural' by the FSA.

EU Definition of the term 'natural' under Regulation (EC) No 1334/2008 on flavourings

The [EU Flavouring Regulation](#) indicates that 'a substance obtained by appropriate physical, enzymatic or microbiological processes from material of vegetable, animal or microbiological origin either in the raw state or after processing for human consumption by one or more of the traditional food preparation processes listed' can be labelled as natural. Subsequently the Regulation gives a list of processes that can be used in the production of natural substances as they are considered as 'traditional food preparation processes'. This list includes for example: fermentation, microbiological processes, drying and freezing.

Therefore, we can conclude that also in the EU fermentation processes and therefore cultures are considered 'natural', in addition the possible subsequent processes such as drying and freezing are also considered as 'natural'.

Canadian Food Inspection Agency guide food labelling and advertising

A [Canadian Food Inspection Agency guide to food labelling and advertising](#) has been published, the section on composition, quality, quantity and origin claims covers the term natural. The guidance indicates that 'foods or ingredients of foods submitted to processes that have significantly altered their original physical, chemical or biological state should not be described as 'natural', subsequently it lists a large number of processes affecting the natural character of foods with a *minimum* of physical, chemical or biological changes, which would therefore assumingly be allowed in 'natural' foods or ingredients. This list covers

fermentation using micro-organisms. Therefore, the use of cultures is considered as 'natural' by the Canadian FIA guidelines.

Food Standards Australia New Zealand user guide on representations about food

A [Food Standards Australia New Zealand user guide](#) was developed, which contains the same text as the Canadian guideline; therefore also here we can conclude that cultures can be considered as 'natural'.

French DGCCRF information note on use of the labelling term natural on foodstuffs

In this [French guideline on natural](#) it is also indicated that fermentation using micro-organism cultures when this process is inherent to the manufacture of an everyday consumer product is also considered as natural. The paper indicates some processes that would result in foodstuffs losing the benefit of the promotion of their natural character, such as freeze-drying, reverse osmosis and ultra filtration. In addition, additives may be incorporated, provided that they meet the indicated criteria as well (use of processing aids is not discussed either). It is mentioned that the nature of a flavouring medium is not taken into consideration as the definition of natural flavouring is set out in the EU flavouring Regulation. However, nowhere does the paper mention how to consider the fermentation medium for micro-organism cultures. For that reason, we also conclude that cultures could be considered as 'natural' in France.

United States Department of Agriculture food standards and labelling policy book

The [USDA guidance on 'natural' claims](#) is for meat and poultry products, but in the absence of something that refers to all food ingredients we can use it as a reference. The guidance indicates that the product and its ingredients should not be more than minimally processed, they continue saying that minimal processing may include fermenting. Consequently, we conclude that cultures could also in the US be considered 'natural' when applying the USDA perspective.

Therefore in general we can conclude that a product containing cultures can be labelled as 'made with natural ingredients' as the addition of cultures is not always essential for the production of a consumer food product, and often also simply as 'natural' when the use of the culture is essential for the production (e.g. fresh cream or yoghurt).

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About EFFCA The European Food & Feed Cultures Association - EFFCA - was formed in 1992 with the objective of enhancing public knowledge of the use of microbial cultures within the food chain through accurate, fair and scientifically based information. EFFCA represents sixteen manufacturing companies accounting for more than 95% of the microbial food cultures, including probiotics, sold in Europe.