

TECHNICAL BULLETIN 2013-1

Misconceptions Regarding "Natural" Food Colors in the United States

All color that is approved for use in human food products sold in the United States must fall into one of the following two categories:

- 1) Color which is **Subject to Batch Certification by the FDA**
Commonly known as "Certified", "FD&C" or "Artificial" Color.
- 2) Color that is **NOT Subject to Batch Certification by the FDA.**
Commonly (but incorrectly) known as "Natural" Color.

1) CERTIFIED FOOD COLORS

Each batch of this category of color for use in food, drug or cosmetic applications in the United States must be submitted to the Food and Drug Administration (FDA) for "Certification" to insure that it meets the government's stringent purity standards. Hence the term "**Certified Color**". The initials "**FD&C**" means these colors are generally approved for use in **Foods, Drugs, and Cosmetics**. The complete list can be found at <http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfctr/cfrsearch.cfm?cfrpart=74>

2) SO CALLED "NATURAL" FOOD COLORS

Colors in this category are generally derived from vegetables, fruits, spices and minerals. A few examples are Beet Juice, Red Cabbage, Grape Juice, Turmeric Paprika and Titanium Dioxide. The FDA has a relatively short and very specific list of non-Certified ingredients which can legally be used as food color in the United States (see CFR Title 21, Part 73, Subpart A). The complete list can be found at: <http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfCFR/CFRSearch.cfm?CFRPart=73>

It is important to note that, in the United States there is no legal FDA approved definition of "Natural" with reference to food or food ingredients. **In addition, the FDA considers any ingredient added to a product to intentionally change the color of that product to be an "Artificial Color", even if that ingredient is considered "Natural".**

As a result, using the term "Natural Color" on a product ingredient statement is not permitted in the USA!

Example:

Let's say you are producing a strawberry candy made with real strawberries. If you have "strawberries" on your ingredient label, and you have not added anything to the product to intentionally alter the shade, then you would not need to have any "color related" statement because the color is coming from the strawberries themselves.

Now, let's assume that your marketing people tell you that they need the product to be "redder", so you add a touch of Beet Juice to the product to accomplish that.

Labeling "Natural" Colors on Finished Food Products

Even though one might consider the Beet Juice in the above example to be "Natural", as far as the FDA is concerned, you have "artificially" colored the candy. Thus, to be in compliance with FDA regulations, your labeling needs to follow **21CFR 101.22**.

<http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfctr/cfrsearch.cfm?fr=101.22>

- a) "**Artificial Color**" or "**Artificial Color Added**" or "**Color Added**"
or by an equally informative term that makes clear that a color additive has been used in the food.
- b) "**Colored with** " _____ " or " _____ **color**".
the blank to be filled with the name of the color additive listed. In the above example, Beet Juice.