

UK GUIDANCE ON PICTORIAL REPRESENTATION RELATING TO FLAVOURINGS AND INGREDIENTS THAT DELIVER FLAVOUR



In partnership with

the **UK** flavour
association

Food and Drink
Federation



Delivering Sustainable Growth

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TERMINOLOGY

For the purposes of this guidance document:

- **Depiction** = pictorial representation.
- **Ingredient** = any substance or product and any constituent of a compound ingredient, used in the manufacture or preparation of a food and still present in the finished product even if in an altered form. For the purpose of this guidance flavourings, food additives and enzymes are not considered ingredients.
- **Flavourings** = products which are not intended to be consumed as such, which are added to food in order to impart or modify odour and/or taste. The categories of flavourings are set out in section 3. This does not preclude the use of the term flavourings in the ingredients list to cover all categories of flavourings.
- **Wholly or mainly** can be interpreted in different ways but as a guide at least 51% weight/weight of the flavouring components of the flavouring should come from the depicted source. When determining the % from the named food (FTNF) only the flavouring components are considered not the carrier or additives used to formulate the flavouring.

FOREWORD

The Department for Environment, Food and Rural Affairs commends the Food and Drink Federation and its supporting partner the UK Flavour Association for their work to provide industry guidance about pictorial representations on food labels. It is important that the approach is consistent to maintain current industry practices where these are in accordance with the law. This approach enables consumers to be fully informed and to prevent them being misled about the composition of the food they buy.

Sarah Church,

Director, Food and Farming
Department for Environment,
Food and Rural Affairs.



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BACKGROUND

The previous 1996 UK Food Labelling Regulations (SI 1996/1499), schedule 8, part 1 (which has been repealed by the UK Food Information Regulations 2014) stated that:

- A pictorial representation of a food which is such as to imply that the food to which the representation is applied has the flavour of the food depicted in the representation.

- Shall not be applied to any food unless the flavour of the food to which the representation is applied is derived wholly or mainly from the food depicted in the representation.

In addition the Food Standards Agency guidance notes on the Food Labelling Regulations 1996 stated:

63.2 Conditions are set out for the use of descriptions or pictorial representations on food labels which imply that a food has the flavour of the food named in the description. It should generally be taken that consumers will assume that the flavour of a food is obtained from the named food in the description, rather than a flavouring, unless the labelling makes clear that this is not the case.

63.4 It should be borne in mind that a pictorial representation of a food, implying that it has the flavour of that food, cannot be used unless the flavour comes wholly or mainly from the food in the picture. Even if the illustrated food cannot be tasted in the product as consumed, provided the flavour of the illustrated food comes wholly or mainly from that illustrated food (rather than, for example, an artificial flavouring), there is no reason why a picture of it should not appear on the product label.

63.5 A fruit drink containing orange, mango and passion fruit juices may illustrate all three fruits on the label, even if one or two flavours dominate, provided all three flavours come wholly or mainly from the fruits which are illustrated. In the same way, Indian tonic water with a twist of lemon would only be able to carry a picture of a lemon on it if the lemon flavour comes wholly or mainly from lemons.

63.6 Since the controls require that the flavour comes wholly or mainly from the illustrated food, this does not prevent the use of illustrations on product labels where the flavour has been mixed with small amounts of synthetic flavouring. In such a case, the flavour must still come wholly or mainly from the illustrated food.

CURRENT LEGISLATION

Article 7 of Regulation (EU) No 1169/2011 on the provision of food information to consumers which entered into force in October 2011 and applied from 13 December 2014 states:

Fair information practices

1. Food information shall not be misleading, particularly:
 - (a) as to the characteristics of the food and, in particular, as to its nature, identity, properties, composition, quantity, durability, country of origin or place of provenance, method of manufacture or production;
 - ...
 - (d) by suggesting, by means of the appearance, the description or pictorial representations, the presence of a particular food or an ingredient, while in reality a component naturally present or an ingredient normally used in that food has been substituted with a different component or a different ingredient.

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INDUSTRY PRACTICE

It is the responsibility of the food manufacturer to ensure that their product labelling conforms to legislative requirements of EU Regulation No. 1169/2011 and is not misleading to the consumer.

Broadly the UK industry applies the following general principles:

Ingredients	Flavourings	Pictorial Representation
Present	Not present	Permitted (<i>see Section 1</i>)
Present	Present	Permitted as long as the taste is derived wholly or mainly from the depicted food (<i>see Section 2</i>)
Not present	Present	Permitted as long as the taste is derived wholly or mainly from the depicted food (<i>see Section 3</i>)

The general principles should be applied to each ingredient and each flavouring separately. The general principles only apply to depiction of ingredients or flavourings used in the product recipe. Very minor ingredients used in the product recipe but not necessarily present in each individual product can still be depicted e.g. whole chillies in a jar of pickles. Pictorial representation of a food used to illustrate a flavour clearly identified as such in the name of the food when the product would not be expected by a consumer to contain the food depicted may be acceptable provided that it can be demonstrated not to mislead e.g. squirrel flavour crisps in the context of a competition to invent a new flavour or Cherry Bakewell flavour milkshake. Stylized chillies to indicate heat are outside the scope of these principles.

Section 1: Food Ingredients on their own

This section of the guidance is for use when food ingredients on their own are used to impart a flavour to a food.

1. Food Ingredients on their own

Depiction should be allowed as long as it is not misleading the consumer.

Section 2: Food Ingredients and Flavourings

This section of the guidance is for use when combinations of food ingredients and flavourings are used to impart a flavour to a food. These are general principles and different food categories may require different interpretations.

1. Food X present as an ingredient and natural X flavouring

There is a clear relationship between the source material and the flavour as well as food ingredient X being present in the product and therefore depiction should be permissible for this category.

2. Food X present as an ingredient and natural X flavouring with other natural flavourings

There is a clear relationship between the source material and the X flavour as well as food ingredient X being present in the product and therefore providing the wholly or mainly criteria is met depiction should be permissible for this category.

3. Food X present as an ingredient with natural flavouring

There is no clear relationship between the source material and the flavour however, food X is present as an ingredient and may support depiction. If the flavour of the named food is derived mainly from the ingredient then depiction should be permissible for this category.

4. Food X present as an ingredient with non-natural flavourings

If the non-natural flavouring does not contain any source material derived from flavour X then the flavour of the named food must be derived mainly from the ingredient as the flavouring alone will not support depiction.

If the non-natural flavouring is derived wholly or mainly from source material X then depiction should continue to be permissible for this category as the now repealed UK Food Labelling Regulations 1996 allowed this.¹

5. Foods X, Y or Z present as ingredients plus combinations of flavourings

When several ingredients are being depicted, each ingredient will need to be considered as advised above in relation to which type of flavouring is used in the product. In order to depict food ingredient X, Y and Z, each individual flavour does not need to be tasted individually in the food product for example in a tropical fruit juice blend, not every fruit will be individually identifiable by taste.

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INDUSTRY PRACTICE

Section 3: Flavourings on their own

This section of the guidance is for use when flavourings are declared as such in the ingredients list and used without the presence of the corresponding ingredient.

In order to make sure that the choice of labelling is appropriate, where the pictorial labelling is based solely on the use of flavourings the following guidance should be taken into account.

1. Natural X Flavouring (Article 16.4 of Regulation (EC) 1334/2008)

The flavouring component should consist of at least 95% weight/weight of the source material and the flavour perception of the named source needs to be easily recognised².

There is a clear relationship between the source material and the flavour and therefore depiction should be permissible for this category.

2. Natural X Flavouring with other natural flavourings (Article 16.5 of Regulation (EC) 1334/2008)

The flavouring component(s) derived from the named source(s) are present and their flavour can be easily recognised³.

There is a clear relationship between the source material and the flavour and therefore providing the wholly or mainly criteria is met depiction should be permissible for this category.

3. Natural Flavouring (Article 16.6 of Regulation (EC) 1334/2008)

The flavouring component is derived from different source materials and a reference to these would not reflect the flavour or taste *and therefore depiction should not be permissible for this category.*

4. Flavourings which cannot be described as natural

The labelling term flavourings must be used if the product contains any flavouring components which do not meet the specific requirement for the use of the term natural as defined in article 16 of Regulation (EC) 1334/2008.

In this case if the flavour is derived wholly or mainly from the named source depiction should be permissible for this category⁴.

5. Flavourings

In addition to the above requirements for the use of the term natural, Annex VII Part D paragraph 1 of Regulation (EC) 1169/2011. Article 29.1 of Regulation (EC) 1334/2008 allows the use of the term "flavourings" to describe all the categories of flavourings detailed in 1 to 4 above.

In all cases if the flavour is derived wholly or mainly from the named source depiction should be permissible for this category⁵.

The labelling requirements for flavourings **as sold** are defined in Chapter IV of Regulation (EC) 1334/2008. There are different labelling requirements for natural and non-natural flavourings and therefore these should be considered separately with regards to depiction.



¹N.B. any percentage of non-natural flavouring component renders the whole flavouring non-natural

²European Flavour Association (EFFA) Guidance document on the EC Regulation on Flavourings rev 3 (11/03/13) 3.1.2

³European Flavour Association (EFFA) Guidance document on the EC Regulation on Flavourings rev 3 (11/03/13) 3.1.3

⁴FSA Guidance Notes on the Food Labelling Regulations 1996, Paragraph 63.4

⁵FSA Guidance Notes on the Food Labelling Regulations 1996, paragraph 63.4

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Section 4: Presentation

Stylized vs Real

Whilst some Member States make a distinction between “real” and “stylised” pictorials, this has never been common practice in the UK. Therefore for the UK market it is recommended that **all** pictures which are recognisable as a particular food ingredient (whether photographic, realistic graphic representations or stylised pictures) should be subject to the guidance contained elsewhere within this document.

The impact of other elements of the product presentation on the overall impression of the product (such as the shape of packaging or the colour choice) may need to be considered so that they do not amount to a misleading presentation.

Serving Suggestion and other phrases indicating that the flavour of the food is not from the pictured food

Manufacturers commonly use the term “serving suggestion” to inform the consumer that some or all of ingredients pictured on the label can be eaten *with* the food, and do not form part of the product as sold. The use of this phrase has its basis in the Food Labelling Regulations 1996 Guidance Notes, paragraph 63.2 and has been used by manufacturers in the UK (and elsewhere in the EU) for many years and is well understood by consumers. Other phrases indicating that the flavour of the food is not from the pictured food may be acceptable in the context of ‘guess the flavour’ or ‘invent a flavour’ competitions, subject to advice by Trading Standards. Serving suggestion and other phrases which make it clear that the flavour of the food is not obtained from the pictured food should be an acceptable practice provided they are used appropriately and in close proximity to the pictorial representation (wherever it is used).

Proportionality

Representation of a particular ingredient on a label should be proportional to its contribution to the product. Care should be exercised to ensure that the quantity of an ingredient is not exaggerated by picturing an inappropriate excess of an ingredient (number and size, % surface of the pack), or through selective emphasis of particular ingredients where this is not warranted by the flavour profile of the food. Recognition should however, be given to the need to depict ingredients in a form that

consumers would recognise (e.g. peppercorns instead of pepper grains) and to the fact that some ingredients are used for colour/texture and not necessarily for flavour. Manufacturers should also be free, however, to selectively highlight the presence of ingredients in a food where they are characterising the food’s sensory profile, even where those ingredients used in the formulation in small quantities. The selective use of pictorials in this manner could trigger the requirement to provide Quantitative Ingredients Declarations for these ingredients. Any requirement to QUID should be made with regard to Article 22 of Regulation (EU) No 1169/2011.

‘Flavoured’ versus ‘Flavour’

The term ‘X-flavoured’ should be used in the naming of a food or drink where that food or drink contains the food ingredient of flavour X or where the food or drink contains a flavouring derived from the food ingredient flavour of X.

For example:

1. Where ‘natural X flavouring’ is used; or
2. Where ‘natural X flavouring with other natural flavourings’ is used; or
3. Where ‘flavouring’ that is derived wholly or mainly from X flavour are used in the food/drink product.

Depiction should be permissible for this category.

The term ‘X-flavour’ should be used in the naming of a food or drink where that food or drink has the flavour of X but does not contain X.

For example:

1. Where ‘natural flavouring’ is used or;
2. Where ‘flavouring’ that is not derived wholly or mainly from X flavour is used in the food/drink product.

Depiction should not be permissible for this category.

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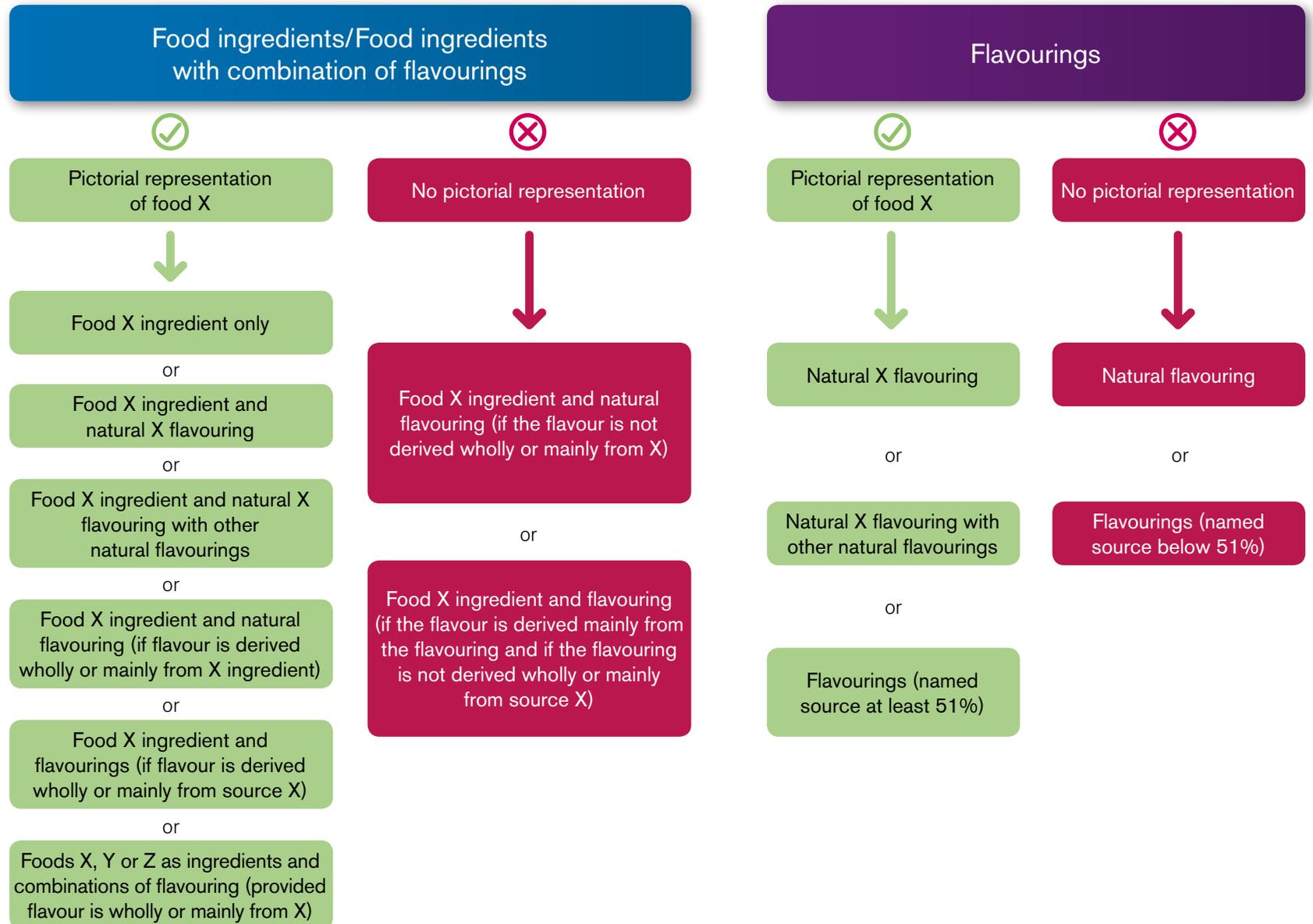
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EXAMPLE: Strawberry and Mango Herbal Infusion – Possible Depiction of Strawberry and Mango

Ingredient list	Which Section Applies	Depiction supported	Why
Hibiscus, dried strawberry pieces, dried mango pieces, orange leaves, orange peel rosehips.	1	Yes	The depicted ingredients are present as dried pieces and no flavourings are present. (Click on section 1 for guidance.)
Hibiscus, dried strawberry pieces, dried mango pieces, flavourings* , orange leaves, orange peel rosehips. (See below for possible flavourings in this product.)	2	Possibly	Although the depicted ingredients are present the nature of the flavourings is not known. Find out more about the flavouring and see which paragraph of section 2 applies e.g. for natural flavouring paragraph 3 applies i.e. 2.3.
<i>*Natural strawberry flavouring, natural Mango flavouring</i>	2.1	Yes	All of the taste of the strawberry and mango is derived from those fruits.
<i>*Natural strawberry flavouring with other natural flavourings, natural mango flavouring with other natural flavourings</i>	2.2	Probably	It is likely that the taste of the strawberry and mango is derived from these fruits however as other natural flavours are present the wholly or mainly criteria must be applied. The % FTNF is required to do this, see example below left.
<i>e.g. Strawberry is 51% FTNF Mango is 51% FTNF</i>		Yes	In this example the wholly or mainly criteria has been met.
<i>*Natural flavourings</i>	2.3	Possibly	Depiction will only be supported if the wholly or mainly criteria is met.
<i>*non-natural mixed fruit flavouring</i>	2.4	Possibly	If the strawberry and mango taste is from the pieces then depiction is supported but if it is mainly coming from the flavour depiction will only be supported if the flavouring is wholly or mainly from strawberry and mango.
Hibiscus, dried strawberry pieces, natural strawberry flavouring, orange leaves, orange peel, rosehips, natural flavouring, dried mango.	2.5	Strawberry Yes Mango Possibly	Each ingredient is to be considered separately. Depiction of mango will only be supported if the wholly or mainly criteria is met.
Hibiscus, flavourings* , orange leaves, orange peel, rosehips. (See below for possible flavourings in this product.)	3	Possibly	Find out more about the flavouring and see which paragraph of section 3 applies.
<i>*Natural strawberry flavouring, natural Mango flavouring</i>	3.1	Yes	All of the taste of the strawberry and mango is derived from those fruits.
<i>*Natural strawberry) and mango) flavouring with other natural flavourings</i>	3.2	Probably	The strawberry and mango flavourings are partially derived from strawberry and mango and the flavour can be easily recognised. Depiction is possible provided wholly or mainly criteria is met.
<i>*Natural Flavouring (no mango or strawberry)</i>	3.3	No	An ingredient that is not represented in the product can't be depicted.
<i>*Natural Flavouring (with strawberry and mango)</i>		Possibly	Depiction will only be supported if the wholly or mainly criteria is met
<i>*Non-natural strawberry and mango flavouring</i>	3.4	Possibly	Depiction will only be supported if the wholly or mainly criteria is met.

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EXAMPLE: Raspberry and Cranberry yogurt – Possible Depiction of Raspberry and Cranberry

Ingredient list	Which Section Applies	Depiction supported	Why
Yogurt, Raspberry, Sugar, Cranberry juice from concentrate, Stabiliser (guar gum), Acidity regulator (sodium citrate)	1	Yes	The depicted ingredients are present as pieces or juice and no flavourings are present. (Click on section 1 for guidance.)
Yogurt, Raspberry, Sugar, Cranberry juice from concentrate, Stabiliser (guar gum), Acidity regulator (sodium citrate), Flavourings* (See below for possible flavourings in this product.)	2	Possibly	Although the depicted ingredients are present the nature of the flavourings is not known. Find out more about the flavouring and see which paragraph of section 2 applies.
<i>*Natural raspberry flavouring, Natural cranberry flavouring</i>	2.1	Yes	All of the taste of the raspberry and cranberry is derived from those fruits.
<i>*Natural raspberry flavouring with other natural flavourings, Natural cranberry flavouring with other natural flavourings,</i>	2.2	Probably	It is likely that the taste of the raspberry and cranberry is derived from these fruits however as other natural flavours are present the wholly or mainly criteria must be applied. The % FTNF is required to do this, see example below left.
<i>Eg Raspberry is 60 % FTNF, Cranberry is 79 % FTNF</i>		Yes	In this example the wholly or mainly criteria has been met.
<i>*Natural flavourings</i>	2.3	Possibly	Natural flavouring will not support the depiction. If the quantity of raspberry and cranberry juice is considered high enough to bring taste and texture to this category of products, depiction will be supported. If the quantity of raspberry and cranberry juice may seem low compared to the established practice for this category of product, taste the product with and without the flavouring. If the taste of Raspberry and Cranberry is derived wholly or mainly from the pieces and juice they will support depiction.
<i>*Non-natural flavouring</i>	2.4	Possibly	If the raspberry and cranberry taste is from the pieces and juice (established as in the line above) then depiction is supported but if it is mainly coming from the flavour depiction will only be supported if the flavouring is wholly or mainly from strawberry and mango.
Yogurt, Raspberry, Sugar, Cranberry juice from concentrate, Stabiliser (guar gum), Acidity regulator (sodium citrate), Natural raspberry flavouring, Natural flavouring	2.5	Raspberry yes Cranberry no	Each ingredient needs to be considered separately. In this example section 2.1 applies to raspberry and section 2.3 to cranberry. Cranberry can be tasted but the juice quantity is low and tasting the product with and without the flavouring shows that the cranberry taste comes mainly from the natural flavouring rather than from the cranberry juice.
Yogurt, Sugar, Stabiliser (guar gum), Acidity regulator (sodium citrate), Flavourings* (See below for possible flavourings in this product.)	3	Possibly	Find out more about the flavouring and see which paragraph of Section 3 applies.
<i>**Natural raspberry flavouring, Natural cranberry flavouring</i>	3.1	Yes	All of the taste of the raspberry and cranberry is derived from those fruits.
<i>*Natural raspberry (40% FTNF) and cranberry (35% FTNF) flavouring with other natural flavourings</i>	3.2	Yes	Total % FTNF in this flavouring is 75% of combined raspberry and cranberry which meets the wholly or mainly criteria and therefore depiction of both fruits are supported.
<i>*Natural flavourings (no raspberry, no cranberry)</i>	3.3	No	An ingredient that is not represented in the product can't be depicted.
<i>*Non-natural raspberry and cranberry flavouring</i>	3.4	Possibly	Depiction will only be supported if the wholly or mainly criteria is met.

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Snack Noodles with Flavour sachet

EXAMPLE: Snack Noodles with Flavour sachet – Possible Depiction of Mushroom

Ingredient list	Which Section Applies	Depiction supported	Why
Flavour Sachet: Maltodextrin, Flavour Enhancers (Monosodium Glutamate, Disodium Guanylate, Disodium Inosinate), Sugar, Mushroom (5%), Salt, Onion, Yeast Extract, Herbs and Spices (Black Pepper, Turmeric, Parsley, Rosemary, Thyme), Garlic, Sunflower Oil, Colour (Ammonia Caramel).	1	Yes	The depicted ingredient is present in a powdered form within the flavor sachet and no flavourings are present. (Click on section 1 for guidance.)
Flavour Sachet: Maltodextrin, Flavour Enhancers (Monosodium Glutamate, Disodium Guanylate, Disodium Inosinate), Sugar, Mushroom (5%), Salt, Onion, Yeast Extract, Flavouring* , Herbs and Spices (Black Pepper, Turmeric, Parsley, Rosemary, Thyme), Garlic, Sunflower Oil, Colour (Ammonia Caramel). (See below for possible flavourings in this product.)	2	Likely	The depicted ingredient is present at 5% in a powdered form, the nature of the flavourings is not known. Find out more about the flavouring and see which paragraph of section 2 applies e.g. for natural flavouring paragraph 3 applies i.e. 2.3.
<i>*Natural mushroom flavouring</i>	2.1	Yes	All of the mushroom taste is derived from mushroom and the flavouring meets the 95:5 rule.
<i>*Natural mushroom flavouring with other natural flavourings</i>	2.2	Likely	It is likely that the taste of the mushroom is derived from mushroom but as other natural flavours are present the wholly or mainly criteria must be applied. As a guide this means at least 51% w/w of the flavouring components of the flavouring should come from the depicted source. Also bear in mind that the presence of the mushroom powder should be supporting depiction.
<i>*Natural flavourings</i>	2.3	Possibly	The presence of natural flavouring(s) alone would not support the depiction. However, you could taste the snack noodles (specifically the flavouring sachet) with and without the flavouring and provided the mushroom taste is coming from the dried mushroom powder, and then depiction will be permitted regardless of the flavouring.
<i>*Non-natural flavouring, mushroom</i>	2.4	Possibly	If the mushroom taste is primarily coming from the presence of the mushroom powder then depiction is supported. However, if it is coming from the non-natural flavouring then depiction is unlikely. Unless, the non-natural flavouring is derived wholly or mainly from mushroom, in which case depiction should be permissible.

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EXAMPLE: Snack Noodles with Flavour sachet – Possible Depiction of Mushroom

Ingredient list	Which Section Applies	Depiction supported	Why
Flavour Sachet: Maltodextrin, Flavour Enhancers (Monosodium Glutamate, Disodium Guanylate, Disodium Inosinate), Sugar, Salt, Onion, Yeast Extract, Flavouring* , Herbs and Spices (Black Pepper, Turmeric, Parsley, Rosemary, Thyme), Garlic, Sunflower Oil, Colour (Ammonia Caramel). (See below for possible flavourings in this product.)	3	Possibly	It is vital to find out more about the flavourings (as no mushroom powder is present) and see which paragraph of section 3 applies.
<i>*Natural mushroom flavouring</i>	3.1	Yes	All of the mushroom taste is derived from mushroom and the flavouring meets the 95:5 rule.
<i>*Natural mushroom flavouring with other natural flavourings</i>	3.2	Likely	It is likely that the taste of the mushroom is derived from mushroom but as other natural flavours are present the wholly or mainly criteria must be applied. As a guide this means at least 51% w/w of the flavouring components of the flavouring should come from the depicted source.
<i>*Natural flavourings</i>	3.3	No	An ingredient that is not represented in the product can't be depicted.
<i>*Non-natural flavouring, mushroom</i>	3.4	Possibly	Depiction will only be supported if the wholly or mainly criteria is met.



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About FDF

The Food and Drink Federation is the voice of the UK food and drink industry, the largest manufacturing sector in the country. Our sector directly employs around 400,000 people and accounts for almost 16% of the UK's total manufacturing sector by value. We are an essential partner to UK farmers, buying the bulk of what they produce.

Our membership comprises manufacturers of all sizes as well as trade associations dealing with specific sectors of the industry. In representing the interests of our members, we focus on the following core priorities:

- **Food Safety and Science**
- **Health and Wellbeing**
- **Sustainability**
- **Competitiveness**

6 Catherine Street, London WC2B 5JJ

Tel: 020 7836 2460

Email: generalenquiries@fdf.org.uk

Web: www.fdf.org.uk

Twitter: @Foodanddrinkfed