

Buisman Ingredients

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How to declare caramelised sugars and caramel colours

Abstract:

Declarations of caramelised sugars as either caramel, flavouring and colouring food stuff or aroma depends on the primary reason for use. If colouring is the sole reason, the product falls under the food additives regulation EU 1333/2008 and needs to comply with definitions and purity as described in EU directive 231/2012.

If flavour is the main reason for use, the product can be seen as an aromatic preparation and then falls under the EU regulation for aroma's EU 1334/2008. The declaration is then natural flavouring.

Most common declaration however is as such, naming the ingredient "caramelised sugar" or "caramel" which supplies both colour and flavour. Buisman offers a wide range of caramelised sugars to enable this label friendly option.

Introduction:

In the light of European legislation on aroma's (EU 1334/2008) and additives (EU 1333/2008) as well as ongoing evaluations of colourings, the need to have a clear overview of declaration options for caramelised sugars is evident.

The main objective of the EU legislation efforts is to raise the level of consumer protection, to be established by increased food safety with the aim of unambiguous and correct label information. This information sheet is meant to help you to establish this with respect to labelling of caramelised sugars and plain caramels and to clarify the differences.

For caramels, used as food colouring, definitions plus declarations and purity is clearly described in the EU directive 231/2012¹. Four classes of caramel have been defined; E150a through to E150d. Caramelised sugars and caramels need to be labelled as such, whenever the primary reason for addition is to bring colour to the end application. Plain caramel may be used as wording to identify E150a.

EU food legislation does not define "caramelised sugar" or "burnt sugar" standards of identity, although they have a long history; a long lasting 150 years safe use as an ingredient in the food industry and home cooking. A new guidance note on the classification of food extracts with colouring properties has come out end of 2014². In this guidance the caramelised sugars are mentioned and seen as food or characteristic food ingredient. Therefore the most commonly used practice is to label the ingredient as caramelised sugar. See also decision tree from EUTECA to help customers distinguish between caramelized sugar (aromatic foodstuff) and Plain caramel colour³.

¹ Regulation 231/2012 laying down specifications for food additives:
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2012:083:0001:0295:EN:PDF>

² Guidance note on the classification of food extracts with colouring properties:
http://ec.europa.eu/food/food/AEF/additives/guidance_en.htm

³ Euteca Decision tree for labelling caramelised sugar:
http://www.euteca.org/pdf/EUTECA_decision-tree_on_e150a_burnt_sugar.pdf

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The challenge:

But what to declare, if the purpose of adding plain caramel or caramelised sugar to your product is to bring flavour to it, not just colour? You can then either mention it as such, or declare it under aromas, if applicable. According to the scope of the additives regulation (under which colours are described), aromatic components are excluded, and covered by a specific regulation.

Basically, if plain caramel or caramelised sugars are used to bring flavour to a product and consequently have a colouring effect as well, the usage could fall under EU regulation 1334/2008⁴. The other option is to declare the product as such (caramel or caramelised sugar) as a foodstuff with flavouring and colouring purpose.

Within the various definitions mentioned in the EU 1334/2008 regulation, caramelised sugars might fall under “flavouring preparation”, depending on type of raw material and processing conditions. In both cases, as food grade ingredients are used as raw materials and processing falls under the definitions of traditional food preparation processes (annex II) no further evaluation is required nor is listing in the Annex I list of flavourings.

Declaration can be done by grouping the caramelised sugar together with others and list the group as “flavours”. Other option is to use commonly known phrases as caramelised sugar or burnt sugar, which describe the product characteristics accurately.

With respect to a particular group of caramelised sugars, interpretation of the 1334/2008 article 16 leads to the conclusion that usage of the term “natural” is admitted in combination with flavouring preparations, as long as only natural ingredients (different sugars) are used, and caramelisation took place traditionally. Article 16 sections 2 and 6 apply to this specific product group. So specific products could be called “natural flavour”, “natural burnt sugar” or “natural caramelised sugar”.

The EFFA (European Flavour Association) guidance document on this topic supports the usage of the term natural⁵.

Declaration of **caramelised sugar**;

Function:	Colour	Flavour	Colour and Flavour
Legislation:	Colouring component under EU 1333/2008 and 231/2012.	Aroma component under EU 1334/2008	Food stuff with colouring and flavouring purpose under Guidance notes on the classification of food extracts etc.
Labelling:	Colour; E150a or Plain caramel	Natural Flavouring	(Natural) Caramelised Sugar or (Natural) Burnt Sugar or (Natural) Caramel

⁴ Regulation 1334/2008 on flavourings and certain food ingredients with flavouring properties:
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:273:0018:0024:EN:PDF>

⁵ European Flavour Association; EFFA guidance document for the production of natural flavouring ingredients:
<http://www.effa.eu/en/publications/guidance-documents>

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