



## **NATCOL Position on the SCoPAFF Opinion on plant extracts with a technological function in relation to Colouring Foods**

24 June 2019

NATCOL considers that the Standing Committee on Plants, Animals, Food and Feed (SCoPAFF) opinion on the use of “plant extracts rich in constituents capable in performing a technological function” of September 2018 does not concern colouring foods when used primarily for their colouring properties.

Colouration of food is a specific case and is individually regulated. Unlike botanical extracts in general, colouring foods are recognized in the European Additive Regulations for a long time. Already in the Directive 94/36/EC a distinction was made between additive colours and colouring foods. Indeed, colour additives are defined as substances in which the pigments were selectively extracted.

This specificity was subsequently confirmed in the current Regulation (EC) 1333/2008 which defines colour additives in Annex I (2) and provides further clarification on colours/additives in recital 5. The definition in Annex I (2) reads:

*‘colours’ are substances which add or restore colour in a food, and include natural constituents of foods and natural sources which are normally not consumed as foods as such and not normally used as characteristic ingredients of food. Preparations obtained from foods and other edible natural source materials obtained by physical and/or chemical extraction resulting in a selective extraction of the pigments relative to the nutritive or aromatic constituents are colours within the meaning of this Regulation;*

As a consequence, when non-selectively extracted preparations from foods and edible natural source materials are added to foods for the purpose of colouring, these are not colour additives according to Regulation EC No. 1333/2008 but colouring foods.

Whether an extraction process for obtaining colouring food is selective or not depends, according to Regulation (EC) No 1333/2008, on the ratio of the pigments relative to the nutritive or aromatic constituents in the obtained extract on the one hand and in the source material on the other. This principle is reflected and further elaborated in the document “Guidance Notes on the classification of food extracts with colouring properties” published in 2013.

In order to search for and compile the necessary reference values, documenting the biological variation as far as possible, the support of the Joint Research Centre (JRC), one of the Directorates General of the European Commission, was requested by DG SANTE. The JRC report has been completed and published in 2015 (<http://publications.jrc.ec.europa.eu, JRC96974>) and gives an overview of currently available data on nutritional information, and pigment and aroma constituents of typical source materials used for production of colouring foods. NATCOL has reached out to the European Commission in order to further refine the data provided in the JRC report and which finally should result in Annex III of the Guidance Notes.

Therefore, as clearly demonstrated above, Regulation EC No. 1333/2008 and the JRC report underline the unique positioning of colouring foods within the EU. Thus, plant extracts rich in constituents capable in performing a technological function as food additives are well differentiated from colouring foods.

\*\*\*\*\*

**Natural Food Colours Association**

NATCOL aisbl. Rond-Point Schuman 6, boîte 5 (5th floor), 1040 Etterbeek, Brussels, Belgium.

<https://natcol.org> - VAT BE0696.720.514