

## NATURAL STATEMENT

Caramel Color is regulated by the FDA, therefore Sethness Products Company (SPC) follows the FDA stance on subjects related to Caramel Color, such as, the use of “Natural” for food labeling. The FDA does not have a legal definition for a “Natural” color additive. Caramel Color is exempt from certification (unlike FD&C dyes, which require certification), is GRAS (21 CFR 182.1235), and is derived from food grade carbohydrates.

According to the FDA any color added to food means the food becomes “Artificially Colored” (21 CFR 101.22 (k)(2)). The following excerpt is from “Use of the Term Natural on Food Labeling”, [www.fda.gov](http://www.fda.gov) :

“Although the FDA has not engaged in rulemaking to establish a formal definition for the term “natural,” we do have a longstanding policy concerning the use of “natural” in human food labeling. The FDA has considered the term “natural” to mean that nothing artificial or synthetic (including all color additives regardless of source) has been included in, or has been added to, a food that would not normally be expected to be in that food. However, this policy was not intended to address food production methods, such as the use of pesticides, nor did it explicitly address food processing or manufacturing methods, such as thermal technologies, pasteurization, or irradiation. The FDA also did not consider whether the term “natural” should describe any nutritional or other health benefit.”

Here are a few facts that might assist you, the customer, in deciding on the use and labeling of your products that contain our Caramel Colors regarding “Natural”:

- SPC cannot claim that our Caramel Colors are “Natural” (no Natural Certificate).
- SPC manufactures Sethness Roquette Caramel Colors according to 21 CFR 73.85 in which only corn or cane derived carbohydrates are utilized. Corn syrups are derived from genetically engineered (GE) plants, but do not contain genetic material and are PCR negative. Therefore, Caramel Colors manufactured from corn syrups are also considered GE by source, but PCR negative. Cane syrups are **not** derived from genetically engineered plants, so Caramel Colors manufactured from cane syrups are Non-GE.
- There are 4 classes of Caramel Colors which use a variety of approved raw materials. There are no solvents, alcohol, preservatives, added flavors (natural or artificial), or other colors used in the manufacture of our Caramel Colors.
- Our Caramel Colors are not subjected to radiation, ethylene oxide treatment or other forms of post cooking sterilization methods.
- Our company does not use sewer sludge in any way in the manufacture of Caramel Colors, nor are they exposed to sewer sludge. Sewer sludge is not used in the manufacturing of the raw materials supplied to our Company per supplier documentation.

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