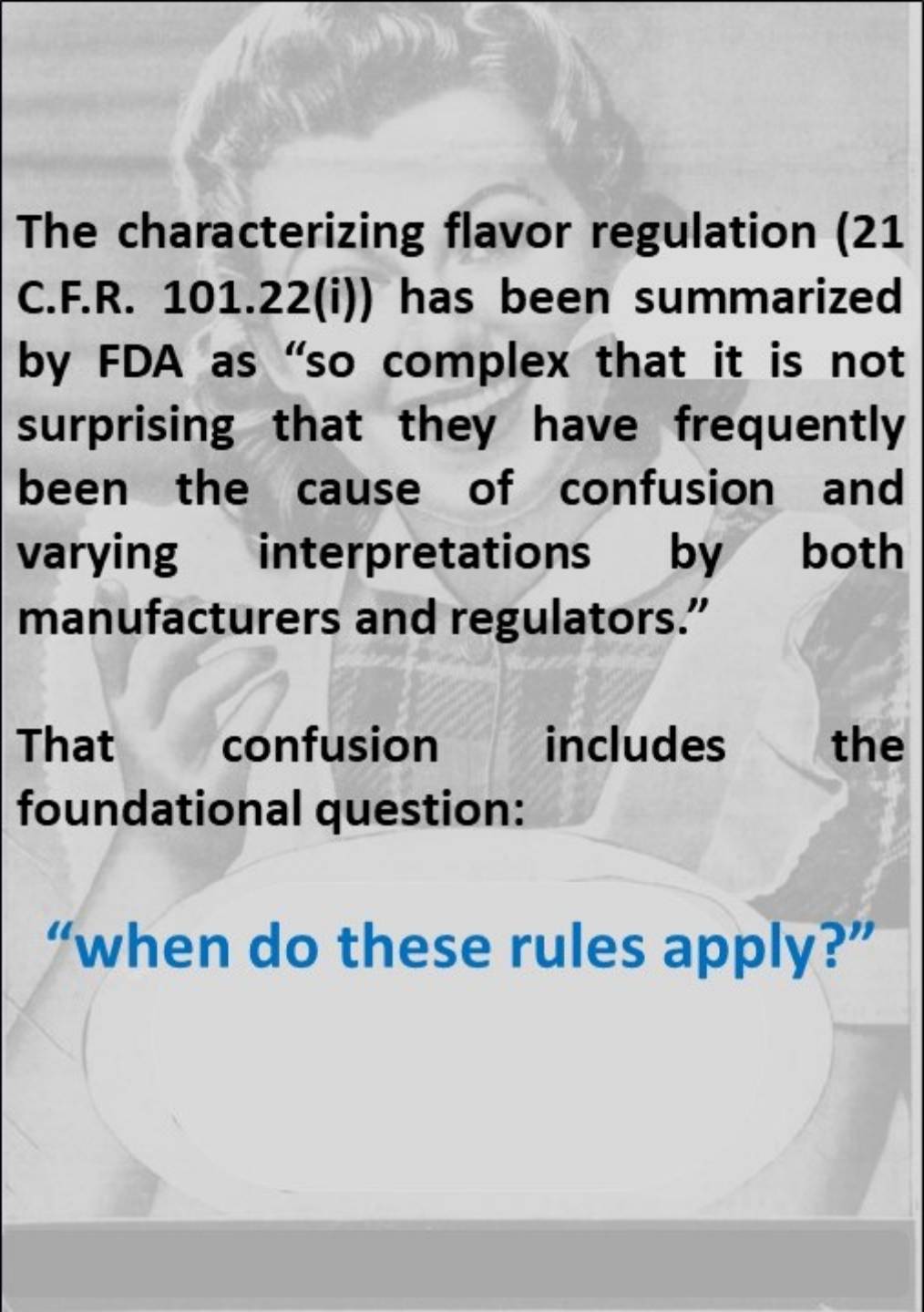


# Applying the Characterizing Flavor Reg in **COLOR**



So when does  
the rule apply  
anyways?

**The Prequel:**  
not everything  
requires a qualifier



The characterizing flavor regulation (21 C.F.R. 101.22(i)) has been summarized by FDA as “so complex that it is not surprising that they have frequently been the cause of confusion and varying interpretations by both manufacturers and regulators.”

That confusion includes the foundational question:

**“when do these rules apply?”**

The regulation specifies that it only concerns situations when a flavorant “simulates, resembles or reinforces” a characterizing flavor.

However from the beginning there has been a “widespread failure to understand the relatively limited circumstances under which §1.12(i) [characterizing flavor] will apply.”

Here's how FDA thought that this reg would work:

**COLOR**

# For this Chocolate Pudding

**Does the regs  
apply?**



# Vanillin in chocolate pudding

**Nope, vanillin  
doesn't taste  
like chocolate.**



# For this Cherry Juice

**Does the regs  
apply?**



# Benzaldehyde in cherry juice

Yes,  
benzaldehyde  
reinforces &  
extends  
cherry taste.





## ***In written form:***

**“vanillin added to a chocolate pudding would clearly not be a characterizing flavor because it [vanillin] does not taste like chocolate”**

**“benzaldehyde added to a cherry juice would be an artificial flavor because it [benzaldehyde] does reinforce and extend the cherry taste.”**



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A vintage black and white photograph of a woman with styled, wavy hair, smiling warmly. She is wearing a plaid dress with a white collar and a white apron with a scalloped edge. Her right hand is raised near her chest. A white speech bubble with a black border is positioned to the right of her face, containing the text 'Plus vintages pictures & ads'.

Plus vintages  
pictures & ads

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