



Natural Statement – Acidulant Products

There is no formal definition issued by FDA for the term "natural" except as it is defined for "natural flavors" under 21 CFR 101.22 and FDA does not restrict the use of the term "natural" solely to flavorings. At this time, the FDA considers ingredients to be natural on a "case by case" basis, which takes into account the ingredient source and the processing to derive the product. Using this information, we can state that citric acid and its salts are produced by fermentation of carbohydrates from corn and/or molasses using a Non-GM microbe. The final product is produced by purification from this source.

ADM does not express an opinion whether their inclusion in your finished product qualifies your product as "natural" under U.S. FDA policy or that of any other federal or state regulatory agency. Ultimate labeling of the finished product and specific claims should be discussed with your legal counsel.