



AHPA Guidance Policy

AHPA develops guidance policies to promote responsible commerce in herbal supplements. These policies address a variety of labeling and manufacturing issues and reflect the consensus of AHPA's members and its board of trustees. AHPA encourages its members and non-member companies to adopt these policies to establish consistent and informed trade practices.

Guidance on Pesticide Specifications (adopted March 2017)

AHPA recommends food and dietary supplement manufacturers that choose to set pesticide specifications consider the following approach to determine when such specifications should be established for herbal ingredients. This guidance may be useful for dietary supplement manufacturers complying with 21 CFR Part 111 (Current Good Manufacturing Practice in Manufacturing, Packaging, Labeling, or Holding Operations for Dietary Supplements) and food (including tea) manufacturers complying with hazard analysis provisions in 21 CFR Part 117 (Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventative Controls for Human Food).

- Crops that are certified as organic under USDA's National Organic Program (NOP), including herbal crops, are required to comply with specific NOP regulations, such that any pesticide residues present in such crops must not exceed limits established under the NOP. Therefore, no specifications for pesticides are required to comply with 21 CFR 111.70 (c)(3) or 21 CFR 117.130(b) for herbal ingredients certified as organic under the NOP.
- All other crops grown in the United States, including herbal crops, are required to comply with pesticide regulations established by the Environmental Protection Agency (EPA), such that any pesticide residues present in such crops must not exceed limits established by EPA. Therefore, no specifications for pesticides are required to comply with 21 CFR 111.70 (c)(3) or 21 CFR 117.130(b) for herbal ingredients grown in the United States.
- Imported crops including herbal crops that are not certified as organic under the NOP are required to be in compliance with EPA's pesticide regulations at the time of importation and are subject to inspection and testing by the Food and Drug Administration (FDA) to insure compliance. FDA maintains Import Alerts to identify any crops found to be out of compliance with EPA pesticide regulations, and specifically IA #99-05, organized by individual growers / shippers; and #99-14, organized by country. These Import Alerts are updated frequently and may be checked at the time of import. Therefore, specifications for pesticides may need to be established to comply with 21 CFR 111.70 (c)(3) or 21 CFR 117.130(b) for herbal crops identified on any of these FDA Import Alerts.