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.

Ingredients that are or are produced from genetically modified organisms (GMOs) (adopted June 2003; revised March 2015, November 2021)

AHPA recognizes that:

- The use of genetically modified organisms (GMO)[1] as a tool in agriculture is viewed by some as providing the potential to meet basic global food needs and deliver a wide range of health, environmental and economic benefits;
- Concerns have also been expressed by others about the potential impact of agricultural use of GMO on the environment and health;
- Numerous countries have established laws controlling the cultivation of GMO crops and the labeling of food and feed derived from such crops, for example the European Union has enacted regulations requiring labeling of foods that are derived from GMO crops[2];
- The National Bioengineered Food Disclosure Standard (NBFDS; 7 C.F.R. Part 66) requires entities that label foods for retail sale to disclose the presence of foods and food ingredients that contain genetic material that has been detectably modified through recombinant DNA techniques, subject to additional exceptions and restrictions stated in that rule;
- AHPA supports positions that are based on scientific reasoning and also supports positions that favor a sustainable approach to environmental issues and a responsible approach to health issues related to commerce in herbs and herbal products;
- AHPA supports consumers' right to be informed on issues that affect their purchasing decisions.

AHPA therefore:

- Encourages companies that grow, process, manufacture, market or sell herbal products to refrain from using herbal raw agricultural products cultivated with GMO technologies, or extracts and flavors thereof;
- Supports labeling of consumer goods to identify any ingredients that are herbal raw agricultural products knowingly and intentionally cultivated

with GMO technologies, or extracts and natural flavors thereof, in a manner that assures that consumers are informed that the ingredient was cultivated with GMO technology and in conformity with the NBFDS, including its voluntary disclosure provisions;

- Opposes labeling of foods that contain GMO ingredients as “natural” or with any similar term.

Nothing in this policy is meant to comment on research regarding GMO technology or minimal and/or unintentional mixing of GMO and non-GMO crops. This resolution does not create an obligation for any AHPA member.

1) GMO is used here as it is a commonly recognized term that refers to genetically modified materials. The term is synonymous with “genetically engineered”, defined in the National Organic Standards Board’s Biotechnology Policy (September 1996) as: “Made with techniques that alter the molecular or cell biology of an organism by means that are not possible under natural conditions or processes…[and]…is not limited to recombinant DNA, cell fusion, micro-and macro-encapsulation, gene deletion and doubling, introducing a foreign gene and changing the position of genes…[and]…does not include breeding, conjugation, fermentation, hybridization, in-vitro fertilization and tissue culture.”

The terms “micro- and macro-encapsulation” as referenced in the above definition are assumed to be used in the context of genetic modification. These terms may also be used to describe manufacturing processes that do not include genetically modified material. Micro- and macro-encapsulation manufacturing processes that do not include genetically modified material are not encompassed by this policy.

Of additional relevance, the term “bioengineered food” is defined by USDA in the NBFDS somewhat narrowly as “A food that contains genetic material that has been modified through in vitro recombinant deoxyribonucleic acid (rDNA) techniques and for which the modification could not otherwise be obtained through conventional breeding or found in nature”, subject to additional factors, conditions and limitations. As the scope of this term is narrower than the term “GMO” as used in this document, compliance with NBFDS does not ensure compliance with this guidance policy.

2) Regulation (E.C.) No. 1829/2003, section 2, Labelling.