



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.

Labeling of Alcohol-Removed Products (Adopted March 2016)

AHPA recommends that manufacturers of liquid herbal products in which ethanol is used as a solvent and is subsequently removed refrain from using "alcohol-free" on product labeling, unless the manufacturer establishes through appropriate testing that alcohol* is not detected in the product. AHPA instead encourages the use of such terms as "alcohol-removed," "dealcoholized," or "nonalcoholic" if the product contains less than 0.5 percent ethanol by volume. AHPA also encourages the inclusion of the phrase "contains less than 0.5 percent alcohol by volume" or a significantly similar phrase.

*The term "alcohol" used here refers to ethanol (also called ethyl alcohol). The following regulations may be relevant to labeling of these or similar products:

- U.S. Federal law defines a product with a 0.5 percent or more ethanol by volume as an alcoholic beverage. [27 U.S. Code § 214(1).]
- The U.S. Food and Drug Administration (FDA) does not consider the terms "non-alcoholic"* and "alcohol-free" to be synonymous when applied to wine and malt beverages, and this Agency takes the position that the term "alcohol-free" may be used only when such products contain no detectable alcohol. FDA considers such products containing less than 0.5 percent alcohol by volume as "non-alcoholic." [FDA Compliance Policy Guide (CPG) Sec. 510.400: Dealcoholized Wine and Malt Beverages – Labeling.]
- In its regulations on labeling and advertising of malt beverages, the Department of the Treasury's Alcohol and Tobacco Tax and Trade Bureau (TTB) allows, unless otherwise prescribed under State law, the term "non-alcoholic" on such products but only provided the statement "contains less than 0.5 percent (or .5%) alcohol by volume" also appears on the label. This regulation also limits use of the term "alcohol free" only to such products that contain no alcohol. [27 Code of Federal Regulations § 7.65 (e) and (f).]