



## 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 Protein in Food and Dietary Supplements** (adopted March 2014)

Marketers of conventional foods and dietary supplements adhere to the following guidelines in labeling the protein in any such product:

- Notwithstanding the allowance in 21 CFR § 101.9(c)(7) to calculate the amount of protein to be declared in nutrition labeling of a food or dietary supplement on the basis of the factor of 6.25 times the nitrogen content of the food, the quantity of protein in a product is calculated to include only proteins that meet the following definition: "A chain of amino acids connected by peptide bonds."
- As further clarification, non-protein nitrogen-containing (NPN) substances are not counted toward total protein content on product labels. NPN substances are accounted for and subtracted from the total nitrogen content when protein is measured by nitrogen content.
- Nothing in this guidance is intended to replace or conflict with any regulatory requirement established under any other subpart or section of 21 CFR Part 101 for labeling of food and dietary supplement products.