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Voluntary Guidelines for Labeling Caffeine-Containing Products

PURPOSE:

Whether added as a pure ingredient or incorporated from a naturally-occurring source¹, caffeine is a safe dietary ingredient found in many foods and dietary supplements. NPA believes consumers have a right to know about the products they purchase. Therefore, NPA recommends that its members follow these voluntary guidelines for their foods and dietary supplements that contain caffeine. These guidelines address disclosure of caffeine content and set forth consumer advisories to promote the safe, responsible use of natural products.

VOLUNTARY GUIDELINES:

In addition to compliance with applicable labeling laws and regulations, NPA recommends that its members adhere to the following guidelines for the labeling of caffeine-containing products:

A. Disclosure of Total Caffeine Content

The purpose of this guideline is to provide consumers with information on the total caffeine content per serving in foods and dietary supplements, whether from added or naturally occurring caffeine.

1. Caffeine content from both added caffeine and naturally-occurring caffeine combined should be declared in milligrams per serving either in the Supplement/Nutrition Facts Box or in a separate statement elsewhere on the label.
2. This section does not apply to foods or dietary supplements that contain no added caffeine and less than 25 mg per serving of naturally-occurring caffeine.

B. Label Advisories for Conditions of Use

The purpose of this guideline is to provide consumers with additional information about the use of products containing caffeine.

1. Any food or dietary supplement with total caffeine content of more than 100 mg per serving should provide the following statements or equivalent language on the product label:
 - a. This product is not intended/recommended for children and those sensitive to caffeine.
 - b. Pregnant or nursing women, those with a medical condition, and those taking medication should consult a healthcare professional before use.

C. Serving Size and Daily Intake Recommendations

¹ For purposes of this document, “added caffeine” refers to pure anhydrous caffeine. “Naturally occurring caffeine” refers to caffeine that occurs naturally in other ingredients, including but not limited to, green tea, guarana, cocoa, kola nut, and yerba mate.

The purpose of this guideline is to encourage manufacturers and marketers to establish caffeine levels per serving and total servings per day that are consistent with current science and in compliance with applicable laws.

1. Labeling should provide serving size and daily intake recommendations that are consistent with safety information about caffeine established by competent and reliable scientific evidence.
2. Serving size and daily intake recommendations should comply with Section 402(f)(1)(a) of the Federal Food, Drug, and Cosmetic Act, which requires product ingredients to be safe under the conditions of use recommended in labeling, or if no conditions of use are recommended in the labeling, under ordinary conditions of use.

D. Restraints Against Marketing In Combination with Alcohol

The purpose of this guideline is to discourage marketing of caffeine-containing products in a manner that encourages combination with alcohol.

1. NPA members should not advertise, market, or otherwise promote the use of caffeine-containing foods or dietary supplements in combination with alcohol, or to counter the acute or immediate effects of alcohol.

E. Implementation

1. Within twelve months of the effective date, NPA recommends that member companies comply with these guidelines for new product labels put into the market.

Effective Date: June 7, 2013

Adapted from CRN's Guidelines for Industry for Caffeine-Containing dietary Supplements