

## IASC Labeling Guidance

Adopted March 9, 2009

This guidance is required for members selling products manufactured for sale in the United States. It is recommended for products manufactured for sale worldwide.

It is recommended that IASC members label products containing aloe vera according to the following:

- 1) Terms used in the marketing and labeling of aloe vera products comply with the definitions identified in the IASC document “Definitions of Terms Commonly Used in Aloe Industry”, in so far as those terms are included in these recommendations.
- 2) All products (dietary supplements, conventional foods), when using *Aloe vera* (L.) Burm. f. as an ingredient, are labeled using the Standard Common Name (SCN): aloe vera
  - a) The Latin binomial may be utilized after the SCN if desired
    - i) Example: aloe vera [plant part] (*Aloe vera*)
    - ii) Example: aloe vera [plant part] (*Aloe vera* (L.) Burm. f.)
  - b) A synonymous Latin binomial may be utilized after the SCN if desired
    - i) Example: aloe vera [plant part] (*Aloe barbadensis* = *A. vera*)
- 3) Identify the plant part
  - a) Plant part – Leaf
    - i) If the leaf in its entirety is used as the primary or starting ingredient the label identifies the plant part as “leaf”. Use of this term also indicates the ingredient was subjected to processing or treatment(s) to reduce or remove the anthraquinone content.  
(1) Example: “aloe vera leaf”
  - b) Plant part – Inner leaf
    - i) If only the inner leaf is used as the primary or starting ingredient, the label identifies the plant part as “inner leaf”.  
(1) Example: “aloe vera inner leaf”
  - c) Plant part – Aloe latex
    - i) If the aloe latex is used as an ingredient, the label identifies the plant part as “Aloe latex”.
- 4) a) It is suggested that products are not marketed or labeled as “whole leaf”<sup>1</sup> unless the use of additional and accurate descriptive language is included.
  - i) Example: Aloe vera de-colored whole leaf or De-colored whole leaf
  - ii) Example: Aloe vera active charcoal filtered whole leaf or charcoal filtered whole leaf
  - iii) Example: Aloe vera filtered whole leaf or filtered whole leaf

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<sup>1</sup> “Aloe vera, non-decolorized whole leaf extract” was added to the California Proposition 65 list of chemicals “known to the state to cause cancer” in December 2015. To avoid potential confusion as to whether a whole leaf aloe vera ingredient is the chemical listed under Proposition 65, IASC recommends marketers use descriptive language to confirm that the whole leaf ingredient has been decolorized.

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- b) Notwithstanding paragraph 4a above, the IASC strongly recommends that members refrain from marketing or labeling products with the term, “whole leaf”, with or without the use of additional descriptive language. The recommended term for use is “aloe vera leaf – gel/juice/capsules, etc.”
- 5) For products marketed in the US, conventional foods/beverages are labeled with a Nutrition Facts table compliant with 21CFR 101.9 and dietary supplements are labeled with a Supplement Facts table in compliance with 21CFR 101.36.
- 6) Products in liquid form declare the following on labels:
- a) If the beverage is represented to contain aloe vera juice, the percentage of juice is declared by the words "Contains \_ percent (or %) aloe vera juice" or "\_ percent (or %) juice," or a similar phrase, with the blank filled in with the percentage expressed as a whole number not greater than the actual percentage of the juice (e.g., "Contains 50 percent aloe vera juice" or "100 percent juice").
  - b) If the beverage contains less than 1 percent of aloe vera juice, declare the total percentage of juice as "less than 1 percent aloe vera juice" or "less than 1 percent juice".
  - c) If the beverage contains 100 percent aloe vera juice and also contains non-juice ingredients that do not result in a diminution of the juice soluble solids or, in the case of expressed juice, in a change in the volume, when the 100 percent aloe vera juice declaration appears on a panel of the label that does not also bear the ingredient statement, it must be accompanied by the phrase "with added \_\_\_," the blank filled in with a term such as "ingredient(s)," "preservative," or "sweetener," as appropriate (e.g., "100% aloe vera juice with added sweetener"), except that when the presence of the non-juice ingredient(s) is declared as a part of the statement of identity of the product, this phrase need not accompany the 100 percent juice declaration.
  - d) If the product in liquid form is or contains reconstituted aloe vera, the label:
    - i) Declares the percentage of aloe vera
    - ii) States that it has been “reconstituted” or is “from concentrate”
    - iii) Declares water, or other liquids used to reconstitute, as ingredient(s)
- 7) Concentrated aloe vera ingredients and products:
- a) Are labeled in a manner that is truthful and not misleading
  - b) Accurately declare the quantitative concentration level derived from:
    - i) Example: via calculation of solids (200lbs x .5% solids = 1 lb. : reconstitute with 199lbs water = 200X concentrate); or
    - ii) Example: Liquid volume – water volume = concentration; or
    - iii) Other accurate calculations