

## Labeling Guidelines Overview

**Please note that this does not constitute legal advice and Axiom Foods recommends that all finished product manufacturers seek legal review of product labels, including the ingredients panel.**

### **1. Common verbiage which customers will understand must be used**

This is the litmus test by which recommended names must be measured.

For example, technically the brand name "Oryzatein" or "Vegotein" are not recommended for use on ingredient labels because they are not recognized as the common names by consumers. It is okay to use which ever plant name that is preferred: "pea", "split pea", "brown rice", "whole grain brown rice", etc. as the first part of the ingredient name.

### **2. Specifically ingredient names need to identify what something is either a fraction, flavor or color:**

#### **a. A fraction of a whole**

For example, manufacturers should not just label with just "whole grain brown rice". There should always be a clarification of what portion of the rice is being used, thus "whole grain brown rice" needs to be followed by:

- protein
- dairy alternative or dairy substitute\*
- syrup
- etc.

It is not good enough to use a term which references its form such as "whole grain brown rice powder".

\*NOTE: all manufacturers are to be reminded that the term "milk" is a registered term with the dairy industry and it is not advised to be used on sales materials or labels.

#### **b. Being used as a flavor or color**

For example, Oryzatein SG-FE should be labeled "whole grain brown rice protein (natural flavor)". While it is not required to label the ingredients if being used as anything other than protein, etc. they may choose to. For example, while SG-MA would be labeled as a "protein" one could choose to also add (not replace) the words "meat analog".

### **3. Being sold in its powdered or liquid forms**

For example, if Oryzolait, which is normally sold as a powder, is sold in liquid form then the label should read "whole grain brown rice reconstituted dairy alternative"

### **4. If a protein ingredient is even partially hydrolyzed it must be noted in the ingredient name.**

For example, Oryzatein SG-BN products should be labeled as "whole grain brown rice hydrolyzed protein".