

June 3, 2021

The Honorable Tammy Baldwin
Chairman
Subcommittee on Agriculture, Rural Development,
Food and Drug Administration, and Related Agencies
Senate Committee on Appropriations
Washington, DC 20510

The Honorable John Hoeven
Ranking Member
Subcommittee on Agriculture, Rural Development,
Food and Drug Administration, and Related Agencies
Senate Committee on Appropriations
Washington, DC 20510

RE: Fiscal Year 2022 Funding for Office of Dietary Supplement Programs at FDA

Dear Chairwoman Baldwin and Ranking Member Hoeven:

On behalf of the leading trade associations representing the dietary supplement industry—the American Herbal Products Association (AHPA), Consumer Healthcare Products Association (CHPA), Council for Responsible Nutrition (CRN), and United Natural Products Alliance (UNPA)—we write to express collectively our interest in and support of greater funding for the Office of Dietary Supplement Programs (ODSP) within the Food and Drug Administration’s (FDA) Center for Food Safety and Applied Nutrition (CFSAN).

In the United States, more than 170 million consumers use dietary supplements each year as a cost-effective way to take an active role in managing their healthcare. After the passage of the Dietary Supplement Health and Education Act of 1994 (DSHEA), the dietary supplement industry has grown from around \$6 billion in annual sales to over \$55 billion in 2020. This robust growth of the industry reflects not only increased interest among consumers for these products, but also significant advancements in the science of nutrition and wellness. This growth also brings new regulatory responsibilities for FDA to monitor appropriately the marketplace. The ODSP has primary responsibility for oversight of the industry, development of appropriate regulations and guidance, further implementation of DSHEA and establishing enforcement priorities for products that may create a risk to public health.

Our four associations have been consistent and longstanding in our advocacy and support for greater FDA funding to ensure the agency takes strong enforcement action against companies

that illegally manufacture and sell adulterated products. We very much appreciate that the Committee has provided increased funding for this purpose over the past several years. Responsible industry sees adequate funding for the agency as an important step for increasing consumer safety and industry adherence to the law, but also as a demonstration of the government's commitment to eliminating illegal activity and leveling the playing field for the majority of companies already following the law. Therefore, we urge you to provide a \$5 million increase in funding for the FDA Office of Dietary Supplements Programs as a part of your Fiscal Year 2022 appropriations for the Food and Drug Administration. While we fully understand and appreciate the budget pressures the Committee faces, we believe such an increase is warranted given the substantial growth in, and size of, the marketplace and the need to make up for the lapse in inspections and related ODSP activities caused by the pandemic.

Thank you in advance for your consideration of this request. We appreciate your attention to this issue and others related to the health and safety of all Americans, and we look forward to continuing to working with you in the future.

Sincerely,



Michael McGuffin

President

American Herbal Products Association



Scott Melville

President & CEO

Consumer Healthcare Products
Association



Steve Mister

President & CEO

Council for Responsible Nutrition



Loren Israelsen

President

United Natural Products Alliance

The American Herbal Products Association (AHPA) is the national trade association and voice of the herbal and botanical products industry. AHPA is comprised of more than 300 domestic and foreign companies doing business as growers, processors, manufacturers, and marketers of herbs and herbal products, including foods, dietary supplements, cosmetics, and non-prescription drugs. Founded in 1982, AHPA's mission is to promote the responsible commerce of herbal products. Website: www.ahpa.org.

The Consumer Healthcare Products Association (CHPA) is the 137-year-old trade association representing the leading manufacturers and marketers of over-the-counter (OTC) medicines and dietary supplements. Every dollar spent by consumers on OTC medicines saves the U.S. healthcare system \$6-\$7, contributing a total of \$102 billion in savings each year. CHPA is committed to promoting the increasingly vital role of over-the-counter medicines and dietary supplements in America's healthcare system through science, education, and advocacy. Visit www.chpa.org and www.KnowYourOTCs.org.

The Council for Responsible Nutrition (CRN), founded in 1973, is a Washington, D.C.-based trade association representing 150+ dietary supplement and functional food manufacturers, ingredient suppliers, and companies providing services to those manufacturers and suppliers. In addition to complying with a host of federal and state regulations governing dietary supplements and food in the areas of manufacturing, marketing, quality control and safety, our manufacturer and supplier members also agree to adhere to additional voluntary guidelines as well as to CRN's Code of Ethics. Visit www.crnusa.org. Follow us on Twitter [@CRN_Supplements](https://twitter.com/CRN_Supplements), [Facebook](https://www.facebook.com/CRNSupplements), and [LinkedIn](https://www.linkedin.com/company/crnusa).

The United Natural Products Alliance (UNPA) is an international trade association representing many leading natural products, dietary supplement, functional food, scientific and technology and related service companies that share a commitment to provide consumers with natural health products of superior quality, benefit and reliability. Founded in Utah in 1992, UNPA was instrumental in the passage of the 1994 Dietary Supplement Health and Education Act (DSHEA) and continues to take a leadership position in legislative and regulatory issues and industry best practices. Visit www.unpa.com.