

CRN Recommended Guidelines for providing product information to consumers purchasing dietary supplements and functional food via e-commerce

Purpose

CRN and its members recognize that consumers planning to purchase a dietary supplement or functional food product via e-commerce internet platforms should have access to the same information to read, review, compare and make a purchasing decision, as if that consumer was standing in a store and able to hold a physical package and read its labeling. Choosing to purchase these products online should not decrease the ability to obtain product information to make purchasing decisions.

VOLUNTARY GUIDELINES: In addition to compliance with applicable labeling laws and regulations, CRN recommends that its members adhere to the following guidelines for providing the minimum information described below for their dietary supplements and functional food and encourages all producers of these products (manufacturer, packager, distributor, importer, exporter, vendor, retailer and/or labeler; hereafter termed “producer(s)”), to follow these recommendations. These guidelines address the information that is minimally required for display/availability to consumers on internet platforms for the sale of dietary supplements and/or functional food products, which are maintained and controlled by the producer, or product sales pages for third party marketplaces where the display of the product information is controlled by the producer.

Minimum information – NOTE: If the information listed below is identical to the physical package, an image of the product label including the minimum information that is of sufficient size and legibility to be read by the viewer is an acceptable way to provide the information. E-commerce websites should include:

- Name of the product.
- List of ingredients including all dietary ingredients as listed in the Supplement Facts panel and other ingredients.
- List of allergens, i.e., FALCPA allergens¹.
- Net quantity of contents expressed as weight, measure, or numerical count (e.g., pills/capsules/gels).
- The name and address of producer².
- Instructions for use, e.g., dosing instructions, including any warning/cautionary statements that appear on the label.
- If a structure/function claim is made, the FDA DSHEA disclaimer statement in 21CFR101.93(b) should be displayed on the webpage: “This statement has not been

¹ Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA) requires major food allergens to be listed on food and dietary supplement product labels.

² The name and address of the manufacturer, packer, distributor, importer, exporter or vendor should be provided somewhere on the website, preferably on the same page as the product page.

evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.”

- Storage instructions, such as “store in a cool dry place”; “keep refrigerated”.

Implementation

CRN recommends that dietary supplement and functional food companies comply with these within twelve months of the effective date (i.e., by December 31, 2024).

Adopted by the CRN Board of Directors on December 6, 2023.