

SHAPING THE FUTURE OF DIETARY SUPPLEMENTS AND FUNCTIONAL FOOD

# **CRN: CLEAR LEADERSHIP FOR A COMPLEX LANDSCAPE**

COUNCIL FOR RESPONSIBLE NUTRITION | 2025 ANNUAL REPORT

*From our President & CEO, Steve Mister:*

**In a year defined by rapid change** across policy, regulation, and public perception, CRN proactively influenced the environment in which our members compete, innovate, and communicate with consumers, taking swift and strategic action to protect the very existence of the dietary supplement and functional food industry.

**Whether standing our ground in the fight** for commercial free speech, confronting additional state age restriction proposals, advancing constructive engagement with federal officials on tariffs, regulatory enforcement and other key issues, or elevating the industry's voice in critical debates, 2025 was a year of decisive action grounded in science and strategy.

**Our team is grateful to CRN member companies** and their staff that support and engage with our initiatives. This report provides an overview of our important work together.

**Read on, get inspired, and get involved** in the CRN member community.

*See photo captions and links to more report content  
and background at [crnusa.org/2025report](https://crnusa.org/2025report)*



# PERSISTENCE, PATIENCE & PRAGMATISM IN THE AGE OF MAHA

The rise of the **Make America Healthy Again (MAHA)** movement should be a watershed moment for the dietary supplement industry. The emphasis on empowering people, transparency, natural products, whole foods, and individuals taking charge of their own health aligns perfectly with principles our industry has championed for decades.

**But 2025 proved more complex than many anticipated.** While MAHA brought national attention to preventive health and nutrition education, it also introduced new scrutiny, unpredictable policy shifts, and challenges that required strategic navigation and thoughtful engagement with an array of stakeholders.

## Navigating promise & reality in 2025

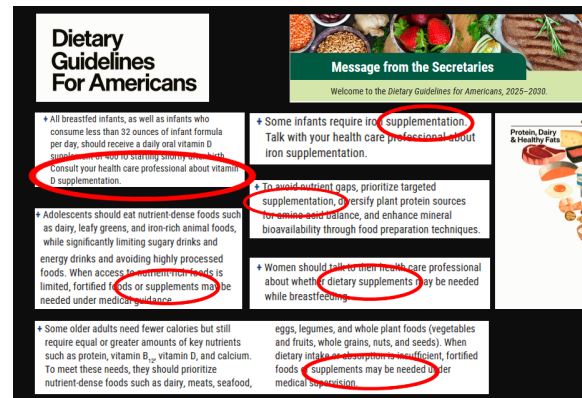
### THE MAHA WISHLIST: WHERE WE FOUND ALIGNMENT

CRN identified clear opportunities to advance shared priorities with the new administration:

- **Dietary Guidelines Recognition:** CRN urged HHS and USDA to “meet people where they are” by acknowledging the role dietary supplements can play in addressing persistent nutrient shortfalls in the 2025–2030 Dietary Guidelines for Americans.
- **FSA/HSA Eligibility:** CRN advanced advocacy to recognize dietary supplements as a “qualified medical expense” in the tax code, which would allow Americans to more broadly use FSA/HSA funds for supplement purchases.
- **Nutrition Education:** CRN supported HHS Secretary Kennedy’s call for comprehensive nutrition education in medical schools—a priority CRN has championed for years.
- **Self-GRAS Transparency:** CRN proposed enhanced accountability in the self-GRAS process rather than elimination of the GRAS (generally recognized as safe) designation, protecting innovation while addressing legitimate concerns.
- **DSHEA Disclaimer Modernization:** CRN advocated for revising the 1997 disclaimer rule to clarify that FDA disclaimers need not appear on every panel.

### SMALL WINS, BIG BATTLES

**Progress came in measured steps.** CRN applauded the 2025 Dietary Guidelines’ acknowledgment of supplements and FDA’s announcement that it intends to exercise enforcement discretion on DSHEA disclaimer label placement. In addition, bipartisan congressional support for FSA/HSA eligibility grew.



**However, MAHA also brought headwinds.**

CRN led the way in addressing renewed scrutiny of self-GRAS determinations, state-level age restriction bills, heavy metal testing mandates, and unpredictable tariff policies that threatened ingredient access and affordability.

## ADDRESSING CONSEQUENCES AT THE STATE LEVEL

**While MAHA advanced the conversation around preventive health nationally, some states moved faster.** In the perceived absence of adequate federal oversight, many state legislatures fast-tracked efforts—often without scientific nuance—with misguided proposals seeking age restrictions, heavy metal mandates, ingredient bans, and additive warnings.

**CRN distinguished genuine consumer protection from compliance burdens** that would inappropriately restrict access to legal, beneficial products.

**CRN’s state-by-state response delivered pragmatic wins** through thoughtful opposition and education, emphasizing that policymaking must be science-backed. See more on page 4.



Julia Gustafson, VP Government Relations, discusses the spate of age restriction proposals in the states during the CRN Member Breakfast Briefing at Expo West.

**“ The dietary supplement industry has always placed our consumer first. It has always asked how it can improve the health and nutrition of our customers. It’s one of the things that attracted me to CRN 20 years ago.**

And since then, I have seen our members advocate for mandatory adverse event reporting and mandatory listing—issues that are more about protecting our consumers than ourselves.

**I’ve watched your commitment to self-regulation**, imposing requirements on yourselves beyond what’s mandated by the law so consumers can have assurance of safe products and appropriate labeling.

I have seen you defend your customers’ right to access safe products; I have watched you champion nutrition for everyone; and observed your investments in consumer education.

**We’ve been about Making America Healthy all along.** And if I can borrow a line from the country music song, (with apologies to Barbara Mandrell):

**We were MAHA even when MAHA wasn’t cool.**

And when you think about our recent requests of the Administration and Congress, it’s still about protecting our consumers:

- **Getting supplements recognized as qualified medical expense for FSAs and HSAs**—so that more consumers can stretch their dollars and make their health regimens more affordable.
- **Improving FDA’s inspection efficiency**, creating a supplement registry, directing investigation priorities towards facilities with the most risk, and cracking down on unlawful products—all to assure our consumers of safe products.
- **Preventing states from imposing misguided age restrictions** on our products so that consumers have access to safe and beneficial supplements.

So I would suggest we are much more aligned with the mission of Making America Healthy than we have been given credit for.”

EXCERPTED FROM PRESIDENT & CEO STEVE MISTER’S ADDRESS TO INDUSTRY AT CRN’S CONVERGENCE ’25

## MARKING A CRN MILESTONE

**2025 marked a milestone with the 20th anniversary of Steve Mister’s leadership** of the association as president & CEO. When he says, “We were MAHA even when MAHA wasn’t cool,” he’s borrowing from an old country lyric and perhaps dating himself—but making a bigger point. Long before “Make America Healthy Again” became a movement, CRN was championing safe products, transparency, consumer access, and responsible regulation. If you’re from Steve’s generation, you’re likely to appreciate the country music reference. If you’re not, know this: **We’re the MAHA OGS!**



CRN’s Steve Mister discusses regulatory priorities with Kyle Diamantas, FDA Deputy Commissioner of Human Foods, during a CRN board of directors meeting.

**“ The early attention of the administration has been focused on reductionist thinking... we need to refocus the conversation now on what consumers are missing from their diets. What people can proactively do to improve and maintain their health...”**



# FIGHTING FOR PRINCIPLES, NOT JUST PRODUCTS

## Defending constitutional rights & ability to innovate

### PROTECTING YOUR RIGHT TO COMMERCIAL FREE SPEECH

**When New York banned the sale of dietary supplements** marketed for weight loss or muscle building to anyone under 18, the law threatened far more than products making certain claims. At stake: the fundamental right to make truthful, science-based claims about legal, safe products—a key component of commercial free speech.

**If government can silence truthful claims without evidence** that such restrictions actually advance public health, no marketing message is safe. No label claim. No scientific validation. Today it's sports nutrition; tomorrow it could be any category of claim based on opinion or emotion rather than facts. That's why CRN is persisting in its litigation in New York to repeal its age restriction law.

**The law improperly uses truthful product claims as a stand-in** for evidence of harm—a dangerous precedent that threatens the entire industry's ability to communicate benefits.

**“ While we are disappointed in the court’s decision not to halt enforcement at this stage, we remain confident in the strength of our constitutional challenge. This law improperly targets truthful, lawful marketing claims about dietary supplements and represents a troubling attempt to regulate speech, not product safety.”**

*CRN SVP and General Counsel Megan Olsen*

### A GOOD START, BUT NOT ENOUGH: INNOVATION VS. MONOPOLY

**Drug preclusion**—the federal statutory provision preventing supplement companies from using ingredients that are approved as a drug or under pharmaceutical investigation—has long created unfair competitive advantages for the drug industry.

**Though FDA responded to industry petitions, including one filed by CRN**, on drug preclusion by allowing NMN back into the market—a narrow victory—the agency declined to address the structural imbalance in the law that prevents fair competition.

**FDA persisted in upholding an interpretation of drug preclusion that allows confidential dates to govern when preclusion takes effect.** These secret investigational new drug filing dates, mean supplement companies don't know when the “race to market” begins. By the time it's discovered an ingredient is precluded, years of dietary supplement research and marketing investment may be wasted, affecting potentially dozens of ingredients.

**CRN is now developing legislation to provide clarity** and restore fairness to protect supplement innovation.

### STATE VICTORIES: PRAGMATIC SOLUTIONS

While defending constitutional principles federally, CRN delivered pragmatic wins at the state level:

**California:** Secured a legislative amendment clarifying that supplements aren't subject to baby food testing mandates and negotiated a workable compromise on SB 646 heavy metals reporting for prenats (see page 7).

**Louisiana & Texas:** Protected melatonin from restrictive legislation.

**Texas:** Exempted supplements from additive warning label requirements.

**Multiple States:** Removed titanium dioxide from restriction bills.

**Massachusetts, Maryland, Michigan and more:** Actively opposed proposed age-restriction legislation targeting supplements marketed for weight loss and muscle-building, holding back proposals based on flawed premises about eating disorders and supplements.



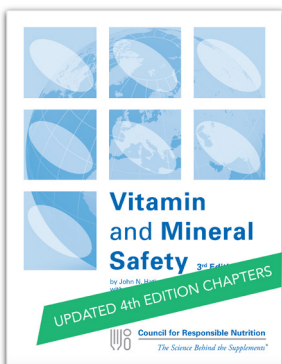
CRN Senior Director, Government Relations Mike Meirovitz and Steve Mister testify in Massachusetts; Mister also testified in Maryland.



Megan Olsen, SVP and General Counsel, leading the team’s New York state age restriction litigation efforts in consultation with law firm Cozen O’Connor, shared updates on the case during the CRN Member Breakfast Briefing at SupplySide Global as well as the drug preclusion issue and CRN’s efforts to secure revisions to FDA’s “DSHEA disclaimer.” Also pictured, CRN’s second annual “Innovation Exchange” event, featuring steering committee-selected presentations on cutting-edge ingredients and technologies.

## SCIENCE, STANDARDS & RAPID RESPONSE

### VITAMIN & MINERAL SAFETY BOOK: GLOBAL BENCHMARK FOR SCIENCE-BASED LEVEL-SETTING



CRN released updated chapters in its Vitamin and Mineral Safety handbook for folic acid (+methylfolate), iron, magnesium, potassium, selenium, vitamin A, B3, B6, E, and zinc, along with a revised methodology chapter to reflect the latest scientific standards. First-time evaluations for choline (including citicoline) and lutein/zeaxanthin/meso-zeaxanthin were also published, alongside a new section on methylfolate and confirmation of vitamin K2’s established safety record.

These new and updated evaluations help ensure that stakeholders have access to current and credible scientific information on the safety of these nutrients.

**“ These updates reflect our commitment to providing transparent, scientifically grounded safety information to guide the dietary supplement industry and international authorities. They are a must-read for nutrition scientists, policy makers in the nutrition field and industry experts.”**

*CRN Chief Science Officer Andrea Wong, Ph.D.*

### NEW TASK FORCES FOR TURMERIC AND GRAS + REGULATORY ENGAGEMENT

CRN convened a **Turmeric Task Force** to consider development of a voluntary program, around formulation and labeling.

CRN launched a **GRAS Task Force and met with FDA** Deputy Commissioner Kyle Diamantas early in the year, then hosted Diamantas for a board meeting fireside chat in Q4 on GRAS rulemaking, drug preclusion, and MAHA influence, in addition to participating in several key meetings with regulatory officials.

### DEFENDING SCIENCE IN THE SPOTLIGHT—CRN’s RAPID RESPONSE TO INACCURACIES

CRN countered flawed research methodologies and alarmist media narratives with evidence-based responses. For example, the science team challenged Clean Label Project’s Protein Study 2.0 for lacking transparency and context and corrected PLOS Mental Health’s misrepresentation of muscle-building supplements and adolescent mental health. CRN also clarified that vitamin A doesn’t prevent measles following reports of some parents administering high doses to their children. This proactive approach—resulting in citations across major outlets—demonstrated industry commitment to scientific integrity while protecting consumers from fear-based narratives that discourage beneficial supplement use.

# BUILDING ON INDUSTRY CREDIBILITY

## WHY PRENATALS MATTER TO EVERYONE

**Prenatal vitamins are often the first supplement** a person takes on a doctor's recommendation. A woman starts prenatal supplementation. She has a healthy pregnancy and baby. She begins reading about family wellness. Soon, the whole household is taking supplements—multivitamins, omega-3s, probiotics, vitamin D.

**This is the prenatal pathway to supplement trust.** When doctors recommend prenatals, they validate the entire supplement category. When women see results during pregnancy—the most health-conscious moment of their lives—they become believers in science-based nutrition. When media or legislators attack prenatal supplement safety, they threaten not just one product category but the gateway to industry credibility.

**That's why CRN's 2025 prenatal work wasn't just defensive**—it was strategic investment in the foundation of consumer trust.

## Prenatals: Where trust begins

### REACHING THE GATEKEEPERS: PRACTITIONERS AT ACOG

**The CRN Foundation championed prenatal nutrition** at the 2025 American College of Obstetricians and Gynecologists (ACOG) Annual Clinical and Scientific Meeting—directly engaging the healthcare practitioners who influence women's supplement decisions.

**CRN delivered evidence-based education** on nutrient adequacy, the role of supplements in closing nutritional gaps, and the science behind prenatal formulations. We equipped OB/GYNs with tools to counsel patients confidently—countering misinformation while reinforcing the medical community's trust in our category.



CRN member Susan Mitmesser, Ph.D., and CRN Chief Science Officer Andrea Wong, Ph.D., presented at an NIH workshop "Prenatal Dietary Supplements: Evidence Gaps and Research Needs."

CRN convened members for a booth and educational session at the ACOG Annual Clinical and Scientific Meeting.

# STABILIZING A FRAGMENTED BUSINESS ENVIRONMENT

## TARIFFS & TRADE: NAVIGATING UNCERTAINTY

With tariff rates shifting throughout 2025, CRN provided members with regular updates and insights along with strong advocacy. CRN:

- **Engaged the office of the U.S. Trade Representative (USTR) and White House National Economic Council** on exemptions for ingredients that cannot be produced domestically at scale.
- **Retained a consultant as a no-cost to members resource** on tariff questions—Brooke Ringel, of Kelley Drye & Warren.
- **Presented webinars** on Section 232/301 actions, CBP enforcement, and *de minimis* reforms.
- **Partnered with IADSA** on global supplement policy alignment with USDA.



Luke Huber, N.D., provides an update on tariffs during the CRN Member Breakfast Briefing at SupplySide Global.

## TURNING THREAT INTO EDUCATION: CALIFORNIA'S HEAVY METAL TESTING LAW

When California mandated public posting of raw heavy metal test results for prenatal vitamins (SB 646), CRN faced a choice: fight the law entirely and likely lose, shutting down any chance at educating legislators, or shape it into something workable. We chose pragmatism—and nuance.

**The Threat:** Raw test results without scientific context could unnecessarily scare consumers away from important health products. Detectable levels of lead, cadmium, or arsenic would appear alarming—even though heavy metals are ubiquitous in food and the environment, and trace amounts are not dangerous. Worse, companies might strip essential nutrients like iron or calcium from products to make test results look “cleaner,” undermining the very purpose of prenatal supplementation.

### CRN's Negotiated Solution:

- **Removed the QR code** label requirement, keeping information online only.
- **Changed monthly testing to lot testing**, aligning with existing Good Manufacturing Practices (GMPs).
- **Most importantly: Required mandatory educational language** on testing websites explaining the unavoidable presence of minute heavy metal levels and providing scientific context.

As CRN warned in a **Capitol Weekly op-ed**, the law could have unintentionally discouraged women from taking prenatal supplements during the most critical developmental window. CRN's compromise protects both consumer understanding and nutrient adequacy—imperfect, but workable, and better than the alternative.



## COMBATING MISINFORMATION WITH SCIENCE

Throughout 2025, CRN pushed back against alarmist allegations about “detectable” levels of contaminants in supplements such as prenatals and protein powders—from the California's SB 646, to the Clean Label Project's lack of transparency, to Consumer Reports' protein powder testing. CRN's message was consistent:

- **Heavy metals are ubiquitous** in food and the environment.
- **Trace, detectable levels are not dangerous**—context matters.
- **Supplement manufacturers are required under FDA GMPs to test for contaminants** and ensure compliance with federal standards.
- **Public health is harmed** when women are scared away from beneficial prenatal supplements.

CRN's media response—cited in CNN, Today, NPR, and syndicated coverage—provided the scientific counterweight to sensationalism, protecting not only protein, but the prenatal gateway that so often leads consumers to trust supplements to support their health.



# THE BUSINESS CASE FOR GOOD CORPORATE CITIZENSHIP

## WHY MEMBERSHIP IN CRN MATTERS

Our work at CRN—from constitutional litigation to FDA meetings, state-level advocacy to member collaborations on voluntary guidelines—uniquely supports and protects our members' ability to compete, innovate, and communicate with consumers while being good corporate citizens upholding best practices. When companies support CRN, they support their own future.

## Convening a community committed to responsible growth

### DAY ON THE HILL: MAKING OUR VOICE HEARD

CRN brought industry executives to Washington in June for meetings with lawmakers after engaging 79 freshman offices earlier in the year. Industry leaders advocated for HSA/FSA eligibility, drug preclusion reform and tariff relief. In addition, the Congressional Dietary Supplement Caucus was re-established, with CRN leading educational lunch briefings for Hill staff.

**“ CRN’s Day on the Hill is a powerful reminder that science-driven policy and strong regulatory frameworks begin with honest, constructive conversations. We appreciate the many members of Congress and staff who welcomed our members and listened with interest to the issues that matter most to the millions of Americans who rely on dietary supplements for better health.”**

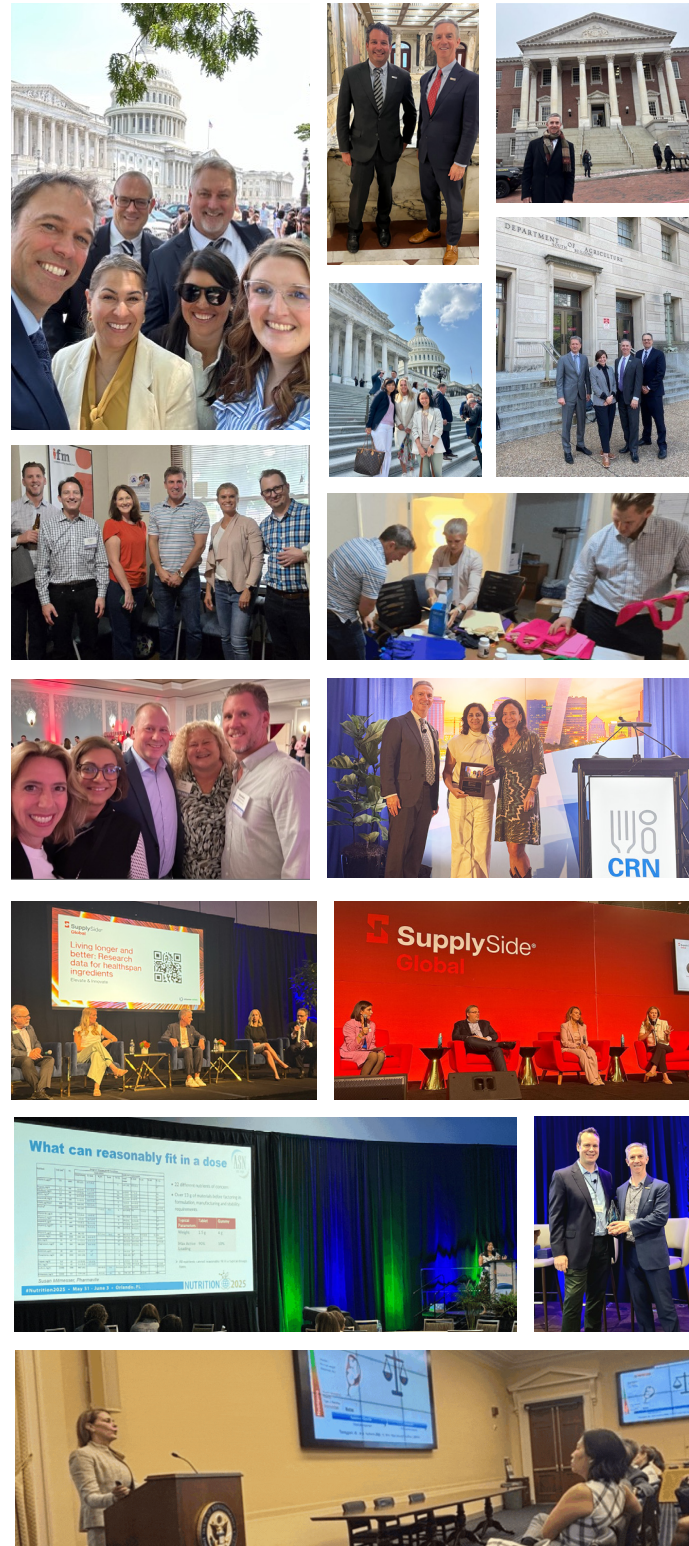
*CRN President & CEO Steve Mister*

### MEMBER EDUCATION & NETWORKING

CRN educational offerings included webinars on GLP-1 opportunities from our Sports & Active Nutrition Forum, AI applications in development and operations, compliance roadmaps for California SB 646 (heavy metals) and SB 343 (recycling), tariffs, and more. CRN’s Retailer Relations Forum breakfast at NACDS featured insights from Sam’s Club, Kinney Drug, and Circana. The annual Legal, Regulatory, and Compliance Forum and CONVERGENCE ‘25 with WellComms, Science in Session and Innovation Exchange convened key stakeholders for conversations that moved the industry forward. Plus breakfast briefings at Expo West and SupplySide Global provided additional opportunities to connect.

### CRN FOUNDATION ACCESS INITIATIVE

The CRN Foundation’s partnership with the National Association of Free and Charitable Clinics (NAFC) expanded nutrition education and supplement access to underserved populations.



See photo captions and links to more report content and background at [crnusa.org/2025report](http://crnusa.org/2025report)

