

August 31, 2022

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**Re: CRN Comments on Draft ODS Strategic Plan 2022-2026**

The Council for Responsible Nutrition (CRN)<sup>1</sup> is pleased to submit these comments in response to the Office of Dietary Supplements (ODS) Five-Year Strategic Plan for 2022-2026.

*Are there emerging public health issues that ODS can help address?*

- We recognize ODS's efforts to create the "Dietary Supplements in the Time of COVID-19" fact sheets and update these sheets as new research emerges. We encourage ODS to continue regularly updating the fact sheets when new information becomes available. For vitamin D in particular, we are aware of numerous studies that have been conducted since the beginning of the pandemic, or are currently in progress, that demonstrate a relationship between higher vitamin D levels and a lower incidence or severity of COVID-19. CRN has been closely monitoring this research on vitamin D and COVID-19 for the CRN Foundation's educational campaign, [Vitamin D & Me!](#). We strongly encourage ODS to include these new research findings in its education.

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<sup>1</sup> The Council for Responsible Nutrition (CRN), founded in 1973 and based in Washington, D.C., is the leading trade association representing dietary supplement and functional food manufacturers and ingredient suppliers. CRN companies produce a large portion of the dietary supplements marketed in the United States and globally. Our [member companies](#) manufacture popular national brands as well as the store brands marketed by major supermarkets, drug stores and discount chains. These products also include those marketed through natural food stores and mainstream direct selling companies. CRN represents more than 200 companies that manufacture dietary ingredients and/or dietary supplements, or supply services to those suppliers and manufacturers. Our member companies are expected to comply with a host of federal and state regulations governing dietary supplements in the areas of manufacturing, marketing, quality control and safety. Our supplier and manufacturer member companies also agree to adhere to additional voluntary guidelines as well as to CRN's Code of Ethics. Learn more about us at [www.crnusa.org](http://www.crnusa.org).

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*Are there existing knowledge gaps that ODS can help address (not included in the current plan)?*

- Although mentioned briefly in the draft strategic plan, dietary supplement use and its contribution to meeting the unique nutrient needs in lactating women is under-researched. ODS could conduct or support research in this area and educate consumers and healthcare providers on the different nutritional requirements during the post-partum period compared to during pregnancy. The recent [Dietary Guidelines for Americans 2020-2025](#), issued jointly by the U.S. Department of Agriculture and U.S. Department of Health and Human Services, identifies some of these differences. Consumers and healthcare providers could be guided to look for appropriate supplements to address these requirements.
- ODS mentions health promotion in the draft strategic plan; however, health promotion is not defined, nor are the outcome measures that would be indicative of health promotion. We recommend that through interagency efforts, ODS contribute to establishing a definition of health promotion and the measurable outcomes used to demonstrate it.
- We applaud ODS for establishing the Trans-NIH Resilience Working Group to look beyond reducing illness and focus on how to enhance health and lengthen life. The benefits of nutrients and bioactives have traditionally been assessed through the lens of correcting deficiencies or preventing disease, but research shows that they can play important roles in health promotion, healthy aging, and active lifestyle throughout the age spans. However, scientific consensus on a research paradigm on how to assess optimal health is lacking. We encourage ODS and the Working Group to support the development of such a research paradigm.

*Is there anything that ODS can do differently to meet the needs of its stakeholders?*

- ODS provides educational materials to health professionals through fact sheets and other materials on their website. Additionally, ODS offers a dietary supplement research practicum to academics, doctoral students, and postdoctoral fellows; healthcare practitioners; and other professionals with advanced biomedical degrees. While the information is useful, it may not reach the healthcare provider community broadly unless these professionals proactively seek it out. We recommend that ODS target educational outreach to healthcare providers, including doctors, physician assistants, nurse practitioners, pharmacists, and others who regularly counsel their patients about nutrition, diet, and supplement usage, who generally do not receive adequate education on nutrition and dietary supplements.
- We commend ODS for providing fact sheets as a resource for health professionals and consumers. These fact sheets, and other information on the ODS website, should be regularly updated to reflect the evolving science on various dietary supplement categories. For example, there is a growing body of research on the effects of probiotics on different health endpoints beyond the few that are listed on the Probiotics Fact Sheet. Probiotics are a popular category of dietary supplements, and it is important for consumers and health professionals to have access to accurate, up-to-date information that reflects the full range of potential health benefits.
- As industry is an important stakeholder in the dietary supplement space, we recommend that specific language is developed in the strategic plan on how to develop and maintain two-way communication and potential partnerships with industry members. Much of the language is one-way, coming from ODS to industry, but does not appear to be encouraged from industry to ODS, beyond commenting on the strategic plan. Having an industry advisory council with

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members from both smaller and larger companies, as well as trade organizations, could support continuous two-way communication. It would also be helpful to have industry partners involved in consumer education campaigns, which could be bolstered by academic-industry partnered research on various supplements.

- ODS is the only government-funded office (likely in the world) that supports and funds research, tools, and education focused on dietary supplements. While we recognize that the stakeholders of ODS are in the United States, we recommend that ODS, to the extent possible, extend its efforts globally to help other governments establish similar entities in other countries.

Thank you for this opportunity to provide our feedback.

A handwritten signature in black ink, appearing to read "Andrea Wong". The signature is fluid and cursive, with a large, stylized initial "A" and "W".

Andrea Wong, Ph.D.

Senior Vice President, Scientific & Regulatory Affairs