

CRN Q2 2022 ACCOMPLISHMENTS

2022's second quarter was packed with activity and collaboration among CRN's cross-functional teams to:

- Address legislative, regulatory, and communications challenges;
- Promote science in support of the dietary supplement and functional food marketplace; and
- Foster education, problem solving, collegiality and networking among our members.

Some examples of how CRN worked for you in Q2 include:

Continued negotiations on MPL

Q2 began with the formal introduction of mandatory product listing (MPL) legislation in the senate with S 4090, the Dietary Supplement Listing Act of 2022. In June, CRN objected to missing protections for supplement marketers when new MPL language was included in the in FDA Safety and Landmark Advancements Act. CRN's government relations team continues negotiations on Capitol Hill and remains steadfast to secure responsible MPL for dietary supplements. CRN's board of directors gave direction during its June 16 meeting that CRN should only support legislation includes the key protections.

Responding to FDA on NDIs, drug preclusion, and enforcement

In response to FDA's most recent draft guidance that offers "amnesty" for new dietary ingredient (NDI) notifications, CRN noted too many unanswered questions remain on NDIs—and too little consequential enforcement by FDA—for the promise of amnesty for unfiled notifications to have a meaningful effect. CRN is submitting comments on the agency's most recent draft guidance.

On n-acetyl-cysteine (NAC), CRN disagreed with FDA's overly expansive interpretation of the drug preclusion provision. CRN noted the retroactive application of the clause is misplaced and sets a dangerous precedent for the agency to remove other lawful dietary ingredients from the market based on assertions of pre-1994 drug approvals or clinical investigations. CRN contacted retailers to alert them to FDA's promise of enforcement discretion to allow NAC products to return to the market.

Protecting proprietary blends while responsibly labeling

CRN published a new self-regulatory document, "Regulatory Responsibilities and Best Practices for Proprietary Blends," to help ensure consumers are not misled about the quantity of individual ingredients. The new program offers recommendations to industry for best practices while observing the regulatory requirements for these products.

Fighting age restrictions in the states

CRN succeeded in holding back state legislation that would have imposed onerous restrictions on supplements in Rhode Island. The government relations team continues to work to narrow the scope of remaining troublesome bills in play and to remove their most burdensome aspects, such as behind-the-counter requirements. CRN continues to monitor active bills in California, Massachusetts, and New Jersey and New York.



Published bylines

CRN placed the following pieces, with a focus on MPL in the second quarter:

Op-Ed: 80% of Americans take dietary supplements. Better oversight and safety are musts
Steve Mister, *Indy Star*, May 2022

Mandatory Product Listing: It Won't 'Wash the Windows' Either!
Steve Mister, *NutraIngredients-USA*, May 2022

Ignore the Red Herrings: Myths & Facts about Mandatory Product Listing
Steve Mister, *Nutraceuticals World*, May 2022



More

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Promoting 'the science behind the supplements' and its role in policymaking

CRN commissioned and published a review paper on the safety of popular weight-management supplement ingredients. The article responds to unfounded concerns about the safety of these products and can be shared with stakeholders, including state legislators to bolster their opposition to proposals to place age restrictions on these ingredients.

Proceedings from the CRN-International 2021 symposium, Women's Health: Optimal Nutrition Throughout the Lifecycle, were published in the Journal of European Nutrition. The authors gave recommendations for improving current entitlement programs.

CRN's Senior Scientific Advisory Council hosted its second Toxicology Workshop—Assessing the Safety of Ingredients in a Formulation.

CRN submitted comments reinforcing the role of supplements for inclusion in the 2025-2030 Dietary Guidelines for Americans. This forthcoming government publication follows up on the 2020-2025 edition, which included several of CRN's recommendations and recognized "nutrients of concern".

CRN's Health Care Practitioner Forum hosted National Center for Complementary and Integrative Health (NCCIH) research head Craig Hopp, Ph.D., as a guest speaker.

Pushing back on the press and putting the headlines into context

CRN spoke out to clarify misinterpretation of the U.S. Preventive Services Task Force Guidance on Multivitamins that proliferated in the headlines, appearing in first-day coverage from CNN and HealthDay News.

CRN debunked inaccurate headlines on melatonin "poisoning" in children and put the mischaracterized CDC numbers into context with data on increased sales of the ingredient.

CRN put into perspective a Journal of Clinical Pharmacology review of data on adulterated products marketed as dietary supplements identified in FDA's database.

CRN's Communications team has reinvigorated its systematic media outreach with increased responses to reporting that mischaracterizes supplements as "unregulated."

Q2 Press Releases

MARCH 31

CRN dismisses FDA response on NAC

APR. 11

Mister and Falsani to Co-Chair ACI/CRN's Dietary Supplements Forum

APR. 21

CRN Responds to FDA Draft Guidance on NAC

APR. 25

CRN Mourns Passing of Senator Orrin Hatch

APR. 26

Durbin, Braun Introduce Legislation to Improve Safety and Ensure Transparency of Dietary Supplement Industry

MAY 4

Journal Review Mischaracterizes Majority of Dietary Supplement Products

MAY 13

CRN Responds to FDA Consumer Update on Bodybuilding Supplements

MAY 19

CRN Responds to FDA's NDI Announcement

MAY 27

CRN Objects to Missing Protections in FDA Safety and Landmark Advancements Act

JUNE 6

Publications Spotlight Important Nutrition, Lifestyle Considerations for Women Across the Life Course

JUNE 8

CRN Debunks Inaccurate Headlines on Melatonin 'Poisoning' in Children

JUNE 14

CRN Steadfast to Secure Responsible Mandatory Product Listing for Dietary Supplements

JUNE 21

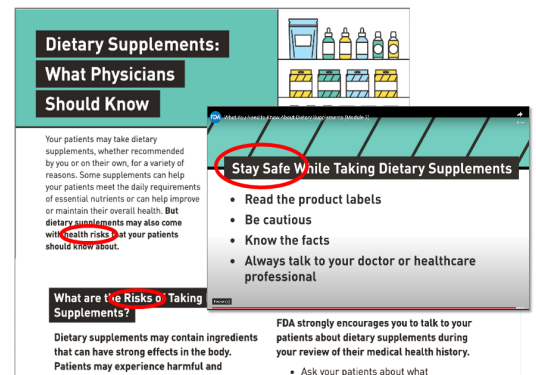
CRN Responds to U.S. Preventive Services Task Force Guidance on Multivitamins

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Addressing part of the root of why we have these press issues—FDA’s portrayal of supplements

CRN met with FDA Office of Dietary Supplements head Cara Welch, Ph.D., to express concerns about the agency’s newly launched “Supplement Your Knowledge” educational materials for consumers, students, and health care professionals. (FDA has partnered with the American Medical Association and offers continuing education credits for health care professionals.) FDA’s new materials along with its website content on dietary supplements overstates potential risk in contrast to benefit. The lack of collaboration with industry has resulted in missed opportunities to better educate consumers about the benefits of supplements to fill nutrient gaps identified by government data. CRN is preparing a dossier of feedback for the agency detailing instances in which risk is overstated or supplements are otherwise mischaracterized. CRN seeks to open a dialogue with FDA about updating its content to better serve consumers.



Nutrition Access Task Force launches Chairman’s Challenge to #Act4Access

CRN members are joining together as part of the CRN Foundation’s Nutrition Access Task Force #Act4Access program to take concrete action to fight hunger between now and September, Hunger Awareness Month. The Board adopted a resolution endorsing the #Act4Access campaign that urges all CRN members to participate in this initiative and report their individual successes to CRN for a collective announcement. The task force also convened a scientific advisory board and developed documents to help stakeholders understand why dietary supplements should be part of nutrition access programs.



‘Supplemental’ blog provides platform for pushback, unique takes

CRN’s launched a blog, “Supplemental,” as platform for unique takes on supplement industry issues and a place where members can also demonstrate their thought leadership—as well as push back on detractors. The blog already has a variety of posts from CRN staff and members on topics from MPL, to blockchain, the importance of supporting science education, and more.

Proactive communications

The CRN Foundation’s Vitamin D & Me! website continued to promote key research on vitamin D and COVID-19 and refreshed content including video clips with scientist interviews. CRN will reach dietitians with information on Vitamin D & Me! and the value of supplements through participation at the Shopping for Health event in late July.



CRN shared consumer tips in conjunction with its press release on adulterated products marketed as dietary supplements.

CRN continues to work with external PR consultants to generate science-based positive stories for the supplement industry, with more than 30 placements in Q2 on topics from COSMOS, vitamin D, collagen, omega-3, and more.

See www.crnusa.org/myCRN to view the latest for CRN members on our website.

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Educating members and other industry stakeholders and building community

CRN presented the 10th annual Legal, Regulatory, and Compliance Forum with the American Conference Institute, including fireside chats with FTC's Associate Director for Advertising Practices Serena Viswanathan and FDA's Dr. Cara Welch, and strategic insights from experts on topics such as NAC, drug preclusion, NDI notifications, adopting harmonized supplement testing requirements and more.

The CRN-hosted webinar, "ABCs of Children's Supplements: Playing Smart with Advertising, Scientific Substantiation, and More," convened co-director of the C.S. Mott Children's Hospital National Poll, and representatives of the BBB National Advertising Division, Children's Advertising Review Unit, and Children's Food and Beverage Advertising Initiative.

CRN opened registration for our fall events, Science in Session and Now, Next, Oct. 11-14 at the Arizona Biltmore.

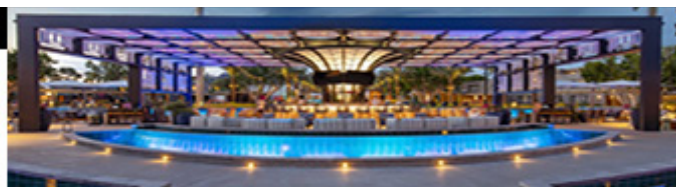


ABCs of Children's Supplements:
Playing Smart with Advertising, Scientific Substantiation, and More

WEBINAR | WEDNESDAY JUNE 1 2-3 PM ET

JOIN CRN AT THE ARIZONA BILTMORE OCT 11-14

SCIENCE In Session | NOW NEW NEXT



International updates

CRN connected with NOAA, FDA, and the U.S. Department of Commerce to secure an extension of NOAA's health certificate program for exports of fish-oil containing supplements. NOAA announced in April it would be discontinuing the program.

CRN advised members to be prepared to demonstrate analytically the low to zero levels of mineral oil aromatic hydrocarbons (MOAHs) in their encapsulated products. Potential safety concerns involving MOAHs are being raised in the EU with the potential to restrict sale of these items in Europe.

Developing relationships and alliances

CRN continues to build credibility with the Department of Defense (DoD) and is working to revise some of these materials on the website, "Operation Supplement Safety."

SVP Communications Brian Wommack spoke at the Office of Dietary Supplements (ODS) Dietary Supplement Research Practicum

CRN joined member companies Abbott and ADM in support of the University of Illinois at Urbana-Champaign's 2022 Nutrition Symposium, demonstrating the association's commitment to educating future nutrition scientists.

CRN is a sustaining partner of the American Society of Nutrition (ASN) and the annual CRN-supported Mary Swartz Rose awards for senior and young investigators were announced at ASN Nutrition 2022.



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