

I'll be there for you. The theme song from "Friends."

Who can forget Phoebe's Smelly Cat? Or the demise of Ross and Rachel—were they on a break, or was it a break up? Or when Ross said Rachel's name at his wedding with Emily?

It's hard to believe it's been 25 years since the beginning of Friends. Even harder to believe it's been 25 years since the passage of DSHEA. But even as we celebrate this silver anniversary, the question today is still the same as it was for Monica, Chandler and the rest of the gang. Who will be there for you? CRN, of course.

I have to admit being somewhat surprised—even disappointed—at Supply Side West a few weeks ago when another trade association executive said the problem with the dietary supplement industry is that "No one has a goal. What's the goal? What's going to happen in the next 25 years? What do we want that to look like? Conversations need to focus on clear goals....," he added, "...there's not a lot of clarity and there's not a lot of discussion."

I was surprised because, ... well ... he's certainly never been to a CRN board meeting. We have a well-articulated vision for the next 25 years and clear set of goals to get us there. So I thought I would start my remarks today with a re-articulation of who we are, and what we want. For our newer attendees, these will sound new, but for our older members, you will recognize them from the strategic planning process we conducted in 2017.

CRN's vision of the world is one in which science-backed dietary supplements and functional food are universally accepted and trusted as essential choices for consumers to achieve and maintain good health and wellness.

We envision a future in which nutritional products are recognized globally as promoting health and wellness by providing nutrition and health preservation, helping to prevent or reduce the risk of disease and promoting a longer, more vibrant healthspan as well as a lifespan.

Consumers and retailers are confident in the quality, the safety and the benefits of dietary supplements and functional food. In our vision, the nutritional products industry is viewed as a trusted and transparent source for high quality products and health information about these products. The healthcare industry, scientific community and regulatory decision makers accept and endorse the benefits of these well-made nutritional products. Appropriate enforcement assures consumers of the safety and scientifically-established benefits of nutritional products while maintaining wide access and self-selection for these products.

And when it comes to CRN's role in this seemingly utopian world, we have some equally ambitious views on that too:

CRN will be recognized as a leader of industry, a trusted voice for nutrition and wellness, and a reliable source for information, research, and education. CRN's influential leadership supports and advocates for widespread understanding of the safety and essential benefits of nutritional products for individual wellness and the health of society. CRN is representative of all segments of the nutritional products industry and is viewed by all interested stakeholders as a positive and proactive resource for communicating the benefits and safety of nutritional products to the public.

That's our vision.

So when I hear an association executive say we lack goals, or a view of the future, I know they haven't been around CRN.

Now how we get there is just as important, so again, let's turn to CRN's strategic plan for a roadmap of how we do just that. We have 5 strategic objectives:

*1. Promote and expand self-regulatory initiatives that demonstrate an industry-wide commitment to accountability and responsible behavior to maintain and improve consumer confidence.*

*2. Influence public policy by building and maintaining a positive legislative, regulatory and commercial environment for nutritional products to foster consumer confidence and industry growth.*

*3. Foster excellence in nutrition science by identifying and promoting best practices in the design, execution, interpretation and acceptance of research that evaluates the benefits and safety of nutritional products and their ingredients.*

*4. Improve the public perception and understanding of the safety and benefits of science-backed nutritional products to promote a positive industry image.*

*And 5. Become a valuable provider of programs and services that educate and promote compliance with regulation and encourage member collaboration, while generating necessary resources for CRN.*

That's the CRN playbook, and everything we decide to do—or decide not to do—gets evaluated against these objectives.

In addition, we take our reputation and credibility very seriously. After all, at CRN, RESPONSIBLE is our middle name. And we live that out.

Responsible...in how we conduct ourselves before stakeholders, retailers and the media.

Responsible...in how we handle our finances... and in our governance of the association itself.

Responsible...in self-regulation to demonstrate we put our consumers first.

Responsible...in deliberations of policies and evaluating the alternatives before selecting a course of action.

Responsible...in soliciting member viewpoints and recommendations...and in reaching consensus.

Responsible...in presenting science accurately and objectively.

Responsible...in working with policy makers in ways that heighten our own credibility and make them more likely to seek our counsel in the future.

In other words, Responsible ... in everything we do.

Which brings me to the issue we are facing today: over the past year, we are finding ourselves increasingly at odds with some of our other industry associations. So where does that leave us?

Should CRN actively push forward with legislation or policies that we know other associations will oppose?

Should we actively work to halt the efforts of another group whose actions we believe are detrimental to the industry?

How should we resolve the differences of opinion when everyone seems to be more and more dug in on their positions?

Even more concerning is that we find our members are often also members of these other organizations. So what I'm talking about here is not the problem of trade association consolidation or fragmentation — that's an issue this industry has wrestled with for as long as DSHEA has been around. Rather, it's trade association opposition — groups who are actively working against one another, being supported, in some cases, by many of the same companies. It's a waste of your resources, and terribly damaging to the image and influence of the industry.

Many of you are paying dues to multiple associations. So who speaks for you? Let me give you some pressing examples:

The first is mandatory product listing. Here we have a problem because the trade associations are at odds. The CRN decision to support mandatory listing is based not only on our experience with the Supplement OWL, but also on a thoughtful and deliberative process within our Board of Directors that led them to conclude that the heightened transparency created by a public listing of labels and products best serves our members and the industry.

But the American Herbal Products Association is equally adamant in its opposition to mandatory product listing. Now I do appreciate that Michael McGuffin, AHPA's president, is here with us today and I have great respect for Michael and I value the candor we can have with another.

And I'm sure that AHPA has gone through an equally thoughtful and deliberative process but reached a different conclusion — to oppose giving FDA authority to create a mandatory listing. But at the end of the day, we find ourselves on opposite sides. That can't be good for the industry.

What I find particularly troubling here is that the reasons being used to oppose the mandatory listing seem counter to the reasons this industry overwhelmingly supported the mandatory adverse event reporting law back in 2006. The resistance insists that there is not really a problem that a mandatory listing can solve. And despite FDA asking for this authority, as you heard Mr. Schiller reiterate here again this morning, the opposition raises the fear that FDA will weaponize the information it gets from a listing of products and labels.

And they argue that mandatory listing is too much of a burden despite the experience we have had with the Supplement OWL that companies large and small can enter their labels.

So what do we do?

Here's another example: and it's related to CBD. The Natural Products Association is pressing for FDA to set a maximum safe level for CBD before it allows any supplements into the market. The other associations, including CRN, are urging FDA to use its discretion to give a green light to legally market these products and then require each manufacturer to demonstrate the safety of its own product through the NDI or GRAS notification. In our estimation, we are more likely to create a framework that fosters innovation and rewards safety research if each company has to justify its own dosage levels. Left to develop its own safety level, FDA is likely to produce a

maximum number far lower than we would want, and unlikely to increase it as the research evolves.

It's not good for the industry to have associations taking such divergent positions, or to have one group verbally assaulting the others or even Members of Congress they disagree with.

And even among the associations that do support a product by product approach for CBD, there is disagreement whether the pathway forward on CBD should be broad enough to consider GRAS declarations and GRAS self-affirmations to demonstrate safety, or should it be narrowly confined to NDI notifications only?

And lastly, there's the issue of probiotics. The International Probiotics Association continues to urge support for a proposal at Codex from Argentina that would set into motion a process to develop harmonized probiotics guidelines at the international level.

It would establish eligibility criteria at the international level for what it means to promote human health and wellbeing, as well as international criteria for determining the quality of these products and their labeling. We see this as creating a potential trade barrier to give a few companies unfair advantage.

So as we go into the Codex Nutrition committee meetings in Dusseldorf at the end of this month, we find CRN, IADSA — the International Alliance of Dietary Supplement Associations, and several other national industry associations on one side of the debate, and IPA on the other.

So three policy issues of tremendous importance to the industry, and three situations where the trade associations find themselves fighting each other. What does that say about our visions for the future?

Now I don't mean to suggest that the CRN position is infallible, or that the opposing views are wrong, or even that CRN's Board can't change its mind. But what I can say is that the CRN position in each of these matters is the result of open discussions among our members, debate in our committees and Board and the strong desire to do what is the best thing for the entire dietary supplement industry and our consumers. We follow our members' direction. And our members have been rather clear in their expectations that we carry their message and viewpoints forward to move the needle.

These are issues members are going to have to reconcile or else we will be working against ourselves. And as our members, you deserve to understand what's happening behind closed doors. As I said last year, you joined CRN to be in the room where it happens.

What I do know is that in the words of Abraham Lincoln, a house — or should I say, an industry — divided against itself cannot stand.

My question to you is if you are a member of another trade association, are you sure you know what it is advocating for? Be sure it aligns with your values, your company's culture and the policy direction your company advocates for.

Let your voice be known. If you are paying dues, you have a right to a voice, and if the association does not speak for you, you should be asking why not?

2019 CRN Annual Conference -- President's Address  
Steve Mister  
Nov. 7, 2019

Who listens to you? Who speaks for you? Who will be there for you? Those are questions “Friends” asked us 25 years ago. These are questions worth asking today.