



Council for Responsible Nutrition

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April 26, 2022

The Honorable Richard J. Durbin
United States Senate
711 Hart Senate Building
Washington, D.C. 20510

The Honorable Mike Braun
United States Senate
404 Russell Senate Office Building
Washington, D.C. 20510

Dear Sens. Durbin and Braun:

On behalf of the Council for Responsible Nutrition (CRN), the leading trade association representing dietary supplement and functional food manufacturers and ingredient suppliers, I am writing to express our enthusiastic support for legislation you introduced today, the Dietary Supplement Listing Act of 2022. CRN member companies produce a large portion of the dietary supplements marketed in the United States and globally. Your legislation provides additional transparency to the Food and Drug Administration (FDA) and consumers about dietary supplement products on the market and promises to increase the already considerable trust in the dietary supplement marketplace.

CRN has led the dietary supplement industry in advocating for a federal mandatory product listing program housed at the FDA. In April 2017, CRN launched the *Supplement OWL*® (Online Wellness Library), a voluntary (though mandatory for CRN members) database comprised of over 12,000 labels of dietary supplement products currently in the U.S. market. CRN's *Supplement OWL*® is a first of its kind, self-regulatory tool that CRN championed to create a rich and more complete picture of the marketplace for consumers, businesses, and regulators. The *Supplement OWL*® serves as a resource for the FDA, registry users, and consumers to identify products, their ingredients, and the companies who market them.

CRN requires its members to submit their respective product labels to the *Supplement OWL*® as a condition of membership, and the registry has continued to grow, with both CRN members and non-members entering new products every month. This registry has demonstrated the ability of companies, both large and small, to provide product labels and general information about their products as a routine part of bringing their products to market without being overly burdensome or an obstacle to introducing new supplements. Quite simply, the registry is a birth certificate, not a driver's license.

FDA cannot regulate what it cannot see. That's why CRN strongly supports the Dietary Supplement Listing Act of 2022. It creates a similar mandatory repository of supplement labels—something FDA needs to appropriately oversee this industry—without becoming a barrier to entry. This legislation will provide FDA and consumers a more complete understanding of the marketplace and the range of products and ingredients currently marketed as dietary supplements. In addition, this new registry should assist FDA in taking enforcement actions against irresponsible companies marketing products as dietary supplements inappropriately.

CRN also wants to recognize the time and energy that Jessica McNiece, Robert Spivey, and Maddie Davidson dedicated to working with us to develop this bipartisan bill. Their efforts were instrumental in advancing a well-designed bill that both industry and consumer organizations can support.

Sens. Durbin and Braun
April 26, 2022

CRN is pleased to offer its support to this measure and looks forward to working with Congress and the administration to ensure this bill is enacted into law.

Sincerely,

A handwritten signature in blue ink that reads "Steve Mister". The signature is written in a cursive style with a prominent initial "S" and a long, sweeping underline.

Steve Mister
President and CEO,
Council for Responsible Nutrition