AHPA
AMERICAN HERBAL PRODUCTS ASSOCIATION

February 10, 2015

Letter to the Editor

Times Union
Submitted via email to: tuletters@timesunion.com

Dear Editor:

The American Herbal Products Association (AHPA) and its members are dedicated to ensuring consumers have access to high-quality herbal products. Unfortunately, your article ("Study finds lies on labels of some herbal supplements," *Times Union*, Feb. 3, 2015) is misleading consumers with inaccurate information by citing unfounded allegations by the New York State Attorney General Office based on an inadequate and unproven analytical method to test herbal supplements.

The New York State Attorney General and the laboratory that conducted the reported analysis relied on DNA barcoding as the only method to attempt to identify ingredients in herbal dietary supplements. They ignored all other well-established and valid methods of herbal analysis that are used by leading experts in botanical identification.

One of the well-known limitations of DNA barcoding is its inability in most cases to identify herbal extracts due to the loss or denaturation of DNA material during processing. Absent additional confirming analysis, using a DNA method that has not been validated for each specific tested product is unscientific and results only in speculation.

All facilities that manufacturer herbal supplements are required by U.S. law to comply with strict current good manufacturing practice (cGMP) requirements that, in part, direct manufacturers to conduct appropriate tests or examination to verify that the dietary supplements they make, including botanical supplements, meet all product specifications. FDA regularly inspects dietary supplement manufacturing facilities to ensure compliance with cGMP requirements and has authority to take action against companies that do not comply.

Sincerely,

Michael McGuffin
President
American Herbal Product Association (AHPA)
mmcguffin@ahpa.org