



Oct. 17, 2018

Letter to the Editor

*JAMA Open Network*

Via email: [Jamanetworkopen@jamanetwork.org](mailto:Jamanetworkopen@jamanetwork.org)

Dear Editor:

The American Herbal Products Association (AHPA) and its members share concerns about health risks presented by unapproved drugs masquerading as dietary supplements, as outlined in your recent article (“[Unapproved Pharmaceutical Ingredients Included in Dietary Supplements Associated With US Food and Drug Administration Warnings](#),” October 12, 2018).

However, the article’s authors mislead readers by failing to make a clear distinction between unlawful, misbranded drugs and legal dietary supplements. This is not the first time that an article in a *JAMA*-affiliated publication has inaccurately identified such products as dietary supplements. AHPA submitted a letter in 2013 that was [published in \*JAMA Internal Medicine\*](#) in response to similar inaccuracies in an article in that journal, and that clarified that the Food and Drug Administration (FDA) accurately identifies these fraudulent products as “[masquerading as dietary supplements](#).” This information should have been readily available to the authors of the Oct. 12 article so they could have provided more accurate information.

Since 2011, AHPA has worked to keep consumers informed about illegal products that contain undeclared drug ingredients through our [Keep Supplements Clean](#) website. The website lists recalls and health advisories posted by FDA, and by international regulatory organizations in other countries including Canada, Australia, and the United Kingdom. The fact that this is an international concern demonstrates that the U.S. legal and regulatory structure for dietary supplements is not to blame for this issue. Put simply, these products are illegal under current U.S. law and those who knowingly manufacture and distribute them are criminals.

This is in stark contrast to the regulated dietary supplement industry which is committed to consumer safety. AHPA and its members fully support strict enforcement of all laws and regulations, including those that prohibit illegal, undeclared drugs from being sold in any product. Entities that falsely market products as dietary supplements often work hard to blur the line between their contraband and legal products.

It is important for consumers to know the difference between these products and I encourage you to help educate your readers to make this distinction in future articles by refraining from identifying these fraudulent products as dietary supplement – this is simply false. Issuance of a correction to the Oct. 12 article would also be appropriate.

Sincerely,



Michael McGuffin  
President  
American Herbal Product Association (AHPA)  
[mmcguffin@ahpa.org](mailto:mmcguffin@ahpa.org)  
(301) 588-1171 x201