



April 2, 2020

Nick Westcott
Director of Advance
Office of the Secretary
United States Department of Agriculture
via email: nick.westcott@usda.gov

Re: Food Supply Chain disruptions

Hello Mr. Westcott,

Thank you again for your inquiry of March 23, 2020 to make sure USDA is aware of any Food Supply Chain issues our organization may be experiencing related to business disruptions associated with COVID-19.

AHPA's membership includes over 300 companies doing business as growers, collectors, processors, manufacturers, marketers, importers, exporters and distributors of herbs and herbal products marketed as foods, dietary supplements, drugs, cosmetics, and other types of consumer goods. Many AHPA members use ingredients and materials produced in the United States and in other countries.

To contribute information to your inquiry we surveyed these member companies and requested responses within two business days. The responses received reported shortages or delivery disruptions of a variety of ingredients, supplies, and services that largely fall into the categories identified below. Note that though several of the specifically identified ingredients may not be readily familiar, these are used in dietary supplement products regulated under the Food, Drug, and Cosmetic Act as a category of food.

▪ **Botanical raw materials**

Botanical materials consisting of unprocessed plants and plant extracts, from Brazil, Bulgaria, Canada, China, France, India, Indonesia, Italy, Mexico and Taiwan. Identified examples include: agave, arnica, bilberry, boswellia, cilantro, echinacea, elderberry, gentian, hawthorn, linden, and lomatium, passionflower, pomegranate, reishi and turmeric. Food ingredients were also identified, including lentils and rice.

▪ **Proprietary ingredients**

Several proprietary botanical extracts from Italy and New Zealand.

▪ **Letter vitamins and other dietary ingredients**

Letter vitamins and other dietary ingredients, from China and India, including CoQ10, ascorbic acid, and calcium D glucarate, as well as "letter vitamins" generally described.

▪ **Supplies for manufacturing**

One respondent reported disruptions to the supply of organic alcohol (ethanol), an essential ingredient used as a solvent in botanical extraction operations. No specific source country was identified but the primary supply for most AHPA members is reportedly domestic.

▪ **Packaging materials**

A variety of packaging materials and supplies from China and Mexico, including glass and plastic bottles, bottle closures, etc. Some respondents also report supply disruptions of these materials even from U.S. suppliers.

▪ **Supplies for sanitation**

Essential supplies for sanitation procedures, including isopropyl alcohol, nitrile gloves, and face masks. Source countries identified include China, and again, even U.S. suppliers of these materials.

▪ **Services**

Respondents also reported issues with availability of contract manufacturer and bottling operations, at least regionally in some parts of the U.S.

Please let me know if additional or more specific information is needed to complete your inquiry. And again, thank you for your interest and outreach in this important matter.

Sincerely,



Michael McGuffin
President
American Herbal Products Association
mmcguffin@ahpa.org