

## Haley Chitty

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**From:** Jamanetworkopen <Jamanetworkopen@jamanetwork.org>  
**Sent:** Thursday, October 18, 2018 10:17 AM  
**To:** Haley Chitty  
**Cc:** Frederic Rivara  
**Subject:** RE: Letter to JAMA Editor re: Unapproved APIs in Dietary Supplements, Drs. Tucker, et al

Dear Dr. Chitty,

Thank you for your interest in JAMA Network Open. Because we are an online-only journal, we are not accepting traditional letters to the editor nor unsolicited commentaries.

We do, however, encourage you to respond to the article by leaving your remarks in the online Comment section (see the "Comments" tab toward the upper-right corner of the article) at <https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2706496>

Best regards,

Editorial Coordinator  
JAMA Network Open

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**From:** Haley Chitty [mailto:HChitty@ahpa.org]  
**Sent:** Wednesday, October 17, 2018 8:27 AM  
**To:** Jamanetworkopen <Jamanetworkopen@jamanetwork.org>  
**Subject:** Letter to JAMA Editor re: Unapproved APIs in Dietary Supplements, Drs. Tucker, et al

Dear editor,

Please see the letter to the editor (below and attached) in response to your recent article ("[Unapproved Pharmaceutical Ingredients Included in Dietary Supplements Associated With US Food and Drug Administration Warnings](#)," October 12, 2018). Please don't hesitate to contact me if you need any additional information. Thank you.

Letter to the Editor of *JAMA Open Network*

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

### Haley Chitty

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- [AHPA Events at SupplySide West \(11/8-10/2018\)](#)
- [7th Annual Botanical Congress \(11/10/2018\)](#)
- [Webinar: FDA cGMP Inspection Trends and Responding to an FDA 483 \(12/4 & 18/2018\)](#)
- [AHPA meetings and events at Natural Products Expo West \(3/5-9/2019\)](#)

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