



November 5, 2013

**Letter to the Editor**

*BMC Medicine*

BioMed Central

Attention: Sabina Alam, Ph.D.

236 Gray's Inn Road

London WC1X 8HB

United Kingdom

Delivered via email to [bmcmedicineeditorial@biomedcentral.com](mailto:bmcmedicineeditorial@biomedcentral.com)

Dear Editor:

I'm writing to point out several inaccuracies in the article, "[DNA barcoding detects contamination and substitution in North American herbal products](#)," published in volume 11 of *BMC Medicine*.

The report inaccurately states that, "There are currently no best practices in place for identifying the species of the various ingredients used in herbal products." It then draws a conclusion from this unsubstantiated statement saying that, "As a result, the marketplace is prone to contamination and possible product substitution ..."

All herbal products marketed in United States must comply with the Food and Drug Administration's (FDA's) current Good Manufacturing Practice (cGMP), which includes a provision that requires manufacturers to verify the identity of all herbal ingredients using scientifically valid methods. The American Herbal Products Association (AHPA) strongly supports this requirement and encourages FDA to strictly enforce the rule.

The article also presents its findings as if DNA barcoding has been validated for the identification of each of the tested botanicals. But this is an emerging technology and there are still many questions about the effectiveness and limitations of this method. DNA testing has the potential to be useful in the future when it has been rigorously tested, but the article's blanket assertions about the accuracy of this novel analytical tool are premature.

In addition, omitting the names of the products tested is a disservice to companies that verify the identity of the ingredients in their products using scientifically valid methods like chromatography, microscopy and organoleptic analysis by qualified experts. These companies' reputations should not be tarnished and AHPA urges the authors of the paper to disclose the identity of the tested products.

Sincerely,

Michael McGuffin

President

American Herbal Product Association (AHPA)