

**BEFORE**

**THE UNITED STATES OF AMERICA**

**DEPARTMENT OF HEALTH AND HUMAN SERVICES**

**NATIONAL INSTITUTES OF HEALTH**

**COMMENTS OF THE**

**AMERICAN HERBAL PRODUCTS ASSOCIATION**

**ON THE**

**NATIONAL INSTITUTES OF HEALTH OFFICE OF DIETARY SUPPLEMENTS**  
**DRAFT STRATEGIC PLAN 2022-2026**

**August 31, 2022**

## **Prefatory remarks**

The American Herbal Products Association (AHPA) is the national trade association and voice of the herbal products industry. AHPA members include domestic and foreign companies doing business as growers, importers, processors, manufacturers, and marketers of herbs and herbal products. AHPA serves its members by promoting the responsible commerce of products that contain herbs, including conventional human foods, dietary supplements, health and beauty products, animal products, and other products.

In 1998, the U.S. National Institutes of Health Office of Dietary Supplements (ODS) established the practice of developing five-year strategic plans. ODS has continued to use the goals-oriented five-year framework established in 1998 during subsequent strategic planning activities over the following 24 years.

On October 25, 2021, AHPA received an advance draft of the 2022-2026 strategic plan from ODS to serve as an external expert reviewer. AHPA provided feedback on this version of the plan on November 18. On July 28, 2022, ODS issued a request for information in the Federal Register announcing the public availability of the draft 2022-2026 strategic plan and requesting public feedback on its contents.

## **Greater external stakeholder engagement will improve outcomes**

AHPA identifies several points in the draft strategic plan at which proposed ODS and broader NIH activities would be enhanced by the inclusion of greater external stakeholder input.

Strategy 1-3 states in part that “ODS will continue to conduct internal and NIH-wide portfolio analyses with NIH ICOs [Institutes, Centers, and Offices] and other federal partners, leading to priority setting for funding decisions and identification of emerging research opportunities.” Opportunities and knowledge gaps may exist that are not visible from a purely governmental perspective. AHPA therefore encourages the inclusion of external stakeholders from industry and academia in these portfolio analyses.

Strategy 3-2 describes ODS’s ongoing commitment to the development of new analytical methods and reference materials for dietary supplement evaluation, including through interagency collaboration activities. AHPA encourages the inclusion

of industry stakeholders with experience in application of analytical methods and reference materials in the identification and prioritization of projects on this subject.

Strategy 4-1 states that ODS will publish new dietary supplement fact sheets and revise existing fact sheets as necessary to keep them current. AHPA lauds the efforts of ODS to encourage the dissemination of information on supplements of interest. However, the fact sheet preparation and revisions process does not provide an opportunity for a review and comment period by affected stakeholders (consumers, academia, supplement industry, trade associations, etc.). The inclusion of an open comment and review period could help reduce the possibility of potential data gaps and could improve the overall impact and relevance of the fact sheets to stakeholders.

Strategy 5-2 and a separate “new initiatives” section later in the draft plan discuss the proposed creation of the NIH Dietary Supplement Research Coordinating Committee (NIH DSRCC), to “identify emerging and cross-cutting research areas and to develop platforms for encouraging collaborative initiatives across NIH and within the federal government”. AHPA notes that the stated purpose of the DSRCC envisions “collaborative initiatives” that include government actors beyond the NIH, but further notes that the DSRCC as proposed consists exclusively of participants from within NIH. AHPA encourages the direct involvement of government stakeholders from outside of NIH in the DSRCC, as well as representatives of academia and the dietary supplement industry.

### **Enhance dissemination activity through trade organization outreach**

Goal 3 of the strategic plan includes the dissemination of research resources and tools to enhance the quality of dietary supplement research. AHPA agrees that such communication activity should be part of the standard dissemination strategy for the Office. Furthermore, AHPA encourages the direct communication of new or updated ODS tools, educational activities, and research outcomes to industry associations as a part of all strategies addressing Goal 3. Trade associations can serve to expand the reach of ODS communications in these areas, drawing new academic, industry and consumer audiences to ODS activities. This was demonstrated by recent AHPA outreach promoting major updates to the Dietary Supplement Label Database<sup>1</sup>.

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<sup>1</sup> AHPA Update 2/1/2022, “Dietary Supplement Label Database adds thousands of labels”.

## **Broader collaboration is needed to address research gaps**

Goal 5 of the strategic plan is to “Coordinate and support the development of collaborative initiatives to address gaps in dietary supplement research.” AHPA notes that while the stated purpose of this goal is to address gaps in existing research, the strategic plan does not clearly identify how new coordination activity by ODS will identify or address research gaps. The strategies addressing Goal 5 refer exclusively to activities among NIH ICOs, and the Goal 5 description itself refers to collaboration with only the FDA, U.S. Public Health Service, and USDA.

AHPA suggests the inclusion of a broader set of governmental entities in the set of “sister agencies” with which ODS collaborates under Goal 5 strategies, especially in the identification of research and resource gaps. For example, EPA uses NHANES data in intersection with other sources (including recipe and intake databases) in the determination of commodity dose exposures for the purpose of establishing pesticide tolerances. This activity has a direct impact on public health and numerous areas of research, and utilizes a set of database frameworks which could benefit from the collaboration and gap analysis framework described in Goal 5.

## **Conclusion**

AHPA greatly appreciates the opportunity to present comments on the draft strategic plan. AHPA staff and counsel will make themselves available at any mutually convenient time to further address any of the topics addressed herein. If ODS requires clarification or additional discussion on any of the items raised in these comments, please feel free to contact us.

Respectfully submitted,



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A handwritten signature in black ink, appearing to read "Robert Marriott". The signature is stylized and somewhat cursive.

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