ORGANIC TRADE ASSOCIATION

Dietary Supplements Council

2019 ANNUAL REPORT



Founded in 2015, the aim of the Dietary Supplement
Council is to provide a forum for discussing issues,
challenges and opportunities related to the organic dietary
supplement industry, and to develop and grow the sector
in general by raising awareness and increasing access to
educational materials and resources.

The Dietary Supplement Council is in the process of completing the items on our 2019 Work Plan, and is looking forward to several exciting projects for 2020. Milestones for 2019 included successful engagement in the National Organic Standards Board (NOSB) petition process for pullulan and planning for a future webinar.

DIETARY SUPPLEMENT COUNCIL ACTIVITY IN 2018-2019

Membership Development

The Council continued to target potential new members, both within Organic Trade Association membership and industry partners during the year.

Council Leadership Elections

In the Fall 2018, the Council held its third elections for Council leadership, with a changeover in all three leaders. With unanimous votes, Jeffrey Brams was elected as the Council's Chair, Steve Peirce moved to the Vice Chair, and Jessica Walden was confirmed as the Secretary. The members of the Council and OTA staff look forward to two years of collaboration and elevating the work with our leaders. Many thanks should be extended to our previous leaders in their roles, Bethany Davis of MegaFood, and Graham Rigby of Organic India!



Chair, Jeffrey Brams Garden of Life, LLC



Vice Chair, Steve Peirce Ribus, Inc.



Secretary, Jessica Walden

Quality Assurance International (QAI)

NOSB Engagement: Pullulan Petition

To protect the continued production and availability of USDA-NOP certified encapsulated dietary supplements, the Organic Trade Association, with the technical support of the council, filed a petition in January 2018 to add pullulan to the USDA's National List of Allowed and Prohibited Substances. Pullulan is an essential ingredient used to make NOP certified (non-GMO) encapsulated vegetarian supplements. Currently, a commercial supply of organic pullulan is unavailable and

Council Members





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no other NOP compliant vegetarian options are available. Certifiers previously classified pullulan as agricultural (derived from plants) and would allow its use only in the designated 30% non-organic portion of products certified to the "made with organic ingredients" labeling category (70%+ organic). However, in response to new regulatory guidance from USDA-NOP, certifiers reclassified pullulan as "nonagricultural" since it is actually a polysaccharide made from a yeast-like fungus. The new interpretation and change in classification required pullulan to be brought under strict review of NOSB and the National List 5-year review (sunset) process.

Following the completion of the NOSB technical review, and with the support of Council members' engagement during the Spring 2019 meeting, the petition to allow pullulan in processing and handling as "made with" only was accepted. Because councils are not policy-setting groups, an OTA task force formed to engage this topic and to advise on OTA's comments. Council members engaged in the public comment period via the task force when it opened in response to the NOSB proposal.

Public commenters widely supported the Organic Trade Association's petition for the addition of pullulan to the National List as a non-agricultural substance used in dietary supplements labeled as "made with organic (specific ingredients of food group(s))." In fact, the only controversial aspect of the petition was the correct pronunciation of pullulan. NOSB agreed with the merits of the petition, concluding that the use of pullulan meets the criteria of the organic law and regulations. In its agreement, the board unanimously voted on the motion to pass the petition (14-0).

Organic Week 2019

During the Organic Trade Association's Member Day on May 20, 2019, members of the Dietary Supplements Council joined Fiber Council and Retail Sector Council members in a discussion and presentation on best labeling practices of non-food products in the retail sector. OTA's Vice President for Regulatory and Technical Affairs, Gwendolyn Wyard, gave the presentation to over 40 members in attendance, with Angela Jagiello, Director of Education and Insights, also in attendance. The council anticipates collaboration on the development of best labeling practices for supplements during 2020.

In an effort to support member outreach and recruitment, as well as further the aims of the council, OTA and American Herbal Products Association (AHPA) are in discussion to join forces through a formal partnership to strengthen and grow the North American organic supplement sector.

The council is also working on developing an Organic 101 pamphlet specifically targeted and tailored to the interested and direct needs of the dietary supplement customers.

Organic Trade Association Sector Councils

OTA's Councils provide ongoing opportunities for networking, leadership development, and education. They communicate sector issues, ideas, and concerns to OTA staff and Board.

Submit a Sector Council application online at OTA.com after you've met these basic requirements:

- Identify at least 7 OTA members committed to participating in our Council.
- Identify at least 1 member who will act as the primary contact until officers are elected.
- Review the Council Operating Guidelines and agree to operate within the outlined requirements if the request for establishment is approved.

If your organization is interested in learning more about their work or joining the Dietary Supplements Council, please contact Gwendolyn Wyard (gwyard@ota.com).



LOOKING AHEAD TO 2020

Working alongside the Organic Trade Association staff, the Council continues updating and reorganizing its Dietary Supplement's webpage as well as creating a page on policy and advocacy work with the sector. They plan to include additional resource links, guidance documents and fact sheets to support consumer education and educational events. The council is also planning to host an educational webinar for retailers titled "Talking Organic Supplements in the Aisle" early in 2020. An panel of experts will discuss the ins and outs of organic supplement certification, the benefits of organic supplements and provide information that will help retailers feel more confident discussing organic dietary supplements in store aisles with their shoppers.



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Locations

Washington, D.C. | Brattleboro, VT Santa Cruz, CA | Corvallis, OR

Jeffrey Brams of Garden of Life is chair of the Organic Trade Association's Dietary Supplements Council. Steve Peirce of Ribus is the Vice Chair, and Jessica Walden of Quality Assurance International (QAI) is the Secretary. The Organic Trade Association's Vice President of Regulatory and Technical Affairs, Gwendolyn Wyard, provides support to the Council.