acofp AMERICAN COLLEGE OF OSTEOPATHIC FAMILY PHYSICIANS

RES 17
C-3/22

SUBJECT: Higher Regulatory Standards for the Dietary Supplement Industry

SUBMITTED BY: Student Association of the ACOFP on behalf of Brett Platis, OMS IV, Texas College of Osteopathic Medicine

REFERRED TO: 2022 American College of Osteopathic Family Physicians (ACOFP) Congress of Delegates

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RESOLUTION NO. 17

WHEREAS, dietary supplements are defined as "products taken by mouth that contain a dietary ingredient" and include "vitamins, minerals, amino acids, and herbs or botanicals, as well as other substances that can be used to supplement the diet"[1]; and

WHEREAS, the dietary supplement industry is rapidly growing, with around 150 million persons in the US reportedly using dietary supplements, over 75% of users claiming supplement use on a daily basis, 10% claiming to take more than 5 supplements per day[2], and many users taking supplements instead of prescription drugs or over-the-counter medications; and

WHEREAS, the dietary supplement industry has successfully lobbied for less regulation, resulting in dietary supplement manufacturers being subject to less stringent guidelines regarding product manufacturing, safety, and labeling[3,4]; and

WHEREAS, manufacturing and distribution rules for dietary supplements are less strict than those for FDA approved drugs, with the FDA not being authorized to review dietary supplements for safety or effectiveness before they are marketed[5]; and

WHEREAS, purchased dietary supplements often differ dramatically from those tested or researched due to poor production oversight and quality control requirements[6,7]; and

WHEREAS, dietary supplements may be dangerous in excess, interact with other medications, or pose significant risks in patients with certain medical problems[8,9]; and

WHEREAS, labeling for dietary supplements is often incorrect, with many products illegally containing prescription drugs or other ingredients not listed on the label which may be unsafe[3,10]; and

WHEREAS, most dietary supplements haven't been tested in pregnant women, nursing mothers, or children[11]; and

WHEREAS, there are no requirements for manufacturers of dietary supplements to show clinical efficacy before production and distribution, and federal law does not require claims about said effectiveness be accurate or truthful before appearing on the product[12]; and

WHEREAS, there is insufficient evidence to support the use of most dietary supplements on the market, with extensive researching failing to demonstrate the efficacy of numerous supplements in disease prevention[13,14]; now, therefore be it

RESOLVED, that the American College of Osteopathic Family Physicians (ACOFP) encourage the US government and FDA to require companies to clearly communicate the clinical efficacy of dietary supplements; and, be it further

RESOLVED, that the ACOFP encourage the US government and FDA to enforce more stringent regulation regarding the production, labeling, and use of dietary supplements; and, be it further

RESOLVED, that the ACOFP support legislation to improve transparency in advertising to patients regarding supplement safety and efficacy; and, be it further

RESOLVED, that the ACOFP promote education about the health risks regarding excess dietary supplement use or substitution for prescription medication; and, be it further

RESOLVED, that the ACOFP discourage healthcare providers from using dietary supplements as a means of curing or mitigating medical disease unless clinical efficacy is proven; and, be it further

RESOLVED, that the ACOFP encourage healthcare providers to educate their patients regarding marketing practices of the dietary supplement industry.

FINAL ACTION: DISAPPROVED as of March 16, 2022

Explanatory Statement from Committee: Dietary supplements do not fall under drugs as they are under foods; therefore, to make any changes to labeling and efficacy would require a policy change through the legislation to move supplements under drugs and medication. This resolution addresses multiple intentions. Due to the multiple nonspecific resolves pertaining "Higher Regulatory Standards," we recommend the author rework this resolution to address in multiple resolutions. Furthermore, there is concern regarding potential prescribing restrictions and legal implications for off-label treatments or other modalities with limited evidence, such as some facets of osteopathic manipulative treatment (OMT).

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