Founded in 2015, the Organic Trade Association (OTA) Dietary Supplements Council seeks 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 its 2018 Work Plan and is looking forward to several exciting projects for 2019. Milestones for 2018 included increasing its membership, engagement in the National Organic Standards Board (NOSB) process and completing a guidance document on Formulation and Marketing of National Organic Program (NOP) certified dietary supplements.

**Dietary Supplement Council Activity 2017-2018**

**Membership Development**

The Council continued to increase its membership reach in 2017-2018, adding one new member to the roster for 19 groups. The group has targeted potential new members, both within the Organic Trade Association membership and industry partners. If you’re interested in learning more information or joining the Dietary Supplements Council, please contact Gwendolyn Wyard (gwyard@ota.com).

**NOSB Engagement: Pullulan Petition**

To protect the continued production and availability of USDA certified organic encapsulated dietary supplements, the Organic Trade Association, with the technical support of the Council, filed a petition to add Pullulan to 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 pul Pullulan lulan is unavailable and 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’s 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 requires Pullulan to be brought under strict review of NOSB and the National List five-year review (sunset) process. Pullulan is now under NOSB technical review. NOSB will discuss the petition at the Fall 2018 meeting and gather feedback to help inform a proposal that will be voted on at the Spring 2019 NOSB meeting. Council members are engaging in the public comment process via an Organic Trade Association task force that was convened to inform OTA’s comments.
Guidance on Formulation and Marketing of NOP certified Dietary Supplements

The Council completed a major project and released an updated document entitled “Guidance on Formulation and Marketing of Dietary Supplements under the National Organic Program.” The American Herbal Products Association (AHPA) and Quality Assurance International (QAI) originally developed the guidance document in 2013. The updated release provides guidance to companies that wish to market organically produced dietary supplements in the United States. It includes information about the types of supplements that are eligible for organic certification under the National Organic Program and the various NOP labeling categories available for several types of supplement products. It also provides an overview of regulatory obligations that must be met from the farm to packaged products. The Supplements Council has collaborated with AHPA and QAI to update the guidance with current information. It is now available on all three partners’ websites.

Natural Products Expo West
Dietary Supplement Council In-Person Meeting

During the Council’s in-person meeting at Natural Products Expo West on March 9, members discussed hosting a webinar for retailers based on their 2017 Expo East presentation. They also discussed the development of a “Vitamins and Minerals 101 Pamphlet” and participation in an Organic Trade Association Pullulan Task Force to shape OTA’s position and comments to NOSB on the addition of Pullulan to the National List.

Natural Products Expo East
Dietary Supplement Council In-Person Meeting

The Council will convene its fourth in-person meeting since its inception on Thursday, September 13. The meeting will focus on officer elections, the development of its 2019 Work Plan and NOSB’s response to the Pullulan petition (if available) for comment prior to the Fall 2018 NOSB meeting.

Looking Ahead

Working alongside the Organic Trade Association staff, the Council is in the early stages of updating and reorganizing its Dietary Supplements webpage. It plans 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 online educational webinar for retailers titled “Talking Organic Supplements in the Aisle.” A panel of experts will discuss the ins and outs of organic supplement certification, the benefits of organic supplements, and information that will help retailers feel more confident discussing organic dietary supplements in store aisles with their shoppers.

The Council is preparing for the comment period on the Pullulan petition at the Fall 2018 NOSB meeting in Minneapolis, MN in October, with a vote occurring during the Spring 2019 meeting.

To support member outreach and recruitment as well as further the aim of the Council, the Organic Trade Association and the 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.

Organic Trade Association Sector Councils

Our Councils provide ongoing opportunities for networking, leadership development, and education. They communicate sector issues, ideas, and concerns to the Organic Trade Association staff and Board. Submit a Sector Council application online at OTA.com after you’ve met these basic requirements:

- Identify at least seven the Organic Trade Association members committed to participating in the Council
- Identify at least one member who will act as the primary contact until officers are elected
- Review the Council Operating Guidelines and agree to operate within the requirements required by the Organic Trade Association for councils it approves.
Bethany Davis of MegaFood is chair of the Organic Trade Association Dietary Supplements Council. Graham Rigby of Organic India serves as Vice Chair, and Steve Pierce of Ribus is the Secretary. The Organic Trade Association’s Vice President of Regulatory and Technical Affairs, Gwendolyn Wyard, provides support to the Council.