



*Advancing Quality Healthcare  
Through Over-the-Counter Medicines  
and Nutritional Supplements*

## **CONSUMER HEALTHCARE PRODUCTS ASSOCIATION**

September 10, 2003

Dr. Elizabeth Yetley  
FDA Lead Scientist for Nutrition  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway (HFS-006)  
College Park, MD 20740-3835

Re: Codex Committee on Nutrition and Foods for Special Dietary Uses, Docket No. 03-024N

Dear Dr. Yetley:

The Consumer Healthcare Products Association is the 122-year-old trade association representing manufacturers of dietary supplements and OTC medicines in the U.S. As our members would be impacted by any Codex guidelines for vitamin and mineral supplements, we welcome the opportunity to comment on the U.S. government's position concerning draft vitamin and mineral supplement guidelines before the Codex Committee on Nutrition and Foods for Special Dietary Uses.

We are supportive of the past U.S. government position concerning the proposed draft before the CCNFSDU. Past positions have appropriately noted the importance of consumer choice and access to safe vitamin and mineral supplements that are labeled in a truthful and non-misleading manner. Past positions have appropriately stressed that any maximum levels of vitamins and minerals in supplements should be based on safety assessments and not arbitrary application of a percentage of recommended daily intake. We again urge the U.S. government to maintain that position. Similarly, we would again urge the U.S. government to oppose any efforts that would recommend supplement labeling inconsistent with the themes of choice and access prevalent in the draft guideline preamble and purpose, i.e., to oppose label cautions to consult with a health professional before taking a supplement.

We appreciate the opportunity to submit these comments in preparation for the USDA and FDA public meeting on September 16.

Sincerely,

*DCS*

David C. Spangler  
Vice President – International  
& Assistant General Counsel

cc: Nancy Crane, CFSAN, FDA

DB/mm