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**Crane, Nancy T****From:** Larsen, Craig [CLarsen@Amerifit.com]**Sent:** Monday, August 26, 2002 8:42 AM**To:** Crane, Nancy T**Subject:** Codex and Dietary Supplements

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Craig R. Larsen

The CODEX proposed draft guidelines for vitamins and mineral supplements contains a U.S. proposed draft position on labeling which states:

"We recommend the following revision: **All labels should bear a statement that a supplement should be taken on advice of a nutritionist, a dietitian, or a medical doctor.**"  
(Item 5.9)

As a lawyer, nutritionist and industry executive, such a restriction on labeling is against the law (DSHEA), against freedom of choice to determine one's own health care regimen and completely singles out one class of trade that, for the most part, offers health benefits.

I don't think anyone would consider drafting a law that says for high fat foods, "This food can cause obesity, high cholesterol and heart disease. Only eat under the advice of a medical doctor."

Supplements to the diet are just that. Supplements. Quite honestly, asking a medical doctor to recommend a supplement is so absurd it is without definition. Approximately 90 percent of all medical doctor's don't know the first thing about nutrition, let alone dietary supplements – by their own admission. We have paneled 100's of doctors of the years and they all admit they have very little training or knowledge of supplements.

If you want to require that a supplement should be taken only on the advice of a nutritionist, dietitian or medical doctor – raise the bar on their educational requirements so they can actually provide reasonable, intelligent guidance. Quite honestly, most of them would be guilty of malpractice – whether advising for or against supplements. They simply don't have the requisite knowledge.

As a last sarcastic note, but meant with some sincerity – ask a doctor about 10 of the drugs her prescribes and ask how much he knows about them. Then ask a responsible person in the nutrition industry about their knowledge of their own products and the research behind them and I think you will be surprised at the results. I have made that challenge to physician's for years.

I have yet to lose.

Craig R. Larsen  
Director of Product Integrity

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