

## **Natural Products Association Responses White House Conference on Hunger and Nutrition**

Founded in 1936, the Natural Products Association (NPA) is the oldest and largest trade association representing the natural products industry. It comprises over 700 diverse member organizations united in providing consumers with access to safe products to maintain and improve their health. While a healthy diet is a foundation for better health, even the most well-informed and well-intentioned consumers don't always eat as they should. Supplements are easy to add to our daily diets. This is often the first step many take toward greater nutritional awareness and healthy lifestyle choices. Whether taking a multivitamin, herbal product, or specialty supplement, people can live healthier lives by supplementing their diets.

For several years, NPA has provided recommendations to Congress for much-needed program reforms and advancement. Dietary supplements, which include vitamins and minerals as nutritional ingredients, are regulated as a food category in the United States by the Food and Drug Administration. They are classified as foods, not drugs because the ingredients they contain are typically found in conventional foods and have a considerable history of safe use. Multivitamin and mineral supplements are usually found in various matrices, including tablets, capsules, caplets, liquid suspensions, etc.

The science of supplements has progressed considerably over the past two decades, and the FDA has allowed health claims to be made on many micronutrients as part of its Significant Scientific Agreement (SSA), which likes to see efficacy from proper endpoints from at least two well-controlled randomized clinical trials (RCTs). This is similar to the Federal Trade Commission's (FTC's) substantiation standard for drugs known as the two RCT Rule. Hundreds of studies are added to our understanding of their clinical efficacy each year.

We thank the Biden Administration for the opportunity to participate in the White House Conference on Hunger and Nutrition.

Diet-related diseases are complex, multifactorial health issues that require a comprehensive approach. Unfortunately, obesity is the second leading preventable cause of death in the United States and is associated with many comorbid conditions. If the recent global pandemic has taught us anything, a nutrient-rich diet is essential to maintain our health, particularly vulnerable populations. Eating various nutritious foods is the best way to get all the required daily nutrients; however, some demographics, including older people, need more significant amounts of specific vitamins and minerals. Deficiencies commonly found include calcium, iron, and vitamin D. Research has shown that bone density often decreases dramatically for those over 50 and that older people are at greater risk for osteopenia or osteoporosis. Studies have shown that those over 50 who consume less than 1,2000 mg of calcium daily are at the highest risk. Additionally, in the United States, more than 1.5 million fractures are reported yearly from individuals over 60.

Vitamin and mineral deficiency should not be as prevalent in a country as developed as the United States, especially in vulnerable populations, as reported. We need to provide Americans with more choices when it comes to their health care. The CDC's 'Second National Report on Biochemical Indicators of Diet and Nutrition in the U.S. Population reported that approximately 10% of Americans had a nutritional deficiency. Still, that number could be as high as one-third for specific demographics. One way to achieve the second, third, and fifth pillars would be to modernize the treatment of nutritional supplements. This year, House representatives Brenden Boyle and Darin LaHood introduced H.R. 5747, *The Dietary Supplement Tax Fairness Act*; this legislation would grant vitamins and minerals to be considered

'medical expenses.' This designation will allow those who choose to use their pre-tax personal health savings account (HSA), flexible spending account (FSA), or health reimbursement (HRA) dollars toward supplementing their health. These pre-tax savings accounts empower more than 44 million Americans to make affordable health care choices that best fit their needs.

We need to provide Americans with more choices when it comes to their healthcare. Proper nutrition is a cornerstone of a health-first strategy. But unfortunately, most Americans, particularly lower-income and older Americans, aren't getting it: Currently, seventeen states and the District of Columbia exempt dietary supplement purchases from state sales taxes. However, consumers who live in a not exempt state are paying the total state sales tax, which adds a noticeable cost to those who can least afford it. Eliminating the sales tax for nutritional supplements helps families put nutritious products in their cabinets. If states are looking to advance economic equity for families and people with low incomes, they need to consider reducing or eliminating sales taxes on nutritional supplements. These changes could make state tax codes more equitable and help families better afford nutritious products.

Everyone deserves a chance at a healthy life, but sadly, malnutrition stands in the way for millions. One public-private partnership that is seeking to reduce malnutrition is Vitamin Angels. When the nutrition interventions that support a child's healthy start are out of reach, it can perpetuate a cycle of poverty, poor health, and adverse well-being across generations. The Vitamin Angels team collaborates with thousands of local organizations focusing on reaching underserved communities by providing them with evidence-based nutrition interventions in various health services. For instance, Vitamin Angels will provide prenatal vitamins and minerals to pregnant women that can safely and effectively improve maternal health and birth outcomes. Additionally, Vitamin Angels provide bi-annual doses of Vitamin A and Albendazole to young children. Vitamin A in early childhood protects vision and immune health and supports physical Development. Adding Albendazole, an anti-parasitic ensures optimal absorption of nutrients.

The biotechnology and nutraceutical industry harnesses science to create new products that provide opportunities to grow the United States economy and workforce and improve health and nutrition outcomes. To achieve the goals the White House Conference on Food, Nutrition, and Health outlined, the United States needs to invest in foundational biotechnology capabilities to safeguard essential health care products from foreign and strategic adversaries who threaten our competitiveness and security.

The human population is expected to grow to nine billion by 2030. This demands a significant increase in capabilities to supply nutrition and health-promoting ingredients. It is estimated that people living in rural areas depend on their production for more than 60 percent of their food supply. However, people living in urban areas rely on the market for nearly 90 percent of their food supply. So, every time one person moves from a rural to an urban setting, needed market supplies must increase by two.

Where will this food come from? An estimated 200,000 m<sup>2</sup> are lost every minute to drought and harmful farming practices. As a result, daily consumption of botanicals, fruits, and vegetables is becoming more expensive and impractical. Consumer demand has been driving food and beverage companies to incorporate health-promoting ingredients. This has resulted in a current botanical-derived nutraceuticals market to be \$12 billion in the United States and \$50 billion globally. However, cost-effective and sustainable solutions to supply these ingredients for product inclusion do not exist. This challenge allows us to create a set of technologies, incentives, and policies that pay attention to the long-term stewardship of these vital resources. Managing these resources is intimately tied to improving productivity and profitability.

The White House Conference on Food, Nutrition, and Health has outlined integrating nutrition and health and enhancing nutrition and food security as part of the five pillars that will help eliminate disparities and support the diverse communities impacted by hunger and diet-related diseases.

According to a 2018, Nutra-Ingredients [article](#), 95% of the world's vitamin C is produced in China. Additionally, the United States is the biggest importer of China's nutraceutical ingredients accounting for 20% of Chinese exports. As many as three of every four nutritional elements are sourced from China. Supporting policies and initiatives that advance sustainable botanical-derived nutraceuticals achieves the pillars outlined by the Conference and helps us overcome challenges in the current ingredient supply chain. Some of the most essential and potent health bioactives come from plants and can only be produced through agriculture or forage. Climate volatility and limited natural resources lead to shortcuts on purity, safety, and sustainability and industry needs new forms of production to tap into sustainable plant bioactives at scale. To strengthen our biotechnology and nutraceutical supply chain, the Biden Administration must direct Congress to pass legislation reshoring nutraceutical manufacturing in conjunction with their continued support of the biotechnology industry.

Revolutionizing plant cell technology will create a more sustainable industry focused on healthy products without land, irrigation, fertilizers, or pesticides required by agriculture. It also solves the standardization problems plaguing agriculture-based supply chains and provides climate change resilience while protecting natural ecosystems and biodiversity. To accomplish the five pillars outlined by the Conference, there are several opportunities for the federal government to support healthier lifestyles legislatively and regulatorily. For instance, several pieces of legislation would bring health care products, such as Active Pharmaceutical Ingredients (APIs), manufacturing back to the United States. The Biden Administration should support these proposals and work with Congress to ensure we rely less on foreign entities for our products. As part of the recently passed CHIPS and Science Act, Congress provided more than \$52 billion for manufacturing, scientific research, and workforce development. This bipartisan policy expands research into domestic biomanufacturing and will speed up the commercialization of new biotechnology products and train a diversified workforce of life science professionals. President Biden also signed an Executive Order to launch a National Biotechnology and Biomanufacturing Initiative that will ensure what is invented in the United States is made in the United States. The CHIPS and Science Act and this Executive Order greatly interest NPA and biotechnology companies. Growing domestic biomanufacturing capacity is foundational to our security and national infrastructure for biomanufacturing but also strengthens the U.S. supply chain. Just as modern software engineers draw on existing libraries of code to write new programs, our biotechnology engineers start from our codebase of cells, enzymes, and genetic programs to jumpstart new projects, driving new discoveries across different industries. We hope that the Administration and Congress continue to invest in and support the biotechnology industry through the various mechanisms at their disposal.

Finally, supporting the biotechnology and nutraceutical industries will solve consumers' access and cost problems by including these high-tech nutrients in mass-market food products. Millions of Americans are afflicted with food insecurity and diet-related diseases, including heart disease, obesity, and type 2 diabetes – which are some of the leading causes of death and disability in the United States. The toll of hunger and these diseases is not distributed equally, disproportionately impacting underserved communities, including but not limited to communities of color and people living in rural areas. The lack of access to healthy, safe, and affordable health products contributes to hunger- diet-related diseases, and health disparities, and the COVID-19 pandemic has exacerbated these challenges further, and as the federal government continues to support these industries, technological advances will help drive down the cost of mass-market food products.



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It's been more than 50 years since the first and only White House Conference on Food, Nutrition, and Health was held in 1969. That pivotal event helped galvanize actions that included creating life-changing programs like school lunches, the Supplemental Feeding Program for Women Infants and Children (WIC), and changes to how we label foods. The 2022 White House Conference brings together the public and private sectors around a coordinated strategy to accelerate progress and drive transformative change in the United States to end hunger, improve nutrition and physical activity, and close disparities surrounding them. The science shows that supplementation with essential nutrients can help improve outcomes. We look forward to our continued work towards a healthier United States of America.