

Episode: *Author Interview: “Which Features of Dietary Supplement Industry Product Trends and Regulation Deserve Physicians’ Attention?”*

Guest: Alex Ding, MD, MS

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Transcript by: Cheryl Green

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[bright theme music]

TIM HOFF: Welcome to another episode of the Author Interview series from the *American Medical Association Journal of Ethics*. I’m your host, Tim Hoff. This series provides an alternative format for accessing the interesting and important work being done by Journal contributors each month. Joining me on this episode is Dr Alex Ding, Chair of the AMA Council on Science & Public Health. He’s here to discuss his article coauthored with Dr Amy Cadwallader and other members of the AMA Council on Science & Public Health, *Which Features of Dietary Supplement Industry Product Trends and Regulation Deserve Physicians’ Attention?*, in the May 2022 issue of the Journal, [Underregulated Supplements](#). Dr Ding, thank you so much for being on the podcast today. [theme music fades]

DR ALEX DING: Thanks very much, Tim. It’s great to be here and thanks again for having me.

HOFF: To begin with, what’s the main ethics point of your article?

DING: The key ethics point in the article is that patients and physicians have expectations and assumptions about the dietary supplements that can be purchased in the marketplace. They often wrongly assume that the same rigorous FDA approval process that exists for pharmaceuticals is the same as that of dietary supplements. Unfortunately, the regulatory oversight and process is largely self-regulated, and there are manufacturers, distributors, and sellers of dietary supplements that are acting unethically due to this lack of strong regulatory oversight.

So, just as an example, drugs are considered unsafe until evidence is produced to show that they’re safe and effective before allowing them on the market. Whereas dietary supplements don’t undergo this process. They’re allowed on the market and assumed to be safe until proven otherwise. And in fact, our report notes that an audit that was done in 2017 showed that more than half of dietary supplement facilities that were inspected were found to be in violation of at least one good manufacturing process, most commonly failing to establish the purity, strength, or composition of the product. And while many companies do make every effort to produce quality products, we also reviewed many reports of low quality, intentionally adulterated, or misbranded products labeled as dietary supplements that can pose threats to patient health and safety and are associated with medical harm.

And so, the AMA’s Council on Science & Public Health undertook this research to better understand the quality and safety issues that are associated with the dietary supplements industry and produced a report and then also this manuscript out of what we believe to be an ethical obligation to inform the physician and provider community and really the general public about some of the risks associated with dietary supplement use.

HOFF: And what do you see as the most important thing for health professions students and trainees to take from your article?

DING: I think other than understanding the relatively common presence of and risk associated with un reputable and adulterated products on the shelf, we think it's important for both practitioners and trainees to understand how to have risk-based discussions about dietary supplements with their patients. So, discussing the variability in quality of dietary supplements and talking with your patients about the importance of disclosing the use of dietary supplements when doing medication reconciliation, for example, can help to mitigate risk of drug-to-supplement interactions or drug-to-laboratory test interactions.

And so, I think the other point is that it's important to discuss that dietary supplements are not intended to be a replacement for a healthful and balanced diet, and that there's also risks associated with taking too much of some supplements, such as some of the oil soluble vitamins.

The other thing our article does is it provides some practical references that health professionals and trainees can look at that are available for both patients and practitioners to look for more specific information on specific products. There's also a reference that we provide on where to report violations or adverse events.

HOFF: Mm. And finally, if you could add a point to your article, what would that be?

DING: Yeah, I think one thing our article does point out is that the dietary supplement market is a growing one and that more than half of U.S. adults take dietary supplements. I think given the concerns we've mentioned, it is an area that deserves greater scrutiny from regulators. And we believe that enhancing FDA resources and urging legislators to modernize the law is the right approach.

Unfortunately, the one additional point that I want to make is something that was not really a consideration when we first put together this report in 2020. One thing that we've seen during the pandemic is a significant rise in fraudulently marketed supplement products which are advertised as products to prevent, mitigate, or treat COVID-19. And the FDA and the FTC have specifically identified multiple products that have made false and illegal claims. Therefore, I think greater vigilance on the loosely regulated market should really take on a new level of concern, and both providers and consumers should really be given the tools and the truth in advertising to be able to separate mistruth and disinformation and marketing hype from real, true, empirical evidence of both the quality and the efficacy of these dietary supplements. [theme music returns]

HOFF: Dr Ding, thank you so much for being on the podcast with me today and for you and your colleagues' work for the Journal this month.

DING: My pleasure and thank you for featuring us.

HOFF: To read the full article as well as the rest of the May 2022 issue for free, visit our site, [JournalofEthics.org](https://www.journalofethics.org). We'll be back soon with more *Ethics Talk* from the *American Medical Association Journal of Ethics*.