TO: Joint Committee on Dietary Supplements
FROM: Brian Zamora, Chair of the Joint Committee
DATE: November 13, 2020

SUBJECT: Proposed revision to NSF/ANSI 173 – Dietary Supplements (173i94r1)

Revision 1 of NSF/ANSI 173 issue 94 is being forwarded to the Joint Committee for consideration. Please review the proposal and submit your ballot by December 4, 2020 via the NSF Online Workspace <www.standards.nsf.org>.

When adding comments, please use the comment template provided in the ballot and upload it online via the browse function.

Purpose

Create more consistency within the standard.

Background

USP 2021 requires greater than 70% recovery of organism in preparatory testing (neutralizer selection).

If you have any questions about the technical content of the ballot, you may contact me in care of:

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Chair, Joint Committee on Dietary Supplements
c/o Rachel Brooker
Joint Committee Secretariat
NSF International
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[Note – the recommended changes to the standard which include the current text of the relevant section(s) indicate deletions by use of strikeout and additions by gray highlighting. Rationale statements are in italics and only used to add clarity; these statements will NOT be in the finished publication.]

NSF/ANSI Standard for Dietary Supplements –

Dietary Supplements

7 Test methods used by testing laboratories for detection of contaminants – Dietary ingredients and finished products

7.3 Test methods for microbiological contaminants

Preparatory testing, as specified in the currently promulgated version of the USP shall be performed on all products. Certain products may themselves inhibit the multiplication of microorganisms that might be present, thus interfering with quantitative and qualitative microbiological assays detailed in Section 7.3. Products shall be inoculated with the challenge microorganisms specified in USP <2021> and USP <2022>. For the quantitative assays, at least a greater than 70% bioburden recovery compared to a control medium shall be demonstrated. For the qualitative assays, the challenge organism shall be recovered on the applicable selective media. If a product fails to meet the recovery limit, a suitable neutralizer (e.g., soy lecithin, 0.5%; or polysorbate 20, 4.0%) shall be added to the culture medium to neutralize inhibitory substances.

NOTE — In lieu of performing preparatory testing, a suitable neutralizer may be automatically added to the product and testing for the individual indicator organisms and pathogens may proceed as described in the following sections.

Rationale: The proposed revision will create more consistency within the standard.