TO: Joint Committee on Dietary Supplements

FROM: Brian Zamora, Chair of the Joint Committee

DATE: October 27, 2022

SUBJECT: Proposed revision to NSF/ANSI 173: *Dietary Supplements* (173i99r1)

Revision 1 of NSF/ANSI 173, issue 99 is being forwarded to the Joint Committee for consideration. Please review the proposal and **submit your ballot by November 17, 2022** via the NSF Online Workspace <www.standards.nsf.org>.

Please review all ballot materials. When adding comments, please include the section number applicable to your comment and add all comments under one comment number whenever possible. If you need additional space, please use the attached blank comment template in the reference documents and upload online via the browse function.

Purpose

The proposed revision will update the *E. coli* section.

Background

Section 7 provides methods used for detection of contaminants in dietary ingredients and finished products. In section 7.3.7, the only method reference for detection of *E.coli* is USP 2022 (7.3.7), which is a qualitative test. Standard 173 requires quantitation of *E.coli* in products containing botanical non-extract and in botanical non-extract ingredients to determine if material tested meets acceptance criteria of not exceeding 100 CFU/g of generic *E.coli*, thus USP 2022 method reference will not suffice if the presence for E.coli was detected.
There should be an alternative method reference provided for quantitation of *E.coli* in test material that is categorized as botanical non-extract ingredient or finished product containing botanical non-extract.

In NSF/ANSI 173 there also was no mention of the requirements for dietary supplement ingredients for *E.coli* testing. This will also be addressed in the revision.

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

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Joint Committee Secretariat
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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 Health Sciences –

Dietary Supplements

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

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7.3 Test methods for microbiological contaminants

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7.3.7. *Escherichia coli*

7.3.7.1. Generic *E. coli*

~~For finished products~~ For dietary ingredients and finished products that contain only vitamin, mineral, botanical ingredient – extract, and other dietary supplement ingredients, testing shall be performed based on the qualitative USP test for the Absence of E.coli (USP <2022>).

For dietary supplement ingredients and finished products that contain botanical non-extracts, quantitation of *E. coli* shall be performed utilizing available methods, e.g. AOAC International, USP, FDA and other. Modification of an existing method, or development of a new method, are allowable provided the method is fit for purpose.

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