789 N. Dixboro Rd,
Ann Arbor, Michigan
48105-9753 USA

T +1 734 769 8010
E standards@nsf.org
nsf.org

Joint Committee on Dietary Supplements

August 4, 2025

Proposed revision to NSF/ANSI 173 – Dietary Supplements (173i124r1)

Revision 1 of NSF/ANSI 173, issue 124 is being forwarded to the Joint Committee for consideration. Please review the proposal and **submit your ballot by August 25, 2025** via the NSF Online Workspace.

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 clarify what requirements apply to the product label and which apply to the product and testing.

Background

Sections 4.1 and 5.5 have caused points of confusion with customers. It has been unclear what requirements apply to the product label (section 4) and the Product and testing (section 5). The proposal below corrects several concerns. First, it moves the product labeling requirements to the proper section. Secondly, it details assumptions made about how many servings are assumed to occur in a day. Lastly, it summarizes all label disclosures and statements in a consolidated place (4.1) while clarifying that all caffeine will be tested and verified (5.5).

An assessment of existing regulatory and scientific literature was conducted in June 2025. Positions on dose spacing have not changed since the product requirements for supplements and finished products containing caffeine were determined in 2015. A summary of the assessment is attached.

A straw ballot was open from 6/25/25 to 7/9/25. There were several comments. The issue proponent updated the original issue paper based on those comments. The revised issue paper and the issue proponent's responses to the comments were circulated to the whole JC on 7/23 and given until 7/29 to submit comments. The only comments received were editorial. Those changes have been made in this balloted version of the issue paper.

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

Freddie Agyin, Chair, Joint Committee on Dietary Supplements
c/o Rachel Brooker, Joint Committee Secretariat
T +1 734 827 6866
E rbrooker@nsf.org

[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 grey 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 Nutrition and Wellness –

Dietary Supplements

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3 Definitions

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Ingredient Disclosures: Detailed information provided for the consumers on use of a component. Information can be found on product labels, websites, or alternate printed or digital material and are publicly available.

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4 Labeling and literature requirements

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4.1 Caffeine

Supplements containing any amount of added caffeine, including by intentional selective concentration of caffeine at the expense of other constituents from the source crude botanical, shall declare the total amount of caffeine per serving on the label.

Caffeine claims shall not exceed 200 mg per serving. The amount of caffeine for the recommended maximum servings shall not exceed 800 mg per day.

In addition, if the product contains caffeine at greater than 100 mg per serving, the following warnings (or equivalent) shall be present on the label:
• do not use if sensitive to caffeine
• not recommended for use by children under 18 y of age
• not recommended for use by pregnant or nursing women.

If the maximum serving of caffeine results in consumption of more than 200 mg per day, the following statement (or equivalent) shall also be present on the label or product ingredient disclosure:
—no more than 200 mg of caffeine is to be consumed every 4 hours.

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5 Product requirements

5.1 Identity

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5.1.2 Finished product

Manufacturers are responsible for ensuring that finished products shall contain each of the dietary ingredients and, if applicable, any subcomponent, such as marker constituents, declared on the label. The finished product identity claims shall be reviewed to determine if select claims shall be verified in accordance with Section 6.1 or 8.7. Product shall be evaluated as one (1) serving per day unless otherwise indicated or implied on the product label.

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5.5 Caffeine

Supplements containing caffeine shall have caffeine content tested and verified. ~~The amount of caffeine consumed shall not exceed 200 mg per serving every 4 h and 800 mg/d. The product use instructions shall indicate no more than 200 mg of caffeine is to be consumed every 4 h.~~

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