

#### MEMBERSHIP CRITERIA BACKGROUND

At the January 2017 Board meeting it was agreed that the draft membership guidelines presented would be revised and submitted to the Membership Committee for review. This revision has now been completed.

In order to fairly evaluate companies petitioning for membership, the following attestation document has been created. It requires that the prospective member, as well as all current members, attest to the following on a yearly basis:

- o Legal Standing
- GMP Compliance throughout the supply chain, including distributors
- Documentation of what entity(s) provides 3<sup>rd</sup> party certification
- Acknowledgement of specific issues and commitments relating adulterants and contaminants
- Agreement to participate in annual testing programs approved by the Board of Directors on an as needed basis
- Commitment to convert ingredients and products to 3<sup>rd</sup> party certified NOP Organic at a minimum and enhanced Regenerative Organic certifications such as Biodynamic, AGA, MSC, and Regenerative Organic (as defined by Rodale Institute) when possible.

# **EXPLANATION**

**Attestation** is required yearly in recognition of the changing business dynamics.

**Good legal standing**. We recognize that many actions taken by regulators may or may not be the result of actions that would require membership revocation or a denial of membership. These actions would include warning letters, ingredients/products being stopped at borders, or actual financial settlements. Therefore the attestation relates only to disclosure of rendered judgment, seizure or court action and allows for explanation of such actions.

**GMP compliance.** With the implementation of FSMA, we request all prospective and existing member companies document both that they adhere to the appropriate CFR regulations for food and/or dietary supplements, as well as identify the 3<sup>rd</sup> party certifiers they use. This applies to harvesting, processing, manufacturing, and distribution.

**Adulterants and contaminants.**— A separate section for adulterants and contaminants is designed to ensure two things. One, the company is aware and is taking the appropriate steps to ensure appropriate steps for monitoring the integrity of its supply chain, including that it is documenting steps with its partners. Two, the company is adhering to testing requirements for heavy metals, economic adulterants and micro-contaminants such as solvent residues, plasticizers and carcinogens.

**Testing programs.** All agree to participate in testing programs as defined by the Board.

**Seals**. Companies are discouraged from the use of poorly defined or undefined seals and standards including 100% natural and glyphosate free, and are encouraged to use federally recognized seals and standards as appropriate, such as certified organic and gluten-free. Other seals that the Board has determined valid and beneficial to the consumer will be included over time. These seals currently include the Non-GMO Project Verified NSF Certified for Sport and the international equivalent, "Informed-Choice, Trusted by Sport, and the American Grassfed Association meat and dairy standard.

Rengerative Practices. Organic & Natural health asserts that National Organic Program (NOP) standards serve as the minimal criteria all members aspire to and commits to promotion and adoption of regenerative practices throughout the supply chain. All will attest to a commitment to eliminate GMO ingredients/products and conversion of non-organic ingredients and formulations to first, NOP Organic, and subsequently regenerative standards, over time. In addition, the use of synthetic biology is becoming more prevalent and could compromise product safety. Organic & Natural is committed to evaluation of developments in this arena and transparency of such ingredients in the supply chain.

Documentation of the Attestation will be completed by completing the following checklist, which will be signed and dated by both the company and the CEO/Executive Director.

#### MEMBERSHIP AGREEMENT AND ATTESTATION CHECK LIST 2020

The Organic & Natural Health Association is incorporated as a 501c6 trade association committed to uniting corporations and consumers to transform business practices in relation with regenerative practices to support the health of people and planet. Membership in the Association is restricted to those companies in the dietary supplement and food sectors that can demonstrate a commitment to the following guiding principles: transparency, traceability, accessibility and a commitment to continual quality improvement.

Members of the dietary supplement and food industries that qualify as raw ingredient suppliers, manufacturers, distributors and finish products will attest to the following membership guidelines on an annual basis.

# 1. GOOD LEGAL STANDING.

□ No judgment has been rendered or seizure or court action taken against my company or its agents by an Agency of the Federal Government.

**U** Judgment has been rendered or seizure or court action take against my company or its agents by an Agency of the Federal Government.

Explanation	 	 	

#### 2. GMP Compliance

My supply chain is Third Party certified and currently compliant with the appropriate sections of 21CFR100, 21CFR111 and/or 21CFR 117.

# 3. 3<sup>rd</sup> party certification has been provided by the following entity:

- □ NSF
- □ UL
- $\Box$  USP
- □ \_\_\_\_\_(0ther)

# 4. ADULTERANTS AND CONTAMINANTS (excluding distributors)

- □ I am aware of the risks associated with adulterants and contaminants and maintain records to document any audits, testing or supplier relationships to support product/ingredient integrity.
- I have documented action to ensure the integrity of the supply chain
  - □ My products meet the minimum requirements for testing of heavy metals and micro contamination.
  - I test for adulterants and contaminants, as appropriate and necessary.

# 5. DISTRIBUTORS

□ I verify that the products in my portfolio meet the above standards relating to GMP compliance, 3<sup>rd</sup> party certification and adulterants and contaminants.

# 6. Testing Program(s)

□ I agree to participate in yearly testing programs as determined by the Board of Directors.

#### 7. Use of Seals

The Association discourages the use of seals or statements such as 100% natural or glyphosate free that do not adhere to clearly articulated and accepted standards. The Association will maintain a list of seals and standards it encourages member companies to utilize as appropriate and will add to the list over time.

□ I agree to utilize seals and standards that meet federal guidelines as appropriate, including certified organic and gluten-free, and other clearly articulated and accepted standards that the Board determines sufficient for consumer understanding and adoption.

I currently utilize the following seals

USDA Certified Organic

□ American Grassfed Association meat and dairy standard

□ Non-GMO Project Verified

□ Validated pesticide residue testing

□ Biodynamic

□ Marine Stewardship Council

- □ Regenerative Organic
- 🗆 Other

8. Organic and Regenerative Standards

I agree to work towards

- a) conversion of non-organic ingredients and formulations to first, NOP Organic, and subsequently regenerative standards;
- b) to eliminate Genetically engineered GE or GMO) ingredients in my supplier chain and/or product line, and
- c) ensure transparent, appropriate and safe use of synthetic biology.
- □ In my supply chain and/or
- □ In the products I distribute

COMPANY	_SIGNATURE	TITLE	<b>DAT</b> E
SIGNED. Haver Amard	NAME <u>Karen E. Howard</u>	TITLE CEO <u>/Ex.Dir.</u>	DATE <u>3/1/20</u>