

Turning Adversity Into Advantage:

*Nutritional Supplement Marketing in the Context Of Adverse
Events Reporting Laws*

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Introduction

If you market nutritional supplements . . .

This report is for you.

A recent Council For Responsible Nutrition Survey found that while consumer spending on nutritional supplements continues to grow at a healthy rate, consumer confidence in our products is dropping. Since 2003, public confidence in the safety and efficacy of nutritional supplements has dropped from 78% to 69%. That's almost a 10% loss of consumer trust!

With a steady annual sales growth of 6% industry wide, why should we care about this developing skepticism among consumers – they're still buying our products.

Well, the Council For Responsible Nutrition (CRN), one of the industry's leading trade associations, didn't think so. In response to this drop in confidence, they have launched two new ventures to build up the image of the supplement industry:

The first initiative is an ongoing dialogue with health professionals about the benefits of supplements. CRN President and CEO Steve Mister, put the reason behind this initiative quite plainly: “[Doctors] have the potential to drive consumers out of the market.”

The second is a partnership with the National Advertising Division (NAD) of the Council of Better Business Bureaus to increase self-regulation of advertising within the industry.

You can learn more about these two initiatives at www.crnusa.org, CRN's website.

But each of us has a role to play in restoring public confidence in our products. And each of us will benefit tremendously from it.

More consumer confidence means more sales.

And with efforts to tighten the FDA's oversight of nutritional supplements, demonstrating that we can regulate ourselves means everything for the future of this industry. We provide an invaluable alternative to mainstream medicine. Forcing us to pre-test products like pharmaceuticals is not only unnecessary, given our products' safety track record, but would also be a death knell to many of the businesses that produce such great health products.

So take this report as a few ideas on how you can improve your business by working to increase credibility.

For more ideas on marketing nutritional supplements, check out my ebook *Writing Irresistible Copy For Nutritional Supplements*. Edited by top copywriter Bob Bly, it taps into the experience of 6 other veterans of the business, Clayton Makepeace, Carline Anglade-Cole, Parris Lampropoulis, Steve Wexler, Suzanne Shelton and Peter Fogel. It's available at my website www.healthwriterclachar.com.

A Communication Chasm

The National Institute on Aging . . . The Women's Heart Foundation . . . People Living with Cancer . . . Blue Cross-Blue Shield . . . WebMD . . .

Across the board - what does nearly every major health-related website say in answer to the question, "Should I take a dietary supplement?"

Talk to your doctor.

In The American Journal of Clinical Nutrition . . . JAMA . . . The Journal of the American Dietetic Association . . . The Journal of Complementary Medicine . . . The Journal of Health-System Pharmacy . . . Family Practice . . .

What does just about every article addressing medical professionals advise on the subject of supplements?

Ask your patient about dietary supplements they are taking. Ask them three times.

And what is the reality?

In survey after survey, consumers reveal that they do *not* talk to their doctors about supplements they are taking.

Survey respondents contend that their doctor doesn't know enough; that their doctor may not approve, that their doctor doesn't have time. Some respondents from an AARP survey simply felt that it was none of their doctor's business.ⁱ

Most of these concerns are well founded. In one informal survey of doctors treating patients with arthritis, 30% of doctors felt they did not have enough information to provide appropriate counsel regarding supplements. Twenty percent of the physicians who responded to the same survey indicated that they considered most supplements to be the equivalent of snake oil.ⁱⁱ

A communication chasm (not gap) lies between Americans and their doctors when it comes to dietary supplements. Why should we in the supplement industry care? Isn't our industry about people taking charge of their own health? Isn't the onus of bridging this gap on those in the medical profession who have attacked, diminished or simply ignored our contribution to good health?

Certainly it is.

Many in the medical profession realize this too. Doctors and institutions are acknowledging that they cannot simply push us under the carpet. Not a 200 billion dollar industry that has produced so many tangible results in peoples lives.

From Memorial Sloan-Kettering to the Dana Farber Cancer Centers, nearly every major cancer center has at least a department devoted to integrative medicine. The Pharmaca Integrative Pharmacy chain has built a loyal customer base by bringing together pharmacists, naturopaths and homeopaths under one roof. Medical schools and institutions are looking carefully at how to incorporate nutrition and other healing modalities into their traditional curriculums and practices with Andrew Weill, MD leading the charge at Arizona University School of Medicine, Oregon Health and Science University and the Maine Medical Center.

In fact, in a 2005 survey conducted by Consumer Reports that involved over 34,000 readers, one in four readers reported that their doctors recommended supplements to them.ⁱⁱⁱ In another recent survey of clinicians at a North Carolina medical center, respondents expressed overwhelming interest in providing more complementary therapy services such as herbal and nutritional counseling, multidisciplinary pain management and comprehensive nutritional assessment and advice.^{iv}

And yet there is so much more work to do in bridging this chasm. But again, why us? Why is it our job to facilitate doctors talking to their patients about supplements? Why should we be concerned? Isn't one of the cornerstones of the dietary supplement industry empowering people to take control of their own health?

Increasing awareness about alternatives to allopathic medicine and allopathic medicine's limitations has convinced many people that doctors are only *practicing* medicine – not mastering it. The era when people unquestioningly took their doctor's advice is over.

So don't get me wrong, I'm not advocating a return to patients turning their health care decisions back over to the professionals in white coats.

How Our Business Can Fall Into This Chasm

The Dietary Supplement and Non-Prescription Drug Consumer Protection Act, S. 3546, the "AER" law^v, brings this gap and the implications of this gap into the foreground. In fact, this communication gap between people and their doctors only exacerbates the credibility gap that many industry leaders from Barry Perzow, to Andrew Weill, to Bob Ullman have cited as a major industry liability. How we respond to this gap, how we proactively build bridges and seek to fill this chasm with our marketing and information campaigns can ultimately shape a stronger future for nutritional supplements.

Consider this:

- According to a recent analysis of the FDA's 2002 Health and Diet Study published in the *Journal of the American Dietetic Association*, a higher proportion of supplement users with adverse events than users without adverse events were concurrently taking supplements and prescription drugs or were taking supplements instead of prescription drug to treat or prevent a health condition.^{vi}

- Using results from the same study, a Harvard Medical School research fellow found that 21% of the estimated 135 million adult Americans taking supplements also took prescription medications. About a third of prescription takers for gastro-intestinal problems, severe and migraine headaches and menopause were taking supplements. Almost a sixth of people being treated for congestive heart failure, heart disease, and a history of heart attacks were taking supplements. An estimated 1.2 million prescription drug takers also took St. John's wort which has been shown to reduce the effect of prescription medications. 26% of people with liver disease and 19% of people with kidney disease were taking non-vitamin supplements.^{vii}
- Another recent survey cited by an article in the American Journal of Clinical Nutrition noted that 70% of herbal users about to undergo surgery failed to report their use to their physicians.^{viii}

When you consider the potential interactions between supplements and prescription drugs or the contraindications for some supplements and some health conditions, these statistics (and many others like them) signal a potential wave of problems for the image of supplement manufacturers on the horizon.

Taking prescription drugs or serious illness does not prohibit the use of supplements. In fact, as Jeffrey Blumberg, PhD, researcher on antioxidant nutrients' role in disease prevention and health promotion at Tufts University points out, in many cases, medical treatment and serious health problems *require* supplementation to help remediate vitamin depletion and other side effects of treatment or symptoms of a disease.^{ix}

What these studies indicate is the necessity to find ways to help people integrate their health strategies and health products to minimize the risks and maximize the healthy results. As an industry built on the promise of health, this has to be tantamount to our interest as well.

Furthermore, we need allies in the medical field who can affirm that, "No. The supplement is not the source of the patient's problem. She already had a liver condition . . ." or a heart condition . . . or migraines . . . and so forth. Or that it was the prescription drug causing the problem, not the supplement.

The Adverse Events Reporting Law: An Opportunity

While the new AER law clearly delineates between a documented adverse event and a causal relationship between supplements and the health problem^x, it is in our best interest to clarify the distinction as much as possible. If done right, the AER law will actually bolster our image with not only skeptical consumers but also with medical professionals, a key link to prospective consumers.

As Derek Hall, Vice Chairman and Chief Executive Officer of Econet, Inc. has pointed out, "I sense an opening for our industry to excel as the drug system seems to me to be broken or at least seriously damaged. I feel that we are sitting at the edge of another

opportunity to truly shine with the new AER legislation; it will take courage by leaders of industry to stand up and be counted on this key opportunity to achieve greatness.”^{xi}

So how do we do this? How do we turn the AER law into a scaffold for a strong bridge across this gap on which we can build a stronger industry, “achieve greatness”, instead of simply hit the sharp rocks on the bottom.

Court the skeptics, and most notably, the medical profession.

Here are seven suggestions from a humble copywriter’s perspective. Depending on the campaign and the product, they may be more or less useful. But used appropriately, they can only shrink the communication and credibility gaps on the edges of which our industry is wobbling precariously.

1. People Don’t Believe the Hype

Do the research and make valid claims. In addition to the FDA and FTC’s requirements, set your own standards. While we have a tremendous need for increased studies, larger double-blind clinical trials, we already have substantial research on the benefits of our products. Use what we have, express it clearly in laypersons terms and document your sources. Both doctors and consumers have expressed in surveys a need for more information. Provide it.

Advises Al Powers, President of NOW Health Group, “When you go mainstream, people are looking for more science behind the products.”

“As a result, we have to back a lot of our claims with science. It’s not that hard to do. There’s a lot of good science out there that supports natural products. When you can support natural products with sound science, people are more willing to be patient to see results. When there’s no science, you’re right back to the old days of cause and effect.”^{xii}

Susan Haeger, former President/CEO of Citizens for Health, a leading consumer advocacy group, concurs, “Today we have much more educated, discerning and demanding consumers who require that industry be able to demonstrate product quality and efficacy claims.”^{xiii}

From an advertising expert’s perspective, Michael Masterson, copywriter and author of Power and Persuasion, points out “people most of the time want to be sold hard.”

Hard doesn't mean hypey. Hard means 'Convince me! Make me a believer.' Hard means understanding the complex emotional / psychological desire of your prospect, recognizing his beliefs and feelings, and giving him a big, multilevel promise that makes his molecules shake.

Hype is what you do when you aren't smart enough to sell smart. Hype works, but only temporarily. And it has many unpleasant ramifications.^{xiv}

A core desire of most health consumers is to find a trustworthy source. That's why so many direct mail solicitations assume the voice of a doctor. What better way to build trust than to provide clear evidence in a respectful manner.

2. Become A Presence In The Examination Room

Imagine each piece of advertisement in the hands of your customers' physicians. Better yet, create your materials to foster a link between you and the physician through the consumer. Create a lift piece with a headline . . . "Please bring this with you to your next doctor's appointment . . ." Include in it references for studies that support your product's effectiveness and safety; suggested questions about specific health concerns that relate to your product; and contact information that physicians can use to seek more information.

Perhaps you may even want to solicit physicians' input. Provide a number where physicians can provide feedback based on their patients' experiences or, at the very least, a place to register their contact information for product information updates.

Not only will you get a few juicy testimonials, you will have information that you can use to improve and refine your products. But best of all you are making your information indispensable to the doctor who is struggling to meet a changing healthcare world; *the* person who can lend your marketing efforts an authoritative punch. (Consider this, how many doctors rely primarily on brochures from pharmaceutical companies to make prescription decisions.)

Bottomline, reiterate the suggestion that consumers speak with their doctors about their usage of your products. When you emphasize the importance of this communication, you emphasize your interest in the consumer receiving the best health care possible. You position yourself as an ally of the consumer *and* of the doctor.

3. Look Risks in the Eye

Acknowledge potential risks. Before the FDA banned ephedra, the Council of Responsible Nutrition developed a warning label to put on all products containing ephedra. Then CRN CEO, John Cordaro explained, "Our philosophy has been ... to maintain consumer access to products and access to information [so that consumers can] make informed choices." Previous to the ban, Cordaro reported that 90% of ephedra manufacturers used this label.^{xv}

If you sell a product that contains St. Johns wort, provide a warning paragraph that indicates research has shown that this herb may diminish the effectiveness of certain prescription drugs.^{xvi} If you sell a product with kava in it, advise that people with liver

disease or people who are using prescription drugs that compromise their liver, to use this with extreme caution.^{xvii} If you sell a product with potentially serious risks, be up front.

When AIDS activists demanded more access to clinical trials of new treatments, they changed the way people evaluated options and made decisions about their health. They made the case that people should have the right to assess risks and decide their own course of care; that people without medical training could decipher promising studies and make their own decisions about whether it made sense for them to participate in ongoing trials.

The dietary supplement industry provides the same opportunity. Let consumers decide how they want to chart their life. But to do this responsibly, give consumers the information they need to make these decisions. When you do so, you position yourself as a trusted advisor, someone concerned for their well-being, a position that in the longrun will bring customers back to you again and again.

Overwhelmingly supplements are safer than prescription and many OTC drugs. Yet they are still powerful substances – for good and for bad. Give your consumers (and their medical advisors) the information they need to make the best decision for their health . . . ultimately the best decision for your company’s health as well.

4. Embrace Regulation as an Opportunity, Not an Obstacle

Position your company, and the industry as a whole, as a self-regulating and well-regulated, responsible industry. In addition to adding a number for reporting adverse events on your labels, highlight the new law and its implications on your website and literature. Emphasize your interest in hearing from your customers and documenting their satisfaction or dissatisfaction with your products in order to improve your products. As many companies do, describe your adherence to GMP’s and good research.

This industry has fought for and won a tremendous freedom to develop itself. With any freedom comes responsibility and that responsibility, highlighted in the right places, will sell your company.

Sandy Gooch, founder of Gooch’s Natural Foods Markets, exhorts us, “The [natural products] industry should be doing everything it can to be known as THE place for accurate information and integrity.”

“Consumers should be able to turn to the natural products industry for education, knowledge and trusted products to help them obtain and maintain optimum health and quality of life.”^{xviii}

She should know the powerful effects of being a standard-bearer. By holding the highest standards in the business, Gooch built a highly successful chain of natural foods markets.

5. Watch Your Language

Qualify words such as “natural”, “safe”, “breakthrough”, “miracle”, “magical”, “purify”, “detoxify”, “energize”. As a copywriter, I understand how powerful these words are and how they appeal to people. So I wouldn’t automatically recommend that you expunge them from your copy. However, be warned that many consumer health groups point to these words as indicators of fraudulent claims with respect to dietary supplements.^{xix} So use them with discretion, back them up, qualify them. Give them meaning and give yourself credibility.

6. Testify

Over and over again, copywriters expound that nothing beats a good testimonial. Testimonials lend authenticity to your products. They provide a person with whom your prospects can identify. They confirm to your prospects that someone else has spent their hard-earned money on your product and been satisfied with the results – if not delighted. A good testimonial is like sitting down with a trusted friend or neighbor and getting an honest recommendation.

And the best testimonials are the ones that sound like a real person. Edit sparingly, if only to meet FTC requirements, but leave the idiosyncrasies of your contented customers’ speech in place. Choose testimonials that are explicit, specific and extensive. Instead of the ubiquitous, “Thank you – you changed my life”, include the one that details the before and after. People love to hear stories. It brings their own experiences to the foreground and makes their own dreams feel closer to realization. Don’t go with hyperbole –even if it’s for real, warns Robert Bly, copywriter and author of The Elements of Copywriting. People won’t believe it.^{xx}

When appropriate, give a full attribution for each testimonial. Include the person’s full name, title (if necessary), city and state. People believe the testimonial more if they can believe that the person really exists. These details make the person real and give your literature credence.

Finally, good testimonials lend authority to your claims. Testimonials from health professionals do this exceptionally well. But a good layperson testimonial, qualified with references elsewhere in your piece to related research works just as well if not better. Choose ones that are honest about initial reservations about your product or the time it took for your product to work. These are realistic, especially since so many healing processes take time. As Al Powers noted earlier, if you can provide your customers with a longer perspective, you can instill patience in them, give your product time to work and ultimately ensure that all subsequent customers are as satisfied the one who testified for you originally.

7. Make and Offer They Can’t Ignore

The businesses I go back to as a customer are the ones that have communicated that their goal is my satisfaction. Make an offer, a return policy that communicates this to your customers. I've seen one company that will refund a full year's worth of payments for their immune-boosting supplement if the customer is not satisfied after a year! When you make an offer like this you tell that customer that you have absolute faith in the quality of your product. When you have this much confidence in your product, it's harder for a prospect to doubt you.

And as I mentioned above, many supplements take time to have a noticeable effect. So, to the extent that you can afford to, give your customer time to notice the effects of your product. Consider offering a two months return policy or more. Guarantee their satisfaction in the time necessary for them to experience that satisfaction.

And not only does this kind of offer build credibility, it deflects the criticism of supplement manufacturers that we are swindling customers by selling products that don't work. There are certainly cases that bear out this accusation. But all in all, we know our products are worth the money. Why not show your customers that you are putting your money where your mouth is. This shows a further understanding of your customer's reservations, and says that you will go the extra mile to put their fears to rest. Now, that makes a sale.

Conclusion

These suggestions are built on the extensive track record within the dietary supplement industry of providing well-documented, quality products; of building alliances; of regulating itself. They are also built on my experience as a health educator, a health information advocate, a health writer and, most importantly, a mother, a wife, a daughter and a middle-aged woman. People like me are looking for credible means to improve their lives.

158 million Americans and counting think we offer these means. Otherwise they wouldn't try us. We need to continue to build on that interest and solidify it with well-earned trust. The medical community, while often our harshest critic, is potentially and currently in many cases, our best ally. Government regulators have created regulations in consultation with representative trade groups such as the Natural Products Association, the American Botanical Association and the Council for Responsible Nutrition that in many ways further our goals to become a significant part of the American health care scene. Our industry is becoming a partner that can't be ignored or dismissed.

Truthfully, many people are also still susceptible to hype, still seek magic pills, still like quick fixes. And as any salesperson can tell you, many a sale is closed on an impulse. The suggestions I have offered may, in some cases, defer a sale or even lose it by encouraging longer consideration of the offer and the product. But these techniques may also garner sales from the many skeptics, myself included, who seek out every bit of information before making a purchase. The same skeptical people, however - once

satisfied, will come back again and bring other customers with them. By using these prospective customers to connect to more people, even those within the medical profession, you also realize a larger market base from one lead. So, in the right place, in the long run, these techniques may more than offset any losses.

Our marketing efforts are opportunities to project our image to people who are looking for solutions to the challenging problems in their lives –whether it be obesity, chronic diseases such as diabetes or simply the cumulative wear and tear that comes with aging. For help, they seek out our products and they go to their doctors. Let’s do what we can to make sure our message is reinforced and they will keep coming back.

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I welcome any comments on this report. Please contact:

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The Healthy Weight Forum <http://www.healthyweightforum.org/eng/articles/dietary-supplements/>
The Women's Heart Foundation http://www.womensheartfoundation.org/content/Nutrition/dietary_supplements.asp
Blue Cross-Blue Shield <http://www.ehdesign.com/pih/herbal.htm>
People Living with Cancer <http://www.plwc.org/portal/site/PLWC/menuitem.034b98abc65a8f566343cc10ee37a01d/?vgnnextoid=1367ea97a56d9010VgnVCM100000f2730ad1RCRD>
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