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RE: Opposition to SB 115/AB 440 Substitute Amendment 1

To the Wisconsin Legislature:

On behalf of Standard Process Inc.[®], I submit this memo to reiterate the Company's opposition to SB 115, including opposition to the latest version Senate Substitute Amendment 1 and Senate Amendment 2 to Substitute Amendment 1.

Standard Process is a Wisconsin-based manufacturer of nutritional whole food supplements. Standard Process is a family held business which recently celebrated 80 years in business and employs approximately 280 Wisconsin residents and is one of the few companies that has continued to grow despite the current economic environment. Recently, Standard Process has been recognized as one of America's Healthiest Companies by the Wellness Councils of America and as one of INC Magazine's fastest growing private companies in America.

We are greatly disappointed by the timing and short notice of this most recent version of SB 115/AB 440 and by the fact that we were never contacted despite our expressed willingness to participate in conversations to attempt to find a workable solution. Because our customers include various medical doctors, chiropractors, dieticians, nutritionists and many other complementary and alternative practitioners, we believe that our perspective and insight would be beneficial, if not unique. We submit that if concerns exist over standards, qualifications or oversight, each of those items can be addressed short of fencing out whole groups of practitioners and setting up a government-established monopoly of practitioners with criteria established and controlled by an industry association which has its own vested interests.

This latest version of SB 115/AB 440 continues to prohibit complementary and alternative health care professionals from offering valuable nutritional advice, and integrating and applying principles derived from the sciences of food and nutrition management to achieve and maintain optimal human health. In addition to the effect SB 115/AB 440 would have on individual complementary and alternative practitioners, SB 115/AB 440 would drastically limit nutritional counseling options available to Wisconsin residents to only those practitioners who follow the American Dietetics Association (ADA) standards, effectively closing the door on any alternative schools of thought on nutrition and eliminating practitioners that residents might otherwise seek out when traditional and conventional methods and thinking are not working for them.

We at Standard Process recognize the value that complementary and alternative care providers have in helping people to live healthier lifestyles. As such, we believe that a wide variety of

health care professionals are qualified and should be allowed to provide nutritional counseling to their patients. Many legitimate complementary and alternative health care professionals belong to professional organizations besides the ADA, have other degrees, and can offer Wisconsin residents valuable nutritional advice and alternatives. In addition, being in business for 80 years, we have seen many conventional theories change with time and scientific developments. We recognize the importance of not ruling out alternative theories of thought.

For these and many other reasons, we strongly urge you to **oppose** SB 115/AB 440, the “dietitian’s” licensing bill, including the recently offered substitute amendment. I would welcome the opportunity to discuss this bill and our concerns further if desired.

Thank you in advance for your consideration.

Yours in Health,
Standard Process Inc.

Scott J. Vandenhouten
General Counsel