



Obesity Action Coalition

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July 7, 2026

Written Testimony Submitted Electronically

Docket No. FDA-2025-N-6895

Pharmacy Compounding Advisory Committee (PCAC)

July 23-24, 2026 Meeting

Re: Patient Perspective on Pharmacy Compounding and Access to Obesity Treatment

Dear Members of the Pharmacy Compounding Advisory Committee:

On behalf of the Obesity Action Coalition (OAC), thank you for the opportunity to provide comments regarding the July 23-24, 2026 meeting of the Pharmacy Compounding Advisory Committee.

The OAC is the nation's leading nonprofit organization dedicated to improving the lives of people affected by the disease of obesity through education, advocacy and support. For more than 20 years, we have represented the patient voice while working to improve access to evidence-based obesity care, eliminate weight bias and ensure that people affected by obesity are treated with dignity and respect.

We appreciate the Committee's thoughtful consideration of the issues surrounding pharmacy compounding and recognize the importance of protecting public health through safe, effective and appropriately regulated medications.

The OAC agrees with concerns regarding the importance of patient safety, product quality and treatment effectiveness. Patients deserve medications that are safe, effective and produced under rigorous quality standards. At the same time, we believe it is essential that this discussion not lose sight of the people at the center of this issue. There are over a 100 million Americans living with obesity who have spent years navigating a healthcare system that has too often failed them.



For decades, people affected by obesity have faced limited treatment options, inadequate insurance coverage, widespread weight bias and significant barriers to evidence-based care. Many have been told that obesity is simply a matter of willpower or personal responsibility despite overwhelming scientific evidence that obesity is a complex, chronic disease.

Today, we finally have highly effective FDA-approved treatments that are improving health and changing lives. We have also seen encouraging progress over the past year as manufacturers have introduced lower-cost direct to patient options for several FDA-approved obesity medications. This represents meaningful progress. However, hundreds of dollars each month remains unaffordable for many individuals and families, particularly when obesity treatment continues to be excluded from standard health insurance benefit design. While prices have come down, access has not caught up.

The unprecedented demand for obesity medications, including compounded GLP-1 products and now increasingly for alternative peptide products, should be viewed as an important signal. It reflects not simply demand for alternative products, but the enormous unmet need for affordable, accessible obesity treatment. Patients have been searching for options because the healthcare system has not consistently provided access to FDA-approved therapies. The long-term solution is not reliance on compounded or peptide medications. The long-term solution is ensuring that obesity treatment becomes part of standard health insurance benefit design so that people living with obesity can access FDA-approved therapies in the same manner as individuals living with other chronic diseases.

In the short term, however, we recognize many patients are being forced outside the system and, therefore, need to know that the compound they are taking is safe. This is not a long term solution but a short term fix to a much larger problem. Here are our suggestions to make compound GP-1 medications and compounds as safe as possible. As FDA considers future policy regarding compounded medications, OAC believes several patient protections are essential.

Qualified Medical Oversight

Medications used to treat a chronic disease should be prescribed and managed by appropriately trained, licensed healthcare professionals who can evaluate medical history, monitor treatment response, manage side effects and provide continuity of care.



Transparency

Patients deserve clear, accurate information about the medications they receive. Every individual should understand whether a medication is FDA-approved or compounded or peptide product, how it was produced, what evidence supports its use and what uncertainties may exist regarding safety or effectiveness. Patients cannot make informed decisions without transparent, understandable information.

Reasonable Oversight

Facilities involved in compounding, dispensing or administering medications, including medical spas and other nontraditional settings, should meet consistent quality standards and be subject to appropriate regulatory oversight and inspection.

Reporting and Accountability

Patients should have simple, reliable mechanisms for reporting adverse events. Regulators and healthcare professionals need timely, complete information to identify emerging safety concerns and respond appropriately.

Ingredient Sourcing and Traceability

Patients have the right to know what they are taking, where active pharmaceutical ingredients originate and whether those ingredients meet established standards for quality, purity and safety. We are increasingly concerned about another consequence of limited access: the rapid growth of an unregulated marketplace for peptide products.

Every day, patients are exposed to advertisements on social media, online marketplaces and other digital platforms promoting peptides for weight management, muscle preservation and healthy aging. Many of these products are labeled as "research chemicals" or "not for human use," while simultaneously being marketed directly to consumers seeking treatment. Patients have no reliable way of knowing what these products actually contain. They may not know where the active ingredient was manufactured, whether the product has been independently tested for purity, whether it contains the stated dose or even whether it contains the advertised ingredient at all.

People affected by obesity are not seeking these products because they want to avoid the healthcare system. Many are turning to them because they cannot access affordable,



evidence-based treatment through traditional channels. This should concern all of us. Patients deserve better than navigating an online marketplace where safety, quality and authenticity are uncertain. No one managing a chronic disease should have to wonder whether the medication they purchased actually contains what the label says. As policymakers evaluate future regulatory approaches, every effort should be made to reduce the circumstances that push patients toward unregulated products and to educate the public about the potential risks products may pose.

The patient community should never be forced to choose between no treatment, unaffordable treatment and uncertain treatment. The demand for compounded medications and now increasingly for unregulated peptide products is not the underlying problem. It is a symptom. It is a symptom of a healthcare system that has not kept pace with the science of obesity treatment.

Patients are telling us they want safe, effective and affordable treatment delivered under the supervision of qualified healthcare professionals. They want transparency. They want accountability. They want comprehensive care. Most importantly, they want the same opportunity to manage a chronic disease that people living with other chronic diseases expect every day.

As the Committee considers these important regulatory questions, we respectfully encourage FDA to continue placing patient safety first while recognizing the broader healthcare challenges that have contributed to this moment. The lasting solution is not simply determining which products can or cannot be compounded. It is building a healthcare system where people living with obesity can reliably access FDA-approved treatments, receive comprehensive medical care and not feel compelled to seek treatment through less regulated channels.

OAC appreciates the opportunity to provide the patient perspective and looks forward to continuing to work with FDA to improve both the safety and accessibility of obesity treatment. Please reach out to Tracy Zvenyach, PhD, MS, with questions at tzvenyach@obesityaction.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Nadglowski", is positioned above the typed name.

Joe Nadglowski
President & CEO
Obesity Action Coalition