

It is estimated that there are greater than 1200 animal health products that are not registered with the Vermont Agency of Agriculture. It is also estimated that there are greater than 500 feed supplements that are not currently registered.

Examples of these “non-feed” products are: vitamins-single or multivitamins, minerals (other than in block form), skin and coat support, hoof support, joint and bone support, cuttlebones, crushed oyster shells, salmon oil, lysine, electrolytes, enzymes, hairball gel, beneficial bacteria, probiotics etc.

Additionally, products containing hemp and CBD, but not intended for nutritive value would be considered a “non-feed” or “supplement, as well as bee pollen, mushrooms and herbal remedies (containing ginseng, chamomile, St. John’s Wort, valerian root, etc.) .

The State of **Oregon** registers Animal Remedies. In Oregon. “Animal Remedy means any product used to prevent, inhibit or cure or enhance or protect the health or well-being of animals, but does not include food. (ORS 596.095). The registration fee is \$100 per product.

In **South Dakota**, animal remedies are “All drugs, combination of drugs, proprietary medicine, biological products, and combinations of drugs & other ingredients, other than for food or cosmetic purposes, which are prepared or compounded for animal use, except those exempted by the secretary of agriculture.” The registration fee is \$75 per product.

In **Virginia**, Animal remedies are “Drugs, combinations of drugs, proprietary medicines, and combinations of drugs and other ingredients other than for food purposes of cosmetic purposes, which are prepared or compounded for animal use, except for those exempted by the commissioner.” The registration fee is \$25 per product.

In **North Dakota**, “Livestock medicines include all devices, remedies, cures, tonics, powders, proprietary medicines, type A medicated articles, and similar preparations for the treatment or prevention of any disease of livestock, poultry or other domestic animals.” The registration fee is \$40 for 2 years.

If Vermont were to develop an “Animal Remedy” category of registration, it would eliminate the confusion of whether a product needs to be registered. The Agency of Agriculture would make the determination of whether a product is a feed or a remedy. This would allow the Agency to regulate the animal remedy/ supplements being sold in Vermont.

https://www.nutraceuticalsworld.com/issues/2016-04/view_columns/pet-nutrition-a-legal-rundown/

DRAFT Animal Health Supplement

There is a difference between commercial feed, feed supplement, animal health supplement and animal remedy.

- A commercial feed is “all materials except whole seeds unmixed or physically altered entire unmixed seeds, when not adulterated within the meaning of subsection 327(a) of this title, which are distributed for use as feed or for mixing in feed.” Examples of this type of product include livestock grain, dog food, cat treats, wild bird seed mixes etc. These products are registered as feed products. (VT Statute definition)
- A feed supplement is a feed used with another to improve the nutritive balance or performance of the total and intended to be fed undiluted as a supplement to other feeds or offered free choice with other parts of the ration separately available or further diluted and mixed to produce a complete feed. Examples of this type of product are vitamin or mineral mixes etc. These products are registered as feed products. (AAFCO definition)
- An animal health supplement is any product marketed to prevent or cure or enhance or protect the health or well-being of livestock, poultry or other domestic animals that does not require a prescription from a licensed veterinarian and not intended for cosmetic purposes, and is other than food or exempted by the secretary. Examples of this type of product include, CBD, glucosamine, probiotics etc. These products should be registered as animal health supplements. (new definition)
- An animal remedy is an animal health supplement requiring veterinary prescription, or a drug as defined in title 6 §323. Examples of this type of product include flea and tick prevention, horse wormers, prescription pain medication. These products should not be registered.

Is the product a feed product or an animal health supplement?

Does the product have a guarantee for protein, fat and fiber?

If yes, most likely it is a feed.

If it only has a guarantee for protein, fat or fiber, it may be an animal health supplement. (i.e cod liver oil, may make a claim for fat)

If not, the product may be an animal health supplement.

Does the label make a claim about taste, aroma or nutritive value of the product?

If yes, it is a feed product.

Is the product an ingredient that is added to an animal feed and provides nutrition?

If yes, the product is an ingredient and should be registered as a feed product.

If not, the product may be an animal health supplement.

Does the product make a claim that it is used to prevent or cure or enhance or protect the health or well-being of livestock, poultry or other domestic animals and does not include a GA for protein, fat and fiber?

If yes, the product is an animal health supplement.

Does the product require a prescription by a veterinarian?

If yes, it is considered a drug and does not need to be registered by VAAFM.

Key Label Words

Feed Products

- Diet, dinner, food, feed
- Treat (if it has protein, fat and fiber guarantee)
- Complete and balanced
- Stew, plate,
- Vitamin, mineral

Animal Health Supplement

- NASC seal
- Probiotic, enzymes, glucosamine, chondroitin sulfate, yucca etc.
- List of active ingredients