

Per AAPFCO, 37 states register soil amendments and biostimulants. Of these 37 states, 32 charge a fee per product, 4 charge a flat fee, and 1 registers the products but do not charge a registration fee. The average registration fee per product is \$76.

For the states closest to Vermont, Connecticut registers products, but does not charge a fee, Maine registers with a fee of \$25 per product, Massachusetts registers with a fee of \$100 per products, Rhode Island registers with a fee of \$50 per product, New Hampshire does not register products, New York does not register products.

While there is no easy way to determine how many products are registered by each state, we do know that Maine registered 477 amendments in 2014 and the number has increased annually to 705 products in 2017. Minnesota registered 350 products in 2014 and registered over 550 products in 2016 (fee of \$200 per product). North Dakota currently has 561 registered products.

It is estimated that Vermont could register 560 products. With a registration fee of \$85 per product, the revenue generated from registration of these products would be nearly \$50,000 annually.

National Animal Supplement Council (NASC) is a non-profit organization created in 2002. Per their website: *"The goal of NASC is to provide a unified, consistent voice for animal health and nutritional supplement companies, create responsible and nationally consistent labeling and advertising guidelines, and provide consistent quality and production process controls for the industry."*

NASC recognizes a category of products called "animal health products". Per their definition, Dosage-Form Animal Health products are "articles (other than food) intended to affect the structure or any function of the body other than providing nutrition". These products "have a specific structure-function claim and would be classified more like a drug."

NASC lists 198 members are listed on their website. Of these, 123 have undergone a *"comprehensive audit and earned the NASC Quality Seal"*. It is difficult to determine just how many companies market supplements, but it is most likely greater than 198. For companies that are not audited by NASC, they may or may not follow similar guidelines.

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.

It is difficult to determine how many animal health products are registered in other states because some states lump these products together with Animal remedies and includes medications administered under veterinarian care (vaccinations, antibiotics, wormers etc.) or they do not register them.

Vermont would be a leader in registering these “Animal Health Products” which are recognized by NASC, but often fall between the cracks under FDA jurisdiction since these products are not “feed” products nor have most of them been accepted as “drugs”.

With the registration fee of \$105 per product, the revenue generated from registration of these products would be over \$178,000 annually.

Registered Feed Products by Year

Type	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Animal Health Product	66	61	62	66	67	56	44	74	55	108
Feed Product	5,886	5,876	6,296	6,688	7,863	8,422	9,064	9,086	9,041	9,173
Feed Supplement	811	803	875	890	1,113	1,126	1,062	898	952	1,028
Ingredient	443	449	462	421	471	462	474	473	454	481
Treat	2,525	2,445	2,746	2,834	3,944	4,011	4,116	3,968	3,914	4,130
	9,731	9,634	10,441	10,899	13,458	14,077	14,760	14,499	14,416	14,920