

Dosage Form Animal Health Product or Feed Supplement?

Dosage Form Animal Health Products and Feed Supplements are similar, but very different. Some of their labeling requirements are similar, but there are key differences. This document will help you determine the category of the product.

Dosage Form Animal Health Product

means "any product intended to affect the structure or function of the animal's body or enhance or support the health or well-being of livestock, poultry, dogs, cats, or other domestic animals that does not provide nutritional benefit, does not require a prescription from a licensed veterinarian, is not intended for cosmetic purposes, or is exempted by the Secretary by rule. [...]" 6 V.S.A. § 323 (1)

Feed supplement

means "a material 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." 6 V.S.A. § 323 (9)

To determine if a product is a Dosage Form Animal Health Product (DFAH) or feed supplement please review the VAAFM's label guidelines:

[Dosage Form Animal Health Product Label Guidelines.](#)

[Feed Supplement Label Guidelines](#)

If you are still uncertain, review the label closely using the following clues.

	Dosage Form Animal Supplement	Feed Supplement
What are the listed ingredients?	If the label claims an ingredient is for "the structure or function of the animal's body" or to "enhance or support the health or well-being" of the animal consumer.	If the ingredients can be found in the Association of American Feed Control Officials' Official Publication, and the label claim is for nutritional benefit of the intended animal consumer.
How are the ingredients listed?	Ingredients will be broken out into active and inactive ingredients. The active ingredients will be listed in order of quantity in descending order. The quantity of each ingredient per serving is also listed (unless a proprietary blend is	Feed supplement ingredients are listed in order of amount per serving in descending order.

	used, then the active ingredients must be listed in order of quantity in descending order). Inactive ingredients, listed separately, are listed in alphabetical order or in descending order by predominance of ingredients.	
Is there a Guaranteed Analysis?	There is no guaranteed analysis.	Feed supplements include a guaranteed analysis for protein, fat, and fiber.
How is the product administered?	DFAH products provide instructions or directions for <i>administering</i> the product.	Feed Supplements include <i>feeding</i> instructions. If a product is added to feed, it is most likely a feed supplement. If a product is mixed with or sprinkled over food, or top-dressed, it is a feed supplement. If it is mixed or added to drinking water, it is a feed supplement.
What are the claims on the label?	If the label makes a structure-function claim and does not make a nutritional claim, the product is most likely a DFAH product. Examples of claims: helps support healthy joints, promotes relaxation, helps manage everyday stress, supports a normal immune response, addresses stiffness and discomfort due to exercise.	If the label claims there is any nutritional value in the product, the product is a feed supplement. Examples: improves feed efficiency, increases nutrition absorption, supports digestion, easy to feed, nutrition/nutritional, calories, vitamins etc.
All labels must contain <ul style="list-style-type: none"> • Product name, • Manufacturers name and contact information, • Intended species 	Additionally, * <ul style="list-style-type: none"> • Net weight, net content, or count • Any precautionary statements or warnings 	Additionally, * <ul style="list-style-type: none"> • Net weight or volume in avoirdupois and metric measurements • follow all guidelines for labels of feed product

*Additionally, any product containing hemp or CBD, needs to have the following statement in the label. ““These statements have not been evaluated by the FDA. These products are not intended to treat, cure or prevent any disease.” Similar statements are common on DFAH products.

Why are Labels Rejected?

Sometimes a product is rejected because there is an issue with the label. A notification will be issued and there is opportunity to amend the label and resubmit without an additional fee.

Labels are rejected:

- 1) Disease claims are made on a DFAH product label. Disease cannot be mentioned on a label (including arthritis).
- 2) Nutritional information is included on a DFAH label. A guaranteed analysis for protein, fat and fiber cannot be on a DFAH product label, nor can any words pertain to nutrition.
- 3) Essential label elements are missing such as contact information, weight, ingredient list. Or ingredients aren't listed in the correct format.
- 4) It is unclear which category a product fits into. In this case, you will be given information on how to change your label to fit into either category.

VAAFM understands that a lot of work is put into developing a product and marketing it for sale. VAAFM worked with the National Animal Supplement Council to develop its guidelines. Because Vermont is one of the first states to require registration of dosage form animal health products, we meticulously review your labels in anticipation that other states will develop similar guidelines. This may lessen the chance that you will have to amend your labels for other states.