Protecting Pets and Horses
Empowering Consumers &
Supporting Economic Growth
The Animal Health Supplement Act of 2026
Issue Brief

Introduction: Animal Health and Nutritional Supplements

Many pet owners, horse owners, and veterinarians believe that supplements can benefit animals at every stage of life. These products are provided to support good nutrition and targeted health benefits throughout an animal's lifespan. They contain ingredients such as glucosamine, chondroitin, MSM, probiotics, vitamins, minerals, and herbs, with targeted health benefits that can support normal physiologic structure and healthy function of their bodies. Animal health supplements can come in many forms, such as tablets, capsules, powders, pastes, liquids, and soft chews and are intended for consumption by companion animals, such as dogs, cats, and horses.

There are two categories of animal supplements: health supplements and food/feed supplements. These are two distinct product categories, which are regulated differently by the Food and Drug Administration (FDA).

- ✓ **Health supplements are considered by the FDA to be unapproved new animal drugs (UNADs) of low enforcement priority.**

- ✓ **Feed/food supplements are considered food products and may contain only nutrients and other ingredients to benefit the animal's health.**

Overview: The U.S. Animal Supplement Industry

- Pet ownership expanded to 94 million U.S. households in 2024, up from 82 million in 2023, fueling explosive growth in the companion animal supplement market.
- In the United States alone, pet supplement sales have surpassed $2.7 billion, reflecting the deep commitment pet owners have to their animals' health and well-being.
- Including equine products, total U.S. animal supplement sales are estimated at $3.6 billion annually. This represents a compound annual growth rate of nearly 20% from 2018 to 2023, demonstrating sustained consumer confidence in these products.
- The U.S. animal supplement industry has become a significant driver of economic activity, supporting small businesses and creating substantial employment opportunities in manufacturing, distribution, retail, and related services. The industry particularly benefits small and medium enterprises, with many supplement companies operating as family-owned businesses.

Research indicates that up to 90% of veterinarians in North America accept the use of supplements, and 30% to 50% of pet owners use these products based on veterinary recommendations. The National Animal Supplement Council (NASC) believes that ensuring the safety of companion pet/equine health and feed/food supplements is paramount to peace of mind for both pet and horse owners, as well as veterinarians.

Current Federal Regulatory Framework for Animal Supplements

In the absence of a clear regulatory pathway outlined by Congress, the FDA, through its Center for Veterinary Medicine (CVM), has grappled with an inconsistent approach to regulating animal supplements, which creates significant confusion and uncertainty for manufacturers, owners, and veterinarians. Specifically, the FDA uses the following definitions to distinguish between animal food and animal drugs:[1]

> ***Food****: "The agency typically considers a product to be food if the product affects the structure or function of the body and this effect is derived mainly from its nutrition, taste, or aroma. Examples include a dog food containing calcium that may affect bone structure in puppies and a cat food containing the amino acid taurine that may help with heart health in cats."*
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> ***Drug****: "In determining if a product marketed as a food product is actually a drug, the agency considers the product's intended use. If the intended use is to treat or prevent a disease, then the product is a drug. If the intended use is to affect the structure or function of the body and this structure or function effect isn't derived mainly from the product's nutrition, taste, or aroma, then it's a drug. Examples include a product intended to make a cat's urine more acidic to maintain urinary tract health and a product intended to improve joint function in an arthritic dog."*

Under the FDA's current framework, animal nutritional supplements (e.g., vitamins, minerals, and essential fatty-acids) are classified as feed/food supplements and therefore regulated as animal food. As a result, these products are limited to providing essential nutrients and other ingredients intended to support animal health a*nd must comply with animal food requirements*.

However, products containing ingredients that provide non-nutritive benefits may be treated by the FDA as animal health supplements—a category the FDA considers to be an Unapproved New Animal Drug (UNADs).[2] As a result, these products are technically unlawful to market without FDA approval. Historically, however, the CVM has exercised enforcement discretion for many animal health supplements, particularly those marketed solely with structure/function claims, supported by a strong history of safe use, and manufactured in accordance with voluntary industry standards, such as the NASC guidelines.

Existing Federal Regulatory Structure for Animal Supplements Creates Confusion and Thwarts Innovation

Due to the current inconsistent regulatory approach, the companion animal health supplement industry operates in a regulatory gray area that serves neither pets and horses nor their owners or veterinarians well. As a national industry operating across all 50 states, the companion animal health

[1] https://www.fda.gov/animal-veterinary/animal-health-literacy/fdas-regulation-pet-food
[2] https://www.fda.gov/animal-veterinary/products/animal-foods-feeds

and feed/food supplement industry stands at a critical juncture. Given its rapid growth, the industry can no longer operate in an environment of regulatory inconsistency, irregularity, and increasing uncertainty. The absence of a clear federal regulatory framework for animal health supplements leads to a range of challenges, including:

- Regulatory uncertainty and confusion for manufacturers, marketers and retailers, discouraging companies from expanding operations, hiring additional workers, and investing in product innovation because of ongoing uncertainty surrounding federal oversight.
- Reduced confidence among veterinarians as well as dog, cat, and horse owners regarding the safe and appropriate use of animal health supplements.
- A patchwork of state laws that creates compliance challenges and potential barriers to interstate commerce which is impossible for a national industry.

Current NASC Voluntary Animal Supplement Quality System Requirements

In the absence of clear federal requirements, NASC, over its 25-year history, has developed a comprehensive voluntary compliance program that establishes strict guidelines for product quality assurance, good manufacturing practices, risk management, adverse event reporting, and labeling and claims. These standards have contributed to remarkably low adverse event rates despite the significant volume of product use. Today, more than 80% of the industry participates in the NASC program.

- Companies that successfully complete the NASC Audit Program are authorized to display the NASC Quality Seal on their products, websites, product literature, and advertising.
- The NASC Quality Seal helps consumers identify products manufactured by companies that meet rigorous quality and safety standards.
- Only NASC member companies that comply with NASC's stringent requirements for manufacturing, labeling, adverse event reporting, and that demonstrate responsible participation are permitted to use the NASC Quality Seal.

As part of its quality assurance program, NASC has also developed and implemented the most advanced post-market surveillance system in the world for animal supplements through its NASC Adverse Event Reporting System (NAERS®). An adverse event is a complaint linking the use of an animal health or nutritional supplement to a negative physical effect or health problem in a dog, cat, or horse. The NAERS system collects and analyzes reports of adverse events involving animal health or nutritional supplements.

- The NAERS® database tracks more than 100 billion supplement administrations for dogs, cats, and horses in real time. The system's ability to monitor and analyze safety data in real time provides a level of consumer protection that often exceeds the FDA's post-market surveillance requirements for many approved products.
- NASC's extensive surveillance data demonstrates that adverse events are rare and, when they do occur, are typically minor.

- The NAERS® database uniquely enables adverse event reporting and monitoring by ingredient or product, while also aggregating member product administrations by stock keeping unit (SKU)[3]. Although the data remains confidential among NASC members, the FDA has been granted access to the database, allowing regulatory oversight without formal approval processes.
- Each NASC member is required to investigate and resolve every reported adverse event and submit a monthly report, even if no adverse events occurred during the reporting period.
- Over more than two decades of use, this system has demonstrated the strong safety profile of animal supplements.

In addition, NASC has developed product labeling templates and advertising standards in consultation with FDA/CVM input to help consumers better understand the appropriate use of these products to support and maintain animal health. NASC members are required to comply with these guidelines or face disciplinary action, including expulsion from the organization.

About the National Animal Supplement Council (NASC)

Founded in 2001, the National Animal Supplement Council (NASC) is a nonprofit trade association with a clear mission: **To promote the health and well-being of companion animals and horses given animal health and nutritional supplements by their owners and to protect and enhance the animal supplement industry.** NASC carries out this mission for the benefit of millions of dogs, cats, and horses that rely on animal health and nutritional supplements to live their healthiest, happiest lives.

The NASC represents more than 300 members who collectively market and track more than 7,000 products with over 1,400 ingredients, demonstrating the industry's scale and commitment to co-regulation, which has been developed and implemented by working cooperatively with the FDA's CVM and state regulatory agencies.

[3] A SKU, or Stock Keeping Unit, is a unique alphanumeric code, typically 8-10 characters long, used to identify a product; a SKU is unique to an individual product and captures all the distinguishing characteristics of the product, such as manufacturer, flavor, unit size, dosage, etc.