

Supplement products are coming under scrutiny at the behest of the Association of American Feed Control Officials (AAFCO) and the United States Food and Drug Administration. The AAFCO is an association formed to help officials of various governmental agencies (including the FDA) convene to explore problems related to the regulation of animal feeds, as well as to help those agencies communicate with industry in an effort to help ensure that products sold to animal owners are both safe and effective.

Supplement products sold to animal owners have not been closely regulated. As a result, there are a seemingly endless number of supplement products on the market, and an equally endless assortment of supporting claims for their usefulness. But herein lies the problem; many of the ingredients in such products are not recognized as safe for inclusion in animal feeds. Many of them may not be pure and many make what are clearly “drug claims.” That is, they state or imply, by word or by picture, that the product diagnoses, treats, cures, helps or prevents disease. There are many laws on the state and federal books to prohibit this sort of behavior. If the ingredients in a product are possibly unsafe or the product isn’t pure, or if the claims made for the product are exaggerated so as to make it look like a drug, that’s simply not OK. In fact, such products are in violation of state and federal laws. AAFCO and its members have become concerned with the current status of many animal feed supplements. As veterinarians interested in both the well being of our animal patients and the financial well being of our human clients, we share those concerns.

By law, ingredients put in animal feeds must be defined and submitted for approval through AAFCO. We are convinced that this is prudent. Products should not be submitted for approval as a nutrient and then marketed using drug claims. Products should meet label claims for purity. Products should be safe, as well as effective. Incredibly, no person or company has ever approached AAFCO or the US Food and Drug Administration with the information required to identify the ingredients in many supplements, as has been done with approved animal feed ingredients.

We find the current state of affairs unacceptable. Quite simply stated, reasonable laws exist to help protect the health and well being of animals and we feel that those existing laws should be enforced.

We feel that it is unfortunate that reasonable efforts to regulate the supplement market are under attack. We cannot imagine that animal owners would want anything other than products that are safe and that contain what is listed on the labels of those products. However, we do recognize that some people may be convinced that a product “works,” with regard to some medical or physiological problem – even if there’s no evidence that it does – and that’s good enough for them. We realize that such people may not see any reason to take a product off the market when they perceive that it has been sold and used for years without safety concerns. In addition, manufacturers of such products may not be keen to have them closely regulated – for obvious reasons. Thus, we recognize that protests may be inevitable, both from the people who perceive animal health benefits from such products, and from people and manufacturers who receive financial benefits from their sale.

Nevertheless, we feel morally and ethically obliged to address larger issues. The fact is that the current marketplace is full of products that have not been proven to be safe or effective. Are there any consequences to the animals being fed such products? What about food-producing animals? Should they be fed questionable products that might enter the food chain? Should there be a distinction between food-producing and companion animals? Should the current federal and state statutory requirements be enforced to provide necessary protection to both consumers and their animals? Should consumers be protected from products that are not pure, products that wouldn't "work" even if the ingredient alleged to be in the product were effective? Or should it just be a free market and "buyer beware?"

We support the AAFCO in its stance that some regulation is a good thing. History has proven, beyond question, that no regulation is a medical disaster, and completely fails to protect the consumer. We find it disturbing that opponents of reasonable regulation appear to be trying to inflame public opinion. In fact, currently used supplements are not necessarily "illegal;" however, they may be unapproved or undefined. In fact, no wholesale removal of *any* product from the market place is currently planned; nor is there any plan for action against products that meet AAFCO standards. We support AAFCO's efforts to select one ingredient that is undefined, unapproved for use in animals and, according to the US Food and Drug Administration, will have some danger to animals, and target it for enforcement activity.

The fact is that current rules and regulations have been largely ignored and violated by some supplement marketers and entrepreneurs. We feel this is wrong. Common sense dictates that consumers and veterinarians are entitled to know that the products they are buying for, or prescribing to, animals are safe, effective and pure, and that the regulations designed to ensure such standards are being vigorously enforced by taxpayer-funded law enforcement and regulatory agencies.

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