

NASC Treat Program Guide

How treats are regulated, what's allowed on labels, and what it takes to earn the NASC Quality Seal for treats



What Is the NASC Treat Program and Why Was It created?

For 25 years, the National Animal Supplement Council (NASC) has set the industry standards for quality in animal health and nutritional supplements for dogs, cats, and horses.

Now, the NASC Treat Program brings structure and oversight to the treat category while supporting responsible innovation, maintaining compliance, and protecting animal health.

Treats are an expanding category with an estimated value of \$12-\$14 billion, and demand is rising. But confusion exists in the marketplace about how treats are regulated. (Not to mention past incidents have occurred, reinforcing the need for stronger post-market surveillance and risk management.)

NASC's approach is co-regulation: working collaboratively with state and federal regulators to support:

- Regulatory compliance
- A fair, level playing field
- More consistent enforcement
- Education-focused compliance (preventing issues instead of reacting)



NASC's Scope At-a-Glance: Three Product Categories

NASC's scope focuses on products for dogs, cats, and horses (non-human-food-chain animals). NASC does not cover complete and balanced diets.

NASC member companies may have products in one or more categories:

1. Health Supplements (non-food)

- Products similar to human dietary supplements
- Intended for non-nutritional health benefits
- Not regulated as food

2. Food Supplements (food)

- Nutritional products (vitamins, minerals, essential fatty acids, etc.)
- Intended to contribute nutritionally as part of a complete and balanced diet
- Regulated as food

3. Treats (food)

- Regulated as food
- Defined by the term “treat”



The Single Most Important Rule: “Treat” = Food

Core takeaway: One word can change how a product is regulated.

Using the word “treat” (or other food terms) classifies the product as food.

Other food-trigger words include:

- Snack
 - Cookie
 - Biscuit
 - Jerky
 - Peanut Butter
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How Treats are Defined (AAFCO-aligned)

A) Dogs & Cats (pets)

Treats are intended to be given occasionally for:

- Enjoyment
- Training
- Entertainment
- Other limited purposes (example: dental treat, pill pocket, maybe nutrition)

Treats are not generally intended to be:

- A complete food
- A food supplement

B) Horses

AAFCO does not provide a “horse treat” definition as it does for pets, but:

- Horse treats are still regulated as food
- Purpose statements should include “treat” or “snack”

“Occasionally”—What It Means in Practice

Treats are meant for occasional use, not consistent nutritional delivery.

However, a dental treat may be acceptable if:

- The label is consistent with the product’s purpose (mechanical/abrasive dental action)
- Claims stay within food boundaries (see next section)

If a product is designed to deliver a daily nutritional benefit (like vitamins/minerals), it should be labeled as a food supplement, not a treat.

Ingredient Rules for Treats

For treats (food), ingredients must:

- Be approved for use in animal food
- Appear in AAFCO Chapter 6 or be referenced in applicable CFR provisions
- Be included only for their intended purpose

Key example: turmeric/curcumin

If an ingredient is approved as a spice/flavoring/seasoning, you can’t use it (or market it) for an unapproved purpose such as anti-inflammatory benefits on a treat label or any food product.

Other ingredients discussed as examples of non-nutritional benefit ingredients (problematic for treats when used for health claims) include:

- Chamomile
- CoQ10
- MSM
- Milk Thistle
- SAMe

Claims Boundaries for Treats (food claims only)

Treat claims must stay within the allowable “food” boundaries, such as:

- Taste
- Aroma
- Nutritional value (that is consistent with intended use)
- Technical effects (e.g., preservative)
- Dental claims via mechanical/abrasive action

Claims outside these boundaries can trigger:

- State registration challenges/stop-sale notices
- FDA enforcement risk (including warning letters for egregious claims)

Why “Functional Treats” Are a Problem

“Functional treat” is a marketing term, not a regulatory category.

The concern is that “functional” often implies health benefits beyond food claim boundaries, which creates:

- Industry and consumer confusion
- Regulatory inconsistency
- Increased enforcement risk

Another core takeaway: Avoid dual-purpose positioning (nutritional + non-nutritional health benefit) in treats.



NASC Treat Program Requirements (how to qualify)

A) NASC Membership

To join NASC (or expand an existing membership scope to include treats), a company must:

- Have a direct conversation with NASC leadership (to ensure they qualify, it's a good fit, and to prevent avoidable compliance issues)
- Agree to follow standards appropriate to the products sold

NASC may point out issues early (example: “calming treats” positioned with health benefits).

B) Treat cGMPs

NASC Treat cGMPs are based on FSMA animal food requirements (21 CFR 507), with added expectations, such as adverse event reporting and post-market surveillance. These requirements were reviewed by the NASC compliance team and treat industry participants.

C) NAERS Participation (adverse event reporting)

Participation in the NASC Adverse Event Reporting System (NAERS®) is required of treat supplier members as part of:

- Post-market surveillance
- Early warning for potential safety issues
- Overall risk management

D) Labeling Guidance and PFLM Alignment

NASC's treat labeling guidance is intended to be consistent with AAFCO (including PFLM).

Guidance includes:

- Treat labeling pre-PFLM and post-PFLM
- Dog/cat treat labeling
- Horse treat labeling

Using the NASC Quality Seal on Treats

A) Existing Audited NASC Members

If you are already an audited NASC member:

- You **cannot** automatically use the Quality Seal on your treats
- You must submit updated paperwork and pay the associated fees to add treats to your membership scope
- Contact your NASC account manager to request verification of whether you need an audit. Requirements may include a desk audit (virtual) and potentially an on-site audit, as well as additional checks including:
 - Treat label/website/marketing review (labels, literature, trade show materials, social media)
 - Confirm treats are entered into NAERS®
 - Vendor or manufacturing verification (especially if treats are manufactured by a 3rd party)

If your regular audit renewal is due soon, treats scope can be incorporated to avoid duplicate expenses.

B) New Members with Treats Only

New members must complete onboarding (three required trainings) and show they have:

- A written quality manual (even if using a contract manufacturer)
- Vendor verification and upstream qualification in writing
- SOPs for in-house operations and oversight for those they outsource
- Proper labeling/claims positioning (including website)
- NAERS product entry

Audit type and cost depend on operational scope (e.g., 3PL/never touching product may qualify for remote review vs. onsite).

Treat companies that pass the NASC Quality Audit may use the yellow NASC Quality Seal, a credible symbol of quality for more than 25 years.

Important Clarification from NASC

- Dual category products are prohibited because it violates state/federal law (the product must be “clean” in its regulatory category).
- NASC treat labeling guidance aligns with AAFCO (no separate approach).
- “Cookie” is considered a food term (as well as treat, snack, biscuit, jerky, peanut butter, etc.).
- Structure/function-type statements may be allowed for animal food if they are truthful, substantiated, and nutritionally linked (example: calcium/phosphorous supporting bones/teeth).
- It’s the intended use/claim—not the ingredient alone—that primarily drives the regulatory pathway.
 - Example: Vitamin E as a nutrient source vs. positioning vitamin E as an anti-aging antioxidant/free radical neutralizer.
- NASC audits are company/process oriented, not a certification of each individual product. Auditors may sample a subset of products/labels.
- The NASC Quality Seal does not change state registration requirements, and compliance with approved ingredients/uses still applies.
- Treat labels generally do not require the same detailed feeding directions as complete and balanced diets; directions can be simple (e.g., “Feeding Directions: Give as a treat.”), unless a claim triggers additional requirements for guarantees.

Ready to Move Forward?

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the NASC Treat Program**](#)

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NASC Team a Question**](#)

