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11 November 2025

s 9(2)(a)

By email: s 9(2)(a)
Ref: H2025073824

Tēnā koe s 9(2)(a)

Response to your request for official information

Thank you for your request under the Official Information Act 1982 (the Act) to the Ministry of Health – Manatū Hauora (the Ministry) on 8 October 2025 for information regarding vaping product testing and regulatory enforcement. Please find below a response to each of your questions in turn.

> *"Under the Official Information Act 1982, I respectfully request the following information regarding vaping product testing and regulatory enforcement in New Zealand.*
>
> *### 1. Vape Product Testing (2020–2025)*
>
> *Please provide a list of all vaping products that have been chemically tested by or on behalf of the Ministry of Health (or contracted parties such as ESR) between January 2020 and October 2025 to verify **nicotine concentration and label accuracy**. For each product tested, please include:*
>
> *- Product name / brand*
> *- Notified Product ID or internal reference (if applicable)*
> *- Labelled nicotine concentration (mg/mL)*
> *- Actual nicotine concentration found*
> *- Whether the product passed or failed compliance thresholds*
> *- Whether any follow-up action (e.g. product recall, warning, or prohibition) was taken*

On 24 October 2025, the Ministry contacted you in accordance with section 18B to of the Act, as your request was for a very large volume of information and may be refused under section 18(f) as it could not be made available without substantial collation or research. As we have not heard back from you, the Ministry has decided to respond to your request providing non-compliant products from 2024 onwards only.

The Ministry remains willing and open to working with you on new a refined request.

Between January 2020 and October 2025, a total of 440 vaping products were tested. Out of those, 227 were determined to be non-compliant.

Document one provides information relating to non-compliant products tested between April 2024 to May 2025.

Please note there are two compliance thresholds for nicotine testing for vaping products:

1. If the vape contains nicotine concentration exceeding 31.85 mg/mL (this incorporates a margin of error related to testing, on top of the legislative limit of 28.5mg/mL).
2. Whether the relative difference between the tested nicotine concentration and what was labelled exceeds 10%.

2. Internal Assessments or Concerns

Please provide any internal memos, summary documents, audit reports, or briefing papers from 2020–2025 discussing:

- Prevalence of nicotine mislabelling in vape liquids sold in New Zealand
- Health or regulatory risks associated with this issue
- Any action plans, enforcement strategies, or trend analysis

The Ministry has identified three documents within scope of this question. All documents are itemised in Appendix 1 and copies of the documents are enclosed. Where information is withheld under section 9 of the Act, I have considered the countervailing public interest in release in making this decision and consider that it does not outweigh the need to withhold at this time.

Please find a summary of each document below:

- **Document 2** – A memo from June 2024 which summarises the need to continue testing vaping products and explains the health and regulatory risks associated with non-compliant vapes identified at the time.
- **Document 3** – A memo from August 2025 which summarises the continuing need to test vaping products.
- **Document 4 –** A table summarising the proportion of tested vaping products by different nicotine concentration brackets, and a graph showing the distribution of tested vaping products by different relative concentration brackets.

3. Testing Coverage

Please confirm:
- The total number of notified vape products in New Zealand as of October 2025
- The total number of those that have undergone nicotine composition testing
- Any relevant metrics on market surveillance or resource allocation for this purpose

Between January 2020 and October 2025, a total of 440 vaping products were tested for nicotine concentration.

As of 31 October 2025, there are 7,421 actively notified vaping products in New Zealand.

From September this year, the Ministry of Health has increased the testing capacity and will now test the nicotine levels of up to 400 vaping products a year. This compared to a total of 440 products tested to date since January 2023, when the testing programme started.

For your information, the Ministry works with New Zealand Institute for Public Health and Forensic Science (PHF Science) to test the nicotine concentration in vaping products. In the last year, the Ministry of Health has invested more in supporting PHF Science to carry out more frequent and reliable vaping product testing. There continues to be high level of products tested (47.2%) that either exceed the legal limit for nicotine or are not consistent with nicotine levels stated on product labelling.

The Ministry of Health continues to work with vaping product manufacturers and importers to ensure they understand their legal obligations and withdraw products that are not compliant. A regularly updated list of prohibited vaping products withdrawn from market is available on the Ministry of Health website here: www.health.govt.nz/regulation-legislation/vaping-herbal-smoking-and-smokeless-tobacco/requirements/prohibited-vaping-products.

We encourage people who have concerns about vaping product available for sale to check the Ministry of Health's list of withdrawn vaping products. They can also submit a complaint to the Ministry of Health about a product online: www.vaping.harp.health.nz/submissions/new.

The regulatory framework under the Smokefree Environments and Regulated Products Act 1990 requires vaping product manufacturers and importers to notify the Ministry about their products and declare they meet all relevant meet safety standards. They are not required to provide the Ministry with pre-market testing data. The Ministry undertakes routine surveillance testing of nicotine, propylene glycol, and vegetable glycerine. The Ministry can direct PHF Science to test other substances if required.

> *### 4. ESR Test Results (if held)*
>
> *If the Ministry does **not** hold full laboratory results (e.g. raw ESR testing data), please confirm whether this information is held by ESR, and either:*
>
> *- Transfer this part of the request to ESR under s14 of the OIA, **or***
> *- Provide contact information or a referral so I can request it directly"*

Please refer to question 1.

I trust this information fulfils your request. If you wish to discuss any aspect of your request with us, including this decision, please feel free to contact the OIA Services Team on: oiagr@health.govt.nz.

Under section 28(3) of the Act, you have the right to ask the Ombudsman to review any decisions made under this request. The Ombudsman may be contacted by email at: info@ombudsman.parliament.nz or by calling 0800 802 602.

Please note that this response, with your personal details removed, may be published on the Ministry website at: www.health.govt.nz/about-ministry/information-releases/responses-official-information-act-requests

Nāku noa, nā

Jane Chambers
Group Manager, Public Health Policy and Regulation
Public Health Agency | Te Pou Hauora Tūmatanui

Appendix 1: List of documents for release

#	Date	Document details	Decision on release
1	31 October 2025	Non-compliant laboratory testing results - April 2024 to May 2025	Released in full.
2	June 2024	2024 ESR Annual Plan memo	Some information withheld under section 9(2)(b)(ii) of the Act; to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information.
3	August 2025	2025 ESR Annual Plan memo	
4	31 October 2025	Prevalence of non-compliant tests	Released in full.

Te Pou Hauora Tūmatanui Public Health Agency

MANATŪ HAUORA MINISTRY OF HEALTH

Memo

Post-market surveillance testing of vaping products

Date:	24 June 2024
To:	Dr Andrew Old, Deputy Director-General, Public Health Agency | Te Pou Hauora Tūmatanui
Cc:	Jane Chambers, Group Manager, Public Health Policy and Regulation, Public Health Agency | Te Pou Hauora Tūmatanui
From:	Gill Hall, Manager Ope te Tatua, Public Health Agency | Te Pou Hauora Tūmatanui
For your:	Action

Purpose of report

1. This memo raises risks and issues with the current vaping product testing approach and seeks your endorsement of the future direction of post-market testing as we develop a product strategy.

Issue with current post-market surveillance testing

Background to the current testing programme

2. One of the purposes and intent of the Smokefree Environments and Regulated Products Act (the Act) is to minimise harm and regulate the safety of vaping products. The Act and regulations require manufacturers to test their products annually and report the results to the Director-General of Health (DG). Section 71 of the Act allows the DG to request additional safety information about a product if they have reasonable safety concerns about a product.
3. The Ministry of Health (the Ministry) contracted ESR in January 2023 to perform post-market surveillance testing for regulated products. There is no strategy in place which guides what product testing should be undertaken, including what action is required following receipt of testing results.
4. This testing programme was introduced by the Vaping Regulatory Authority (VRA) as part of a suite of testing and scientific analysis (method development, quality assurance testing, environmental sampling, and understanding the vape product landscape) aiming to support the regulatory functions of the VRA, and to give effect to the (now repealed) 2022 amendments to the Act relating to the Tobacco Regulatory Authority (TRA).
5. The Ministry positions vaping products as harm-reduction tools only to be used by people who smoke cigarettes. It would be reasonable to expect vaping products to contain the level of nicotine they claim to have, so consumers can make informed choices when deciding what products to use on their journey to quit smoking.

6. There are several benefits to collecting and analysing vaping product testing data; these include supporting policy work on manufacturing polices and supporting product monitoring (by providing objective safety-related information on products) and compliance work (for product ingredients and labelling).

7. The regulated products team is still building its capability to fully recognise these benefits.

Issues with testing results from 2023-24

8. Since January 2023, ESR has tested 116 vaping products with a total spend of s 9(2)(b)(ii) [redacted]

9. In January 2024, we analysed testing results from products sourced in March 2023 with the Intelligence, Surveillance, and Knowledge group (ISK) and found 36 out of 51 products tested had a variance of over 10% between tested nicotine concentration[1] and what was labelled on the product.

10. Further analysis was done for products sourced in June and November 2023, with similar results.

11. The VRA has identified problems with data quality from ESR which means we can't be confident that the test results are representative of the vaping product market. These issues are a result of ESR testing expired products, delays between when products were procured and then tested, and volumes of products tested.

Impact of 23/24 testing results

12. s 9(2)(b)(ii) [redacted] the results are concerning, because they indicate that at least some vaping products are not being manufactured in a high quality, consistent manner.

13. The overall risks and issues identified include:

    i. the need for clearer requirements for product testing

    ii. the regulated products team capacity to respond to the issues in a timely way and develop app opriate compliance/communication processes

    iii. product non-compliance, dating back to March 2023 which poses legal and reputational risk for the Ministry.

Addressing the issue

Remedial approach

14. To address the issues above, the testing programme is being incorporated into a broader regulated products strategy, and into the general work programme.

15. The regulated products strategy will consider the testing regulations and highlight opportunities to ensure regulatory compliance in the pre-notification phase, notification

1. Officials from Medsafe have advised the VRA that a +/- 10% variance between the labelled and tested amount of active ingredient is common in the pharmaceutical industry and is also used for quality tests for medicinal cannabis as required under the Misuse of Drugs (Medicinal Cannabis) Regulations 2019[1].

process, through to post-market monitoring and surveillance. The strategy will ensure that the testing programme provides assurance that actions taken at all stages are effective. We will provide an overview of the broader products strategy to you once it has been developed.

Options for post market surveillance testing

16. s 9(2)(b)(ii)

17. We have explored other options for the testing programme. The options are discussed below, and the analysis of options is in Table 1.

Option 1: Cancel the current testing programme

18. Cancelling the ESR testing programme has the following risks:

    i. reputational – the public may perceive cancelling the test programme as the Ministry not taking product compliance seriously. It would also signal to manufacturers and importers that the Ministry is not interested in product quality or compliance with the Regulations.

    ii. public safety – the Ministry has identified a significant proportion of products containing different amounts of nicotine than the label claims. Choosing not to investigate the issue further may result in many users continuing to over or underdose their vapes.

    iii. failing to give effect to the Act, as its purpose is to minimise harm and regulate the safety of vaping products.

Option 2: status quo

19. This option continues testing through ESR but not take any compliance action as a result.

20. There are reputational risks to continue to test while not taking compliance action. Testing without follow up could negatively impact on the public trust and perception of the Ministry, it may appear that the Ministry is unwilling to take any action against vaping manufacturers.

21. If we continue to test, we also have an obligation to inform manufacturers or importers of products that their products contain more nicotine than is labelled, even if they do not take any action to remedy this.

Option 3: Increase number of products tested and develop compliance pathway

22. Continuing to test and take compliance action aligns with the intention of the Act to minimise harm and regulate the safety of vaping products.

23. The VRA commissions ESR to conduct testing, looking at nicotine concentrations only, as a proxy for manufacturing quality.

24. Compliance action is undertaken based on the results of testing, with additional triplicate testing in instances where notifiers dispute the veracity of testing results.

Table 1 – summary of options

	Option 1: Cancel the current testing programme	*Option 2: status quo - continue to test, continue to not use the testing results*	*Option 3: Increase number of products tested and develop compliance pathway*
Alignment with intent of the regulator	- -	*0*	+ +
Cost	*$0K*	s 9(2)(b)(ii)	s 9(2)(b)(ii)
Risks (negative means increased risk)	- -	*0*	+ +
			Recommended

Key

+	Slightly better than status quo
+ +	Significantly better than status quo
-	Slightly worse than status quo
- -	Significantly worse than status quo

25. Our recommended approach is option 3 s 9(2)(b)(ii)

Budget and contract management

26. The budget ringfenced for testing for FY 2024/25 is s 9(2)(b)(ii) and we expect option 3 to fall within that total. The forecast budget allows for some contingency funding for additional proactive and reactive projects that have been identified as valuable. These are either ad hoc in nature or not fully scoped at this time and include:

    a. pilot testing of other substances if appropriate (Appendix 2)

    b. specific project based and reactive testing of products for compliance and enforcement purposes

    c. testing of other nicotine containing products as required (eg, heated tobacco, or oral tobacco products)

    d. further surveillance testing

    e. reactive testing in response to an adverse event report.

27. Priorities for this additional testing will be determined following completion of the product strategy.

28. s 9(2)(b)(ii)

s 9(2)(b)(ii)

29. If managed well the proposed post market surveillance testing option will require at least 0.5 - 1 FTE[3] on an ongoing basis to support.

30. We will provide a detailed breakdown of resource model and priorities once the product strategy is completed.

31. We will report quarterly on progress of this programme of work.

Addressing 2023/24 testing results

32. We will close out the 2022-2024 testing programme. To do this, we will contact all notifiers of tested products and provide their results by 31 July 2024. Following this, we will work with the communications team to publish a summary of these test results by 30 September 2024 on the Ministry Website.

33. s 9(2)(b)(ii)

However, we will direct ESR to retest all products (and/or other products from the relevant notifiers) that have been identified as failing by a significant margin in the 2024-2025 programme.

34. We have also identified a number of SOP's, processes and templates (eg, for letters to manufacturers) that are required. As resourcing allows, we will continue to develop these. These will support timely processing of test data in future and will allow our decision making around additional testing of non-compliant products to be more streamlined.

Next steps

35. We are meeting with ESR and confirming the testing programme and cost for the 2024/25 year.

36. We will contact all notifiers of tested products to provide their results by 31 July 2024.

37. The VRA will provide you with quarterly updates on this work programme, including test results.

38. We will provide a product strategy by the end of July 2024.

[3] We have considered that the following activities are needed – project management of testing, analysis of results, follow up notification and publication of results, additional compliance case management where required. In addition, there is initial development of SOP's to manage this work.

Recommendations

It is recommended that you:

1	Endorse	testing option 3- surveillance testing of 250 products annually, and stage two (triplicate testing) where required.	**Yes/No**
2.	Note	the VRA will update you quarterly on the product testing results.	**Noted**
3	Note	the VRA will develop a product strategy by the end of July 2024.	**Noted**

Signature  _____ Date: 5 July 2024

Dr Andrew Old
Deputy Director General
Public Health Agency | Te Pou Hauora Tūmatanui

Appendix 1 - The current scope of product testing, budget and findings to date

1. ESR test a random sample of vaping substance products available on the New Zealand market. These are randomly selected using the HARP public database of notified products. These are either vaping liquids sold as refilling solutions or replacement pods, or pre-filled vaping devices.
2. ESR tests each product for:
   a. Nicotine concentration
   b. Propylene glycol (PG) concentration
   c. Vegetable glycerine (VG) concentration
   d. And calculate the PG:VG ratio
3. ESR make written observations relating to schedule 5 of the Smokefree Environments and Regulated Products Regulations relating to safety including labelling and take photos.
4. Approximately 10% of products tested are also tested for:
   a. Ethanol concentration
   b. Water concentration
   c. pH (how acid, neutral or alkaline the substance is)
   d. Colour observation of the liquid
   e. Density of the liquid
5. In the 2023-2024 financial year, ESR has so far tested 116 products with s 9(2)(b)(ii) [redacted]
6. ESR reports are received monthly as written reports and a meeting to discuss specific reports and test results.
7. The January 2024 analysis by ISK found 55 out of 66 products (83%) tested to date had a variance of over 10% between the tested nicotine concentration and what was labelled on the product.
8. Testing data results provided by ESR since January 2024 has consistently shown:
   a. at least 25% of products tested have greater than 10% variance between the labelled nicotine concentration and the tested nicotine concentration.
   b. there are a number of products still available on the market that testing indicates contain more than the maximum 28.5mg/mL freebase nicotine (free-base) concentration. These are often mis-labelled as 50mg/mL nicotine salt.
   c. a large number of products do not meet labelling requirements, are using prohibited variant (flavour) descriptions, do not have removable batteries, or have prohibited imagery (cartoons) on the packaging.

Appendix 2 – testing for other substances.

1. Currently the most useful information we receive from the ESR testing programme is nicotine concentration as it's the active ingredient in vapes, and it's legislated for.

2. Propylene glycol and glycerine (PG/VG) are tested as a package with nicotine. PG/VG ratios can be important from a consumer experience perspective, as they affect the 'mouth feel' of vapour, but there are no known safety considerations.

3. The Regulations prescribe a list of prohibited compounds that vaping substances cannot contain, and an additional list of prohibited compounds that have a maximum concentration limit. While the VRA can request these compounds be tested for, routine or surveillance testing for all or some of the prohibited compounds would be expensive to implement and have limited benefit in terms of safety or compliance action.

4. Any changes to what chemical compounds we direct ESR to detect and quantify is likely to increase costs substantially as all tests will need to be validated prior to entering routine use and many will require purchase of reference standards. There will also be a time delay in when these tests can become routine as it takes time to validate these tests.

5. Some of the prohibited compounds would only be detected if they had been purposefully added (eg, caffeine, taurine, prohibited sweeteners). They're unlikely to be introduced to the vaping substance by accident. It would be most beneficial to test specific products if we had other evidence that these products contained these compounds.

6. Our recommended approach is to review and rank the many compounds and additives that could be present in vaping products and carry out small scale pilot tests on those that are most harmful and most likely to be present. Where issues are indicated through the pilot testing, we will investigate further. We will develop this as part of the ongoing programme.

A specific note about testing for heavy metals:

7. Heavy metals are often cited in literature about the health harms of vaping.

8. There are two potential sources of heavy metal contamination in vaping products – vaping substance ingredients and the metal wire used for the coil. As the coil heats it will shed heavy metals into the vapour. This is supported by the research below showing that increased vaping resulted in higher heavy metal biomarkers.

9. The current testing methodology will not detect contamination from coils, as that requires regular use of the vaping device.

A specific note about testing for flavour compounds:

10. It has been suggested that testing for specific flavour compounds may be useful to determine whether a product has the same flavour it claims to have, or to ensure that a product is suitable for sale in a GVR (ie, it is only mint, menthol or tobacco flavour).

11. Flavour chemistry is complex to test for. There are a lot of individual chemical compounds that make up what we perceive as a flavour. For example, vanilla flavour can consist of 3-4 different vanillin compounds. There is also a lot of overlap in chemical compounds for different flavours, the same compound may appear in a flavour labelled coconut or peach.

12. At the moment, a chemical test for flavour compounds is not a good indicator of how the flavour or aroma will be perceived. This is not specific to vaping substances, many flavour

profiles of food ingredients are determined by a mixture of chemical assay, and taste and aroma testing by humans.

13. The cost of testing for flavours as a surveillance tool is prohibitive. This is because of the number of reference standards required and the time needed to analyse the results.

Te Pou Hauora Tūmatanui Public Health Agency

MANATŪ HAUORA MINISTRY OF HEALTH

Memo

Renewing the post-market surveillance testing annual plan with PHF Science

Date:	26 August 2025
To:	Dr Andrew Old, Deputy Director-General, Public Health Agency | Te Pou Hauora Tūmatanui
Copy to:	Jane Chambers, Group Manager, Public Health Policy and Regulation
From:	Gill Hall, Manager, Regulated Products
For your:	Approval

Purpose of report

1. This memo seeks your approval to renew the annual plan under Schedule 4 – Vaping and Smoking Product Testing Services, of the contract between the Ministry of Health (the Ministry) and Public Health and Forensic Science (PHF)[1]. This plan will be in effect from 1 July 2025 to 30 June 2026.
2. The proposed annual plan for 2025-2026 will increase the number of vapes tested annually from 250 to 400, at a cost s 9(2)(b)(ii) The proposed plan is available in **Appendix 1.**

Background and context

3. Schedule 4 was introduced in 2023 as part of a suite of testing and scientific analysis aiming to support the regulatory functions of the Regulated Products team (RPT). The analysis includes method development, quality assurance testing, environmental sampling, and understanding the vape product landscape. Services relating to tobacco testing have since been repealed from the programme, with the vape testing services remaining.
4. The vape testing programme supports RPT's compliance work, ensuring nicotine concentrations in vaping products are below the legal limit, and meet label claims[2]. It also informs potential future policy work on manufacturing quality requirements.
5. In June 2024, the RPT renewed the annual plan with PHF, increasing the number of products tested routinely to 250 annually, at a cost of s 9(2)(b)(ii) (see **Appendix 2** for approval memo).
6. s 9(2)(b)(ii)

[1] formally the Institute of Environmental Science and Research (ESR)

[2] Clause 1(i) in Schedule 5 of the Smokefree Environments and Regulated Products Regulations 2021 require vaping products to contain nicotine in concentrations that matches what the label claims.
Clauses 14 and 15 describe the maximum nicotine concentration limits in vaping products.

Surveillance testing results and actions to date

7. Surveillance testing enables monitoring of the quality of vaping products on the market to provide a view of compliant products and to support consumers to make informed choices when deciding which vapes to purchase.

8. Testing in the 2024-2025 financial year, showed 59 of 125 products tested were non-compliant, either having nicotine concentrations over the legal limit, and/or below or exceeding 10% of label claims.

9. The RPT has successfully worked with notifiers of 70% of those non-compliant products either taking corrective actions or withdrawing non-compliant products from the market. We continue to work with notifiers of the remaining 30% of products. Withdrawn products have been published on the Ministry's website from July 2025 onwards.

s 9(2)(b)(ii) [redacted]

Annual plan proposal for the 2025-2026 financial year

15. RPT requested PHF revise the annual plan for 2025-2026 s 9(2)(b)(ii) [redacted]
Increasing the number of products tested is useful for several reasons.

    a. **To build public and stakeholder confidence in the regulatory system** - the past year has seen an increase in scrutiny on product compliance from the Minister and the public. This follows a recently published article in the New Zealand Medical Journal[3], the Ministry beginning to publish a list of non-compliant products on our website, the Suntree Vanilla Cream product that was found to contain excess diacetyl, and testing Relx-branded vapes that Health New Zealand has purchased for a smoking cessation programme.

[3] https://nzmj.org.nz/media/pages/journal/vol-138-no-1616/an-assessment-of-e-liquid-label-accuracy-in-aotearoa-new-zealand/7b25f848bd-1748991345/6924.pdf [accessed 18 July 2025]

b. **To ensure product safety** - testing more products is likely to increase the likelihood of identifying non-compliant products, providing an opportunity to ensure greater assurance of product safety.

c. **To strengthen compliance and deter non-compliant behaviour** – robust and consistent testing sends a clear signal to the industry that requirements are actively enforced. This sets a level playing field while encouraging the use of good manufacturing practices.

16. PHF have proposed a plan to reduce s 9(2)(b)(ii) increasing the annual number of products tested routinely from 250 to 400.

17. Under this contract the Ministry has the option to utilise an extra 150 tests, s 9(2)(b)(ii) For example, if products in a line have recently been tested as non-compliant, additional targeted testing could support compliance actions across the entire product line.

18. This s 9(2)(b)(ii) has been reviewed by Procurement and our Finance Business partner. Procurement have advised no contractual variations are required for the annual plan update.

Next steps

19. RPT will finalise the proposed annual plan with PHF and return a final draft to you for signing as delegated authority.

20. We will work with the contract review team in the PHA to ensure the new contract for the 2025/26 financial year is fit-for-purpose, and still meets the long-term objectives of RPT and aligns with government priorities.

Recommendations

It is recommended that you:

1.	note	the proposed **post-market surveillance testing annual plan** with Public Health and Forensic Science for 2025/2026 will increase the number of vapes tested annually from 250 to 400, s 9(2)(b)(ii)	Yes
2.	approve	the renewal of the **post-market surveillance testing annual plan** with Public Health Forensic Science for the 2025/2026 financial year, s 9(2)(b)(ii)	Yes/No
3.	note	we will provide you a finalised copy of the annual plan for signing in due course.	Yes

Signature _____ Date: 27/08/2025

Dr Andrew Old
Deputy Director-General
Public Health Agency

Appendix 1 – Draft 2025-26 Annual Plan

Available on Sharepoint

Appendix 2 – Previous approval memo

Available on Sharepoint

Proportion of vaping products tested in each concentration bracket

	2023 total	2024 total	Jan/Feb 2025	Apr/May 2025
0 to 28.5 mg/mL	59.80%	80.17%	82.54%	86.21%
28.5 to 31.85 mg/mL	5.51%	7.37%	4.76%	6.90%
31.85 to 35 mg/mL	2.43%	2.13%	3.17%	0.00%
35 to 50 mg/mL	24.29%	6.76%	7.94%	3.45%
More than 50 mg/mL	7.96%	3.57%	1.59%	3.45%

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