

September 24, 2021

Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
1400 Independence Avenue SW
Mailstop 3758
Washington, DC 20250-3700

Re: Docket No. FSIS-2020-0013, Certified Products for Dogs, Cats, and Other Carnivora; Inspection, Certification, and Identification as to Class, Quality, Quantity, and Condition

Dear Sir or Madam:

The Pet Food Institute (PFI), the voice of U.S. dog and cat food makers, appreciates this opportunity to comment on Docket No. FSIS-2020-0013, titled Certified Products for Dogs, Cats, and Other Carnivora; Inspection, Certification, and Identification as to Class, Quality, Quantity, and Condition.

Established in 1958, PFI is the trade association and the voice of U.S. cat and dog food manufacturers. Our 25 members account for the vast majority of the dog and cat food made in the United States, with more than \$38 billion in domestic annual dog and cat food sales and \$1.7 billion in annual exports to more than ninety countries. PFI membership also includes companies that supply ingredients, equipment and services to dog and cat food makers. We are proud of our strategic alliance with the National Grain and Feed Association, as well as our coordination with the American Feed Industry Association and the North American Renderers Association on a range of issues.

Our members, who account for well over 90 percent of U.S. dog and cat food production and feed the vast majority of the 180 million pets in U.S. households, operate under regulations issued by the U.S. Food and Drug Administration and enforced by both federal and state officials. This means dog and cat owners throughout the United States and around the world benefit from science-based regulation that provides the safest animal food supply available anywhere.

Our comment is brief – we agree with the U.S. Department of Agriculture’s (USDA’s) Food Safety and Inspection Service (FSIS) proposal to end its fee-for-service certification program for pet food, codified in the regulations at 9 CFR part 355. The USDA FSIS program, which certifies that certain pet foods, including dog and cat food, are “produced under sanitary conditions and meet compositional and labeling requirements,” is decades old and has not been used for some time, as the agency indicates in its proposed rule. Moreover, we agree with USDA FSIS that this program’s existence alongside the well-recognized FDA regulations for pet food may lead to unnecessary confusion among pet food makers and consumers.

In September 2015, FDA issued its Preventive Controls for Animal Food (PCAF) final rule under the Food Safety Modernization Act (FSMA), which was the most significant update to the Federal Food, Drug and Cosmetic Act in seventy years. The FSMA PCAF rule employs the preventive approach to food safety

called for in FSMA, requiring animal food makers to: put in place current good manufacturing practices; develop, implement and update a food safety plan; and conduct a hazard analysis, which includes identifying and addressing known or reasonably foreseeable hazards. The FSMA PCAF rule is the recognized regulation for animal food producers, with both federal and state inspectors conducting inspection, surveillance and enforcement activities based on the principles and requirements in the rule.

PFI actively participated in the rulemaking process, providing FDA with substantive comments to ensure the rule was science-based and facilitated the production of safe pet food products. Since the FSMA PCAF rule was finalized, PFI members have worked hard to understand and comply with its provisions. We agree with USDA FSIS that ending a program that has neither been updated nor used in some time is both efficient and adds regulatory clarity for stakeholders. We wholeheartedly support this proposed move.

On behalf of PFI members, whose nearly 25,000 employees in 32 states provide safe food for hundreds of millions of dogs and cats in the United States and around the world, we thank you for this opportunity to share our views. We support FSIS efforts to streamline regulations in a manner that facilitates the production and availability of safe foods here and abroad.

Sincerely,



Dana Brooks
President & CEO