

Wednesday, 5 December 2018

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Director, International Animal Health Standards Team

U.S. Department of Agriculture

Animal and Plant Health Inspection Service

Dear Dr David:

The Pet Food Institute (PFI) appreciates the opportunity to provide comments regarding the proposed updates to the World Organization for Animal Health's (OIE's) Terrestrial Animal Health Code chapter on avian influenza as it relates to processed pet food. We request that the United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) consider incorporating our comments into the official United States comment to the OIE as an OIE member. PFI will also work with the Global Alliance of Pet Food Associations (GAPFA), of which PFI is a founding member (and which has a cooperative agreement with the OIE), to submit comments to the OIE in early January. We truly appreciate the opportunity to deliver these comments and to work with USDA APHIS to promote trade in safe pet foods.

Established in 1958, PFI is the trade association and the voice of U.S. cat and dog food manufacturers. Our 25 producer members account for approximately 98% of the dog and cat food made in the USA; selling more than \$29 billion in dog and cat food annually and exporting an additional \$1.4 billion. PFI also represents 65 associate members who supply ingredients and raw materials to dog and cat food producers. We are proud of our strategic alliance with the National Grain and Feed Association.

PFI members share USDA APHIS's commitment to facilitating trade in pet food products that are safe and comply with science- and evidence-based animal health and product safety requirements around the world. US pet food makers export pet food products to more than ninety countries and PFI members are proud of their commitment to promoting long and healthy lives for dogs and cats in the United States and around the world.

PFI appreciates the opportunity to share with USDA APHIS our comments on the work completed in September by the OIE's Terrestrial Animal Health Standards Commission (the Code

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Commission). PFI's International Trade Subcommittee has reviewed the proposed updates identified as Item 6.4, Infection with avian influenza viruses (Chapter 10.4) and we are encouraged by the Code Commission's recommendation to recognize that processing methods used to make many pet foods effectively inactivate AI viruses, and should be so recognized by OIE members.

General comment and observations:

PFI notes with appreciation the following proposed language:

A notification of infection with influenza A viruses of high pathogenicity in birds other than poultry, including wild birds, or of low pathogenicity avian influenza viruses in poultry does not affect the status of the country or zone. A Member Country should not impose bans on the trade in poultry and poultry commodities in response to such notification, or to other information on the presence of any influenza A virus in birds other than poultry, including wild birds.

PFI believes this proposed language is consistent with the recognition by animal health experts around the world that detections of influenza A viruses in birds other than poultry, or of low pathogenicity AI viruses in poultry, do not warrant restrictions on trade in products containing poultry, including processed pet food.

PFI is also very pleased that the proposed language under the Safe Commodities section (Article 10.4.1 bis) stipulates that:

"Veterinary Authorities should not require any avian influenza-related conditions, regardless of the avian influenza status of the exporting country or zone:

1) heat-treated poultry meat in a hermetically sealed container with a F-value of 3.00 or above:

2) extruded dry pet food and poultry-based coated ingredients after extrusion:

3) rendered meat and bone meal, blood meal, feather meal, and poultryvoil:

4) feathers and down from poultry and other birds processed by washing and steam-drying.

Other commodities of poultry and other birds can be traded safely if in accordance with the relevant articles of this chapter.

This proposed language acknowledges that extruded dry pet food and poultry-based ingredients after extrusion, as well as rendered ingredients from poultry, are safe to trade due to the processing they undergo, with time and temperature parameters that ensure the inactivation of AI viruses.

We have one observation we would like USDA APHIS to consider. We note the absence in the Safe Commodities list of pet food that is heat-treated in a hermetically sealed container with an F-value of 3.00 or above. We understand the OIE definitions of *poultry* and *meat*, taken together, include poultry ingredients used in pet food that is heat-treated in a hermetically sealed container with an F-value of 3.00 or above, but we believe a specific reference to such pet food in the list of Safe Commodities would remove doubt and reduce the likelihood of an unnecessary trade disruption. Accordingly, we request that USDA APHIS consider proposing the following change to OIE:

- 1) heat-treated poultry meat and pet food in a hermetically sealed container with a F-value of 3.00 or above:

We believe the addition of a reference to thermally processed pet food in hermetically sealed containers will provide clarity to all OIE members and facilitate trade in safe pet foods, so we request that USDA APHIS consider proposing this change.

Conclusion:

PFI thanks USDA APHIS for your willingness to consider incorporating our comments into the official United States submission to the OIE. We stand ready to provide any assistance or information you need in order to convey our points to the OIE. We will also work closely through GAPFA, leveraging its cooperative agreement with OIE, to share our comments by the 14 January deadline stipulated by the Code Commission.

Thanks also to you and your APHIS colleagues for your hard work on behalf of US pet food makers. We truly value and appreciate APHIS' efforts to facilitate exports of US pet food products.

Happy holidays to you and your family.

Sincerely,



Peter Tabor
Vice President, Regulatory & International Affairs