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Tuesday, 20 February 2018

The European Commission Directorate-General for Health and Food Safety

RE: Feedback Regarding SANTE/7008/2017 CIS Rev. 3

Dear Sir or Madam:

The Pet Food Institute (PFI), which represents the US makers of dog and cat food and accounts for approximately 98 percent of US dog and cat food manufacturing, wishes to echo the comments submitted by the United States Department of Agriculture's Animal and Plant Health Inspection Service (APHIS), in response to the EU's proposed amendments to Regulations 999/2001 and 142/2011.

PFI agrees wholeheartedly with the comment submitted by APHIS. Specifically, we believe:

- More time is required to ensure a complete understanding of any new requirements. A full year is essential to this process, in order to ensure the smooth transition to any new system for trade in animals and animal by-products.
- Changes are required to ensure that certain proposed language, identified by APHIS in its comment, does not cause confusion and different interpretations among Member States.
- Proposed changes to import requirements for pet food threaten the limited access US pet food and pet ingredient makers have. The current arrangement, which allows processed pet food ingredients to enter the EU accompanied by the (3E) certificate for flavoring innards (as opposed to having to meet requirements for livestock feed ingredients), is based on a longstanding agreement that the Commission has acknowledged is appropriate for pet food and pet food ingredients. We urge the EU to reconsider this proposed change and/or provide science-based justification for it.
- The proposed amendments do not fully recognize nor take into account the extraordinary steps both US regulators (APHIS and the US Food and Drug Administration) have taken over two-plus decades to ensure the safety of US animal food, with particular attention paid to eliminating the opportunities for the introduction of bovine spongiform encephalopathy into ingredients or finished foods.

The members of PFI take their commitment to product safety very seriously – safety is considered pre-competitive among our members in order that we may advance the understanding of and improve overall product safety. To that end, we rely on regulators around the world to base their regulations on science and we urge the EU to ensure its proposed amendments are science- and risk-based, in order to facilitate trade in safe foods.

We trust that the EU, in finalizing these amendments, will take our comment and that of APHIS and other stakeholders into account.

Sincerely,



Peter Tabor

Vice President, Regulatory & International Affairs

