

Thursday, August 30, 2018

US Department of Agriculture
Food Safety and Inspection Service
Docket number: FSIS-2016-0032

Dear Sir or Madam:

The Pet Food Institute (PFI) appreciates the opportunity to provide comments regarding the US Department of Agriculture (USDA's) Food Safety and Inspection Service (FSIS) proposed rule titled Preparation of Uninspected Products Outside of the Hours of Inspectional Supervision, published in the Federal Register on July 31, 2018 and hereafter referred to as the FSIS proposed rule.

Established in 1958, PFI is the trade association and the voice of U.S. cat and dog food manufacturers. Our 24 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 also proud of our strategic alliance with the National Grain and Feed Association.

PFI members and their products are subject to regulatory oversight by both the US Food and Drug Administration (FDA) and state departments of agriculture or health. We are committed to pet food safety and quality, and we are proud of the strong safety record of pet food. PFI strongly supports the objectives of the Food Safety Modernization Act (FSMA) and we are leading the industry effort to promote compliance with this landmark law and its implementing regulations, including the Preventive Controls for Animal Food (PCAF) rule.

We have one general comment to share with FSIS regarding its proposed rule and that is to urge FSIS to work closely with FDA and with the facilities impacted by this proposed rule to ensure all facilities under FSIS regulatory oversight for the production of human food are aware of and meet their obligations under the FSMA PCAF rule.

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PFI understands the rationale behind the FSIS proposed rule is to “eliminate prescriptive requirements governing the manufacture of uninspected products, such as pet food, in edible product areas of official establishments and to allow official establishments to manufacture such products outside the hours of operation.” FSIS’ principal concern as we understand it is the safe manufacture of foods under its regulatory purview.

The principal concern of PFI is that all makers of pet food products (including ingredients used in pet food products), regardless of the premises in which these products are manufactured, are aware of their obligations under applicable FDA regulations, specifically the FSMA PCAF rule. We therefore urge FSIS, as it proceeds to finalize this rule, to: ensure that FDA is aware of the changing circumstances with respect to pet food products manufactured in FSIS-regulated facilities; and to convey to the affected facilities that their manufacture of pet food products and ingredients was and continues to be subject to FDA regulatory oversight.

We believe that if FSIS takes these steps as part of its finalization of this rule, it will provide greater regulatory certainty and also promote awareness of the regulations applicable to the manufacture of pet food products and ingredients.

PFI thanks FSIS for this opportunity to comment on this proposed rule as it relates to the production of pet food in edible product areas of official establishments. Our mission is to promote long and healthy lives for dogs and cats and we believe that the manufacture of safe pet food products is integral to that mission. We stand ready to work with FSIS to advance the shared effort to improve product safety, for the benefit of dogs, cats and their owners.

Sincerely,

A handwritten signature in black ink that reads "Dana Brooks". The signature is written in a cursive, flowing style.

Dana Brooks
President & CEO