

November 2, 2020

Dr. Steven Solomon
Director, Center for Veterinary Medicine
U.S. Food and Drug Administration
HFV-1
7500 Standish Place
Rockville, MD 20855

Dear Dr. Solomon:

As the trade association representing U.S. cat and dog food makers, the Pet Food Institute (PFI) and our members recognize and take seriously our commitment to producing the safest food possible for pets, both domestically and internationally. Critical to that mission is the animal food ingredient review and approval process.

As you well know, Congress provided \$5 million in Fiscal Year (FY) 2020 appropriations to fully staff the feed ingredient review teams at the U.S. Food and Drug Administration (FDA) Center for Veterinary Medicine (CVM). This funding was established in order to reduce the delay and expense animal food manufacturers experience as they innovate to address pressing health, nutrition, and sustainability challenges and opportunities. With these new funds, we understand that CVM was able to hire additional staff members.

With the likelihood of Congress passing a Continuing Resolution expected to include \$5 million in funding for FY21, PFI urges FDA CVM to consider devoting new resources to the following the key areas related to product innovation and consumer awareness.

- Although improvements may be seen in devoting more personnel to the federal processes for bringing new ingredients to market (i.e. Food Additive Petition, GRAS process etc.), we encourage resources be dedicated to actively working with the Association of American Feed Control Officials (AAFCO) Ingredient Definition Committee. This work with AAFCO will help to modify and modernize certain existing definitions into terms that are more relatable to today's consumer and are more appropriate for products found on grocery store shelves instead of those currently used in the animal agriculture/animal feed trade.
- There are often delays in approval of certain product claims which must receive pre-approval from FDA CVM. Specifically, FDA CVM review of urinary tract health claims and hairball claims take an inordinate amount of time. We urge FDA CVM to devote resources to facilitate faster review of such product claims, which would result in greater consumer choice and understanding regarding products that can promote pet health and well-being.

PFI will continue supporting efforts to ensure CVM has sufficient resources and personnel to effectively and efficiently conduct new ingredient reviews, which should in turn expand consumer choice and increase U.S. pet food makers' global competitiveness.

We look forward to continuing our partnership with CVM to expedite the ingredient review and approval process while putting food safety at the forefront of our discussions. If you have questions, you may reach PFI's Pat Tovey, Director of Technology and Regulatory Compliance, at pat@petfoodinstitute.org.

Thank you,



Dana Brooks
Pet Food Institute
President and CEO