



March 15, 2021

The Honorable Tammy Baldwin
Chair, Subcommittee on Agriculture, Rural Development,
Food and Drug Administration and Related Agencies
Committee on Appropriations
129 Dirksen Senate Office Building
Washington, DC 20510

The Honorable John Hoeven
Ranking Member, Subcommittee on Agriculture, Rural Development,
Food and Drug Administration and Related Agencies
Committee on Appropriations
125 Hart Senate Office Building
Washington, DC 20510

Dear Chair Baldwin, Ranking Member Hoeven, and Members of the Subcommittee:

Members of the American Feed Industry Association (AFIA), National Feed and Grain Association (NGFA), and the Pet Food Institute (PFI) feed pets and livestock across the nation and world, and work to ensure the health and safety of those animals daily. Critical to that mission is the animal food ingredient review and approval process. We appreciate your dedication to ensuring the Center for Veterinary Medicine (CVM) at the U.S. Food and Drug Administration (FDA) has the necessary resources to complete timely animal food ingredient reviews.

The animal food industry is experiencing significant challenges with the animal food ingredient review and approval process at the CVM. A study, performed by Informa Economics, found that on average it takes three-to-five years to get an ingredient reviewed by the CVM. In that time, U.S. animal food companies lose an average \$1.75 million annually in revenue. The resulting delay and expense stifle the ability to innovate and to address some of the most pressing health and nutrition challenges and opportunities in the animal industry. Left unchecked, this ultimately reduces choices in the marketplace, especially for farmers, ranchers, and consumers looking for innovative ingredients for the health and safety of their animals.

In FY21 this subcommittee provided \$5,000,000 in appropriations directed at addressing this issue, which we greatly appreciate. However, there is a significant need for more resources at the CVM to fully staff the animal food ingredient review teams. **We respectfully request that Congress rectify the lack of resources creating onerous time and cost restraints by appropriating \$10,000,000 for CVM for FY22, specifically for hiring more staff, improving infrastructure, and providing IT assistance to conduct animal food ingredient reviews.**

We also request when appropriating this funding the accompanying report language instruct CVM to use the additional resources to:

- Improve the ingredient review and approval process, and enhance the uniform acceptance of animal food ingredients by delegated authorities across the nation through increased participation in Association of American Feed Control Officials (AAFCO).
- Modernize the Center for Veterinary Medicine Policy and Procedures Manual Guide 1240.3605, which has not been updated since 1998 and has not kept pace with science. The CVM Guide prohibits manufacturers of animal food ingredients from making certain marketing claims about

the product's use because the Guide's outdated policy interpretation classifies the claim to be associated with an animal drug. Current science shows that animal nutrition and animal food ingredients impact animal production, animal health, food safety, and the environment. Research has shown that some animal food ingredients can reduce greenhouse gas emissions and improve health and wellbeing of animals. Access to these ingredients will ensure U.S. producers continue to be global leaders in sustainability, improve animal health, and provide food safety solutions.

Overall, this appropriation would enable enhancements to CVM's ingredient review and approval teams, amplifying competitiveness of U.S. animal food on a global scale.

We greatly appreciate your consideration of this appropriation request. If you have questions, please reach out to Atalie Ebersole, PFI's director of government relations, at atalie@petfoodinstitute.org, Bobby Frederick, NGFA's vice president of legislative affairs and public policy, at bfrederick@ngfa.org, or Leah Wilkinson, AFIA's vice president of public policy and education, at LWilkinson@afia.org.

Thank you,



Constance Cullman
American Feed Industry Association
President and CEO



Michael Seyfert
National Grain and Feed Association
President and CEO



Dana Brooks
Pet Food Institute
President and CEO