

December 9, 2024

Ms. Lisa Slimmer  
Regulatory Analysis and Development  
USDA APHIS Policy and Program Development  
Station 3A-03.8  
4700 River Road  
Riverdale, MD 20737-1238

Docket Number: APHIS-2023-0058

Dear Ms. Slimmer,

The Pet Food Institute (PFI) appreciates the opportunity to provide comments on the notice published by the U.S. Department of Agriculture Animal and Plant Health Inspection Service (APHIS) announcing its proposed adjusted user fee rates for the costs of providing certain goods and services, including veterinary diagnostic goods and services and veterinary services for imports and exports of live animals and animal products.

Established in 1958, PFI is the trade association representing U.S. cat and dog food manufacturers providing complete and balanced nutrition for the dogs and cats in 82 million U.S. households. Our members account for most of the dog and cat food made in the United States, with more than \$64 billion in domestic annual dog and cat food and treats sales and annual exports of more than \$2.4 billion. PFI's members collectively contribute to rural communities' vibrancy by employing over 35,000 people in 34 states.

Demand for U.S. pet food remains strong and importers continue to seek safe and nutritious pet food from the United States to meet growing demand in overseas markets. APHIS must be fully funded to provide timely, reliable, and consistent assistance to U.S. pet food exporters who rely on APHIS import and export services. PFI supports adjusting user fees to address the funding gap created by a decade without increases to account for the cost of providing these necessary services.

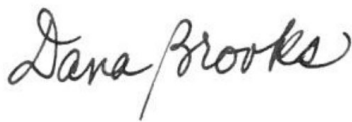
Pet food exporters have experienced the effects of this funding gap through delays in facility approvals or listings, leading to lost sales for U.S. companies and added strain on APHIS Veterinary Services (VS). While APHIS VS has done everything possible to alleviate the strain they experience, they must have more funding to implement the easiest solution to this problem: hiring more staff to perform these necessary services.

PFI supports the notice's recognition of IT improvements needed to alleviate delays resulting from periodic failures in APHIS VS, the antiquated email-based system for receiving industry

requests, and required documentation for facility inspections. However, PFI respectfully requests that APHIS consider providing service standards for the user fee activities listed in the annual fee notice to ensure consistency in services provided by APHIS VS.

PFI appreciates the opportunity to comment on this much-needed action to address the user fee issue at APHIS. We encourage APHIS to address the public comments swiftly and set an implementation date for the new user fees as soon as possible to alleviate the strain on APHIS VS and U.S. pet food exporters described in these comments.

Sincerely,



Dana Brooks  
President and CEO