

Rescinding National Organic Program; Market Development for Mushrooms and Pet Food

June 11, 2025

Submitted Electronically via Regulations.gov

U.S. Department of Agriculture (USDA) Agricultural Marketing Service (AMS)

Docket [AMS-NOP-22-0063]

Regulation Identifier Number [0581-AE13]

The Pet Food Institute (PFI) appreciates the opportunity to provide comments regarding USDA's May 12, 2025, notice for public input concerning "Rescinding National Organic Program; Market Development for Mushrooms and Pet Food."

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.

As the voice of American pet food makers, PFI advocates for a transparent, science-based regulatory environment that supports the domestic manufacture and global distribution of safe, nutritious, and high-quality pet food. As such we feel particularly well-situated and well-informed to share our industry's opinion on this important topic.

PFI was pleased when the final rule for "National Organic Program: Market Development for Mushrooms and Pet Food" was published in late December 2024. This rule and associated regulations supported pet food makers by establishing a standard to allow the use of the USDA Organic seal on the labels of finished pet food products. We agree with the Agricultural Marketing Service's belief that promoting the new standard would stimulate market development in the organic space and provide regulatory certainty to facilitate U.S. agricultural growth in this segment.

While annual sales of organic foods have grown from less than \$1 billion to over \$65 billion since the implementation of the National Organic Standards in 2002, organic pet food sales have lagged significantly behind. We believe the lack of an organic pet food standard has been the primary limiting factor inhibiting growth in this market.

We were disappointed to learn on May 12 that the USDA has introduced a proposed rule to rescind that progress.

Although the agency states revoking this standard would have a beneficial effect on small entities to lower costs related to paperwork burdens, we believe the opposite is true. From May 12, 2025, Federal Register notice proposing to rescind the organic pet food standards:

“This proposed rescission of the rule is expected to have a beneficial effect on these small entities, lowering costs related to paperwork burden and otherwise allowing operators and producers to continue to engage in beneficial and often industry-standard practices without additional regulatory costs.”

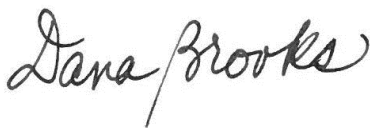
In point of fact, rescinding the new rule will be a step backwards by reintroducing a confusing and burdensome process that will continue to inhibit the growth of the organic pet food marketplace.

PFI members seek a more predictable and clearer regulatory pathway to conduct business. Due to the unique nutritional requirements of dogs and cats, pet food makers have long struggled to create and market products that provide sole source nutrition to pets while trying to follow human organic standards. Removing the ability to utilize the organic seal for food for dogs and cats will inhibit the ability of pet food manufacturers to innovate for the benefit of pets and pet parents alike. **In short, we urge the agency not to rescind the rules and regulations set forth in “National Organic Program: Market Development for Mushrooms and Pet Food” final rule.**

PFI understands that keeping the organic standards for pet food may not be the outcome. We recognize the agency must consider numerous factors in a decision of this nature, particularly items mentioned under Procedural Matters in the supplementary information section of the proposed rule. If USDA ultimately decides to rescind the final rule, PFI members respectfully request that our original comments be given serious consideration should the National Organic Program revisit the development of an Organic Pet Food standard in the future.

On behalf of PFI members we appreciate the opportunity to share our views.

Sincerely,



Dana Brooks
President and CEO Pet Food Institute