March 11, 2020

The Honorable John Hoeven  
Chairman, Subcommittee on Agriculture, Rural Development,  
Food and Drug Administration and Related Agencies  
Committee on Appropriations  
S-128, The Capitol  
Washington, DC 20510

The Honorable Jeff Merkley  
Ranking Member, Subcommittee on Agriculture, Rural Development,  
Food and Drug Administration and Related Agencies  
Committee on Appropriations  
190 Dirksen Senate Office Building  
Washington, DC 20510

Dear Chairman Hoeven, Ranking Member Merkley and Members of the Subcommittee:

The American Feed Industry Association (AFIA) 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 who are looking for innovative ingredients for the health and safety of their animals.

Some technical and legal issues surrounding the animal food ingredient review and approval process were resolved by the Animal Drug User Fee Act passed in 2018, and by this subcommittee providing $5,000,000 in FY20 appropriations 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 are asking that Congress rectify the lack of resources creating onerous time and cost restraints by appropriating $8,000,000 for the CVM for FY21, specifically for hiring more staff to conduct animal food ingredient reviews.** This appropriation would be an enhancement to the capability of the ingredient review and approval teams,
ensuring CVM has additional resources and personnel needed to expediently review new ingredients, amplifying competitiveness of U.S. animal food on a global scale.

We greatly appreciate your consideration of this appropriation, which will expedite the ingredient review and approval process without compromising human food or animal food safety. If you have questions, please reach out to Morgan Beach, PFI’s director of government relations, at morgan@petfoodinstitute.org or (660) 537-4845 and Cory Harris, AFIA’s manager of government affairs, at charris@afia.org or (703) 650-0147.

Thank you,

Constance Cullman
American Feed Industry Association
President and CEO

Dana Brooks
Pet Food Institute
President and CEO