

May 10, 2019

U.S. Department of Agriculture
Food Safety and Inspection Service
Docket No. FSIS-2018-0034

Submitted electronically via regulations.gov

Dear Sir or Madam:

The Pet Food Institute (PFI) appreciates the opportunity to provide comment regarding the guidelines given in the USDA Food Safety Inspection Service (FSIS or the agency) Industry Response to Consumer Complaints Guidance, published in the Federal Register on March 11, 2019.

Established in 1958, PFI is the trade association and voice of U.S. cat and dog food makers. Our member companies make 98% of the dog and cat food produced in the United States, with more than \$30 billion in domestic dog and cat food sales and an additional \$1.4 billion in international exports in 2018. PFI also represents more than 50 associate and affiliate members who supply ingredients, raw materials, equipment and related services to dog and cat food makers.

PFI shares the same commitment to food safety as FSIS, and we are proud of our members' track record in this regard. PFI supports safety- and science-based regulation like the Food Safety Modernization Act (FSMA) and works with pet food makers and regulatory bodies to successfully implement such laws.

PFI members commend the agency for issuing the recent guidance document (Industry Response to Consumer Complaints), which communicates best practices for meat and poultry producers to implement and follow when responding to consumer complaints.

Although this guidance document is written specifically for FSIS-regulated facilities and does not include pet food makers, PFI would like to suggest that the agency set the same expectation in applying these principles to the material that is intended for use in pet food.

Member companies of PFI have experienced numerous instances of foreign material contamination in pet food ingredients originating from FSIS-regulated establishments. We applaud the efforts of FSIS to improve the safety of human food ingredients produced at these facilities and would like to see consistent practices for the animal food ingredients that come from these same facilities. Prevention at the source is the most efficient and economical approach to eliminating potential adulteration for an otherwise high quality and sustainable source of nutrition for the U.S. pet population.

In order to avoid the unintended consequence of adulterated human food being redirected for use in pet food, FSIS Guidance should not allow or condone downgraded human food material that presents a health or safety risk due to foreign material inclusion to be diverted to a by-product stream for use in pet food. Implementing these practices across both human and animal food ingredients will offer a significant improvement throughout the entire supply chain, benefiting both people and pets.

In addition, PFI feels the Guidance document will benefit by including clear statements regarding the role of the U.S. Food and Drug Administration (FDA) in regulating animal food. Specifically, by reminding meat and poultry producers that any human food by-products, including adulterated human food processed at these facilities, is subject to FDA regulation under FSMA once it leaves the facility.

Again, PFI appreciates the opportunity to comment on this Draft Guidance and we thank you for your consideration of our input, which is submitted with the intent of improving food safety across the entire food supply.

Sincerely,



Dana Brooks
President & CEO
Pet Food Institute