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PET FOOD INSTITUTE

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**Remarks by Randy Gordon, National Grain and Feed Association,
on behalf of the Pet Food Institute**

October 30, 2001, Food & Drug Administration Hearing

I am speaking today on behalf of the Pet Food Institute, the trade association that represents the manufacturers of 95 percent of the dog and cat food sold in the United States. The Pet Food Institute was unable to have a representative present at today's hearing because it coincided with their board of directors and annual industry meeting in Chicago. The National Grain and Feed Association and the Pet Food Institute have developed a strategic alliance to work together on issues of mutual interest between our different industries. It is under that arrangement that I offer the following comments on behalf of the Pet Food Institute to the Agency's questions under consideration.

The Pet Food Institute and the pet food industry has and continues to support the government's efforts to prevent the introduction of BSE into the United States and the safeguards that are in place. We agree that the need for a cautionary statement on pet food sold at retail has already been addressed by the Agency and does not need to be considered again.

In January 1997, the FDA proposed a cautionary label on pet food sold at the retail level as a part of its efforts to prevent the amplification of the BSE disease-causing agent should it ever be found in the United States. FDA, in its final Federal Register notice later that year, agreed that a label on pet food sold at retail was not needed. The Agency noted, "FDA agrees that the cautionary statement serves no useful purpose on pet food. . . These products typically cost substantially more per ton than most complete feeds

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intended for food-producing animals. Therefore, there is little, if any, risk that pet foods . . . will be purchased at full price for use in ruminant rations.”

As was the case in 1997, under a cautionary labeling scheme, pet foods would be the only retail products to carry a precautionary statement on the label. As the research the Pet Food Institute previously presented indicated, such a label would have not only a negative effect on pet food by unnecessarily alarming consumers, it would also have a negative impact on human foods. Our research found that 71 percent of consumers would buy something else if they saw such a label on pet food; 68 percent would be very concerned about the safety of the pet food if it carried such a label; and, 40 percent of the respondents would be very concerned about consuming beef and lamb because of the label on pet food products.

Since, as the Agency correctly points out, dog and cat food sold at retail is neither designed nor priced to serve as ruminant feed, the necessity for such a label at the retail level is further decreased. Salvage and distressed pet food, as is currently required, should continue to carry the label “Do not feed to cattle or other ruminants” and the industry recognizes its responsibility to ensure such materials are handled in compliance with the regulation when used in animal feed. The Pet Food Institute has taken a number of steps to remind its members, other organizations, and state government officials of the importance of complying with the salvage and distressed pet food labeling regulations and will continue its efforts to prevent these products from being included in ruminant feed. We believe the proper enforcement of the current labeling regulation is the best method to prevent the inclusion of salvage and distressed pet food in ruminant feed.

In conclusion, the Pet Food Institute, on behalf of its member companies, believes the Agency was correct in 1997 that a cautionary statement on retail pet food products was not necessary. The efforts to prevent BSE from entering the United States have been successful since the 1997 rule was issued. A cautionary statement on pet food products is not warranted and the current regulation should not be amended.