

To:

**Dockets Management Staff (HFA-305),
RE: FDA Enforcement Policy for AAFCO-Defined Animal Feed Ingredients,
Food and Drug Administration,
5630 Fishers Lane, Rm. 1061, Rockville, MD 20852.**

Dear Ms. Forfa and team,

Re: **Docket No. FDA-2024-D-2977**
Comment Category: Animal Feed Industry C0007

On [August 2](#), we were cautiously pleased to see that the Food and Drug Administration, (FDA), announced it was *ending* their 17 year Memorandum of Understanding with the Association of American Feed Control Officials, (AAFCO), the body charged with setting standards for pet foods in the United States. Under AAFCO's guidance, albeit under the FDA's supervision, the pet food industry has been allowed to include an array of ingredients that are completely unacceptable including: dust, chaff, and cattle, swine and chicken feces, as well hair and feathers. We also note with dismay that plastic is also getting into pet food and animal feed through routes such as these:

- Polyethylene roughage replacement: [polyethylene](#) is a plastic that is typically used to make grocery bags. It is listed by AAFCO as an acceptable fiber in animal feed.
- [Restaurant waste](#) is used in pet food with no guarantee that plastic packaging and detritus is removed from it beforehand.
- Carcass heads all have plastic identity tags on them, which are ground into our pet's food, unless they are specifically removed. Which we suspect is highly unlikely.

All the above impact pet and animal health which is why we want to these meaningful and binding changes, now that AAFCO has been removed from the process:

1. We demand that feces and dust; restaurant waste and polyethylene roughage replacement are banned from all pet food and animal feed with a *binding* agreement. We must stop using pet food as a dumping ground for agricultural and human food waste.
2. We demand that it becomes a legal obligation for all carcass identity tags to be removed before they are used in pet and animal feed. This requires the industry to take additional measures and for the FDA to carry out on the ground spot checks at manufacturing and rendering plants and spot testing of pet food, to determine exactly what is in our pets' food.
3. We demand that the FDA implements a legally binding and rigorous system of regulating pet and animal food across the board which would see unannounced inspections at pet food and animal feed factories, as well as meat rendering plants.
4. We demand effective punitive measures be taken when the industry is found to be breaking these new rules, with a system of escalating fines and actions on repeat offenders.
5. We demand that the pet food industry be banned from using misleading images and descriptions on their pet food packaging, for example showing prime cuts of meats, when these have not been used in their pet food products.
6. We demand that the pet food industry is banned from making medicinal claims about their products unless substantiated by FDA approved scientific research.
7. We note as well that the FDA has done nothing to limit the use of the plastic chemicals, [Polyvinyl Chloride \(PVC\)](#) and [Bisphenol-A \(BPA\)](#), which are used as coating to line the inside of the majority of pet food cans. We ask that the FDA take action to see this practice phased out.
8. If the FDA is unable or unwilling to make these changes then we demand that the regulation of pet food falls under the jurisdiction of the United States Department of Agriculture (USDA).

At this time the pet food industry, worth a staggering \$340 Billion, is heavily promoting the passing of the [Purr Bill](#), which would see an end to all state regulation of pet food. It would also allow the pet food industry

to make unsubstantiated medical claims about pet food and pet food treats, for example that they are good for tartar control. We recognize this for what it is - a cynical attempt by this powerful lobby to sidestep meaningful and binding regulation, to protect their profits. This is potentially putting our pets' health and wellbeing at risk. We demand that the FDA support all attempts to see this Bill fail and offer objections to it.

Our pets have no voice, we speak for them because we know that the pet food lobby is not their advocate and so far, your department, the FDA's Center for Veterinary Medicine, (CVM) has given us no indication that they put the health and wellbeing of pets, first either. The FDA needs to stop pandering to the pet food industry that consistently puts profit above all else.

No animal should be eating feces or plastics and if the FDA believes that these are scientifically nutritious ingredients, we demand to see their scientific evidence that backs this belief up.

Yours sincerely,

NAME:

ADDRESS (OPTIONAL):

DATE: