

National Organic Program; Market Development for Mushrooms and Pet Food

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

Docket [AMS-NOP-22-0063]

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The Pet Food Institute (PFI) appreciates the opportunity to provide comments regarding the USDA's March 11, 2024, request for public input concerning establishment and clarification of specific standards for organic mushrooms and organic pet food.

Established in 1958, PFI is the trade association and the voice of U.S. cat and dog food manufacturers. Our members account for the vast majority of the pet food and treats made in the United States, with more than \$60 billion in domestic annual dog and cat food and treats sales and annual exports of more than \$2.4 billion. PFI membership also includes companies that supply ingredients, equipment, and services to dog and cat food makers. We are all proud to be feeding over 186 million dogs and cats in U.S. households.

PFI strongly supports the establishment of a standard to specifically allow the use of the USDA Organic seal on pet food products. We agree with the Agricultural Marketing Service that promulgation of this rule will promote market development by increasing regulatory certainty that will consequently encourage investment in this segment.

Overall, we are pleased with the language in the proposed USDA rules for organic pet food. We do, however, want to point out that the proposed rules only list Taurine when discussing amino acids allowable on the National List. Our singular notable comment is a request for the National Organic Standards Board to consider expanding the allowable amino acids to include others that are necessary for dogs and cats. In considering this request, please keep in mind that pets eating commercial diets rely on pet food makers to provide all the necessary and essential nutrients to be present in the correct amounts in their daily feedings since those are the sole source of nutrients for the pet.

To allow pet food manufacturers to meet the nutritional profiles listed in the Association of American Feed Control Officials' *Official Publication* we suggest broadening the scope of allowed amino acids on the National List to align with existing trace mineral and vitamin entries

(7 CFR 205.603 (d) (2-3)). We propose replacing the suggested addition to 7 CFR 205.605(b) for Taurine with “Amino acids, used for enrichment or fortification when FDA approved – for use only in pet food”.

On behalf of PFI members, which include over 35,000 employees across 35 states providing safe food for 186 million U.S. pets, we appreciate the opportunity to share our views. We look forward to an outcome from this proposal that will allow for the safe and informed use of the Organic Seal on dog and cat food labels.

Sincerely,



Dana Brooks
President and CEO Pet Food Institute