



National Grain
and Feed Association
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March 24, 2023

The Honorable Martin Heinrich
Chair, Subcommittee on Agriculture, Rural Development,
Food and Drug Administration and Related Agencies
Committee on Appropriations
129 Dirksen Senate Office Building
Washington, DC 20510

The Honorable John Hoeven
Ranking Member, Subcommittee on Agriculture, Rural Development,
Food and Drug Administration and Related Agencies
Committee on Appropriations
125 Hart Senate Office Building
Washington, DC 20510

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

Members of the American Feed Industry Association (AFIA), National Grain and Feed Association (NGFA), North American Renderers Association (NARA) 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 has experienced 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 looking for innovative ingredients for the health and safety of their animals.

In FY23, \$8,000,000 in appropriations was directed in the House passed bill to address this issue, which we greatly appreciate. However, no money was appropriated via the omnibus package. There is still a significant need for additional resources at the CVM to fully staff the animal food ingredient review teams and address the backlog of approving critical animal food ingredients. We believe that a total of \$10 million is needed to fully staff the animal food ingredient review team and we **respectfully request that Congress rectify the lack of resources creating onerous time and cost restraints by appropriating \$5,000,000 for CVM for FY24, specifically for hiring more staff, improving infrastructure, and providing IT assistance to conduct animal food ingredient reviews.** This phased-in approach to funding will allow the CVM to hire and train the staff in a manageable manner.

Our nation's entire food system has faced incredible disruptions. U.S. agriculture and American consumers have experienced first-hand the impacts of rising costs, transportation and labor challenges and the availability of ingredients and finished products. Our organizations are working together to ask Congress and the Biden Administration to create sound policies that will help reduce the vulnerability for all of food and agriculture in the future. Overall, this appropriation would enable enhancements to CVM's ingredient review and approval teams, amplifying competitiveness of U.S. animal food on a global scale.

We greatly appreciate your consideration of this appropriation request to improve CVM's ingredient review process. If you have questions, please reach out to Leah Wilkinson, AFIA's Vice President of Public Policy and Education, at lwilkinson@afia.org; Stephanie See, NGFA's Vice President of Legislative and Public Affairs, at ssee@ngfa.org; Charles Starkey, NARA's Vice President of Regulatory and Scientific Affairs, at cstarkey@nara.org or Atalie Ebersole, PFI's Senior Director of Government Relations, at atalie@petfoodinstitute.org.

Thank you,



Constance Cullman
American Feed Industry Association
President and CEO



Michael Seyfert
National Grain and Feed Association
President and CEO



Kent Swisher
North American Renderers Association
President and CEO



Dana Brooks
Pet Food Institute
President and CEO