

Bernadette Dunham, D.V.M, Ph.D.
Director, Center for Veterinary Medicine
Food & Drug Administration
7519 Standish Place
Rockville, MD 20855

Via Electronic Mail

**RE: Feed/Pet Food Industry Supported Draft Guidance for Industry (GFI),
“Selecting Suppliers of Safe Ingredients for Animal Food”**

Dear Dr. Dunham:

Thank you for meeting with a delegation of our five organizations May 15th to discuss the attached document. We were pleased with the reception we received and comments offered.

We wish to respond to some suggestions offered to the draft GFI we presented, in particular, some comparisons of the draft GFI to the Grocery Manufacturers Association’s (GMA) Best Management Practices document. We believe the GMA document is similar to a number of our feed industry programs and assure you the GFI draft we presented was to represent only a small portion of our separate quality and feed safety guideline programs. It was not intended to address all aspects of our businesses. Instead, the segment addressed, selecting ingredient suppliers, was directly related to recent adulteration events in our collective industries.

We believe this document provides FDA the basis for providing to the industry-at-large its “current thinking” on ingredient supplier selection and only that topic. We realize CVM is drafting more comprehensive process control regulations under the Animal Feed Safety System. However, given the recent events, we believe FDA should more quickly issue this guidance to the industry while the AFSS program evolves.

Again, thank you for your meeting with us, and we hope you find the document useful and that you will consider issuing it as soon as is practical. If you have questions or comments please don’t hesitate to contact one or all of us.

Sincerely,

American Feed Industry Association, Joel Newman (jnewman@afia.org)
National Grain and Feed Association, Randy Gordon (rgordon@ngfa.org)
National Oilseed Processors Association, David Ailor (dailor@nopa.org)
National Renderers Association, David Meeker (dmeeker@renderers.org)
Pet Food Institute, Nancy Cook (nancy@petfoodinstitute.org)

c: Dr. Randy Lutter, FDA
Dr. Dan McChesney, CVM/FDA