



Dockets Management Staff (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

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The American Feed Industry Association (AFIA), based in Arlington, Va., is the world's largest organization devoted exclusively to representing the business, legislative and regulatory interests of the U.S. animal food industry and its suppliers. Founded in 1909 as the American Feed Manufacturers Association, the name changed to the American Feed Industry Association in 1985 to recognize the importance of all types of companies involved in the feed manufacturing industry—from manufacturers of commercial and integrated feed and pet food to ingredient suppliers to equipment manufacturers. AFIA is also recognized as the leader on international industry developments, representing the industry at global forums, including within the International Feed Industry Federation.

AFIA's members include more than 680 domestic and international companies, such as livestock feed and pet food manufacturers, integrators, pharmaceutical companies, ingredient suppliers, equipment manufacturers and supply companies that provide other products or services to feed manufacturers. Several state, national and regional associations are also AFIA members.

The feed industry plays a critical role in the production of healthy, wholesome meat, milk, fish and eggs and supports policies that uphold U.S. food and feed safety, ensure the proper nutrition of animals and protect the environment. More than 75 percent of the feed in the United States is manufactured by AFIA members. AFIA's members also manufacture approximately 70 percent of the country's non-grain ingredients, including soybean meal, distillers' co-products, vitamins, minerals, amino acids, yeast products and other miscellaneous and specialty ingredients.

AFIA supports the Food and Drug Administration's (FDA) vision outlined in the Blueprint for a New Era of Smarter Food Safety. Our members recognize the value of the goals stated in the document to optimize the use of technology to reduce the time it takes to track the origin of contaminated food, increase traceability in the food system, adapt to new business models such as food delivered through e-commerce and promote of the role of food safety culture on farms and in facilities.

Of particular interest to the animal food sector is the proposed FDA project to leverage the use of Artificial Intelligence and machine learning to explore new ways to enhance review of imported foods at ports of entry to ensure they meet U.S. food safety standards. Access to ingredients manufactured in foreign countries is essential for the animal food industry. AFIA supports applying the best predictive and analytical tools will help ensure the most significant food safety risks are being targeted for imported animal food ingredients.

*Our Industry. Our Passion. Our Voice.*

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AFIA is concerned about unintended consequences brought about by the requirement to adopt emerging technology for use in food tracking and traceability. Many animal feed manufacturers and ingredient suppliers are world leaders in the adoption of technology to support the most modern advances in food safety management and food traceability. FDA needs to allow time for all facets of the food system to improve the deployment of what are still largely novel technologies for the public sector. Requiring businesses to adopt the use of blockchain databases, Internet of Technology (IoT) networks, artificial intelligence, machine learning systems, and other developments while they are still developing internal systems to address the requirements of the Food Safety Modernization Act will place an undue burden on the businesses that manufacture animal food.

As heard during the public comments at the October 21 meeting in Rockville, Md., several food businesses have already developed traceability systems in partnership with modern technology companies in the face of mounting consumer demands for transparency in the food chain. But many more businesses, who are fully FSMA compliant, have not yet invested in supply chain automation or capital-intensive systems for traceability. The potential for government mandated implementation of emerging technology will create unwarranted economic drains and take resources away from adoption of new systems that directly impact the production of safe and wholesome food.

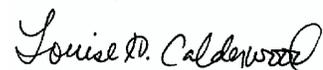
AFIA urges FDA to temper its enthusiasm to embrace new technology with the reality of current communication infrastructure in the U.S. Not all animal food manufacturers in rural areas have access to reliable cell service or high-speed internet. There are currently immense changes in the development of software and hardware systems used to manage tracking data for food manufacturing and distribution. Requiring adoption of the use of emerging technology may place an undue burden on the businesses that manufacture animal food, especially if upgrades will be required due to on-going rapid developments in information management systems.

Implementation of technology is vital to the future of the animal food production sector and is critical for managing the industry supply chain and verifying end-to-end compliance with FSMA. In order to stay competitive in the age of digitization and transparency, animal food producers and manufacturers of all sizes must implement the right tracking solution for their businesses to ensure safety and consistent quality. FDA can play an appropriate role in identifying emerging global technology to support businesses in adoption of new systems. Mandating acceptance of new systems will stifle creativity and inventiveness in one of the most innovative sectors of the U.S. economy.

AFIA urges the agency to extend its flexibility rationale as it continues to develop this exciting new approach to food safety management. Companies will have many ways of reaching the same goal of animal food safety and should be allowed to use a variety of approaches.

AFIA appreciates the opportunity to comment on the Blueprint for a New Era of Smarter Food Safety. We may make additional comments in the future as the practical nature of document continues to develop and we more fully understand the potential for impact on our members.

Sincerely,



Louise H. Calderwood  
Director of Regulatory Affairs