



According to sales statistics from PetFoodIndustry.com, the world's top ten pet food manufacturers are:

THE WORLD'S TOP 10 PET FOOD COMPANIES

Company	Country	Annual Revenue (in millions)
Nestlé Purina PetCare	United States	\$21,470.00
Mars Petcare Inc.	United States	\$20,000.00
Hill's Pet Nutrition	United States	\$3,780.00
General Mills	United States	\$2,500.00
Diamond Pet Foods	United States	\$1,500.00
J.M. Smucker	United States	\$1,500.00
United Petfood	Belgium	\$1,300.00
Simmons Pet Food	United States	\$1,200.00
Spectrum Brands / United Pet Group	United States	\$1,139.00
Unicharm Corp.	Japan	\$920.00

Source: <https://www.petfoodindustry.com/top-pet-food-companies>

Based on the statistics above, two companies take an estimated 70% of the pet food market share; Purina Petcare and Mars Petcare.

Mars Petcare owns multiple pet care businesses in multiple areas of pet care. Mars currently owns:

Veterinary and Diagnostic Services: Mars Veterinary Health, AniCura, Antech, Asia Veterinary Diagnostics, Banfield Pet Hospital, Blue Pearl, Heska Veterinary Diagnostics, Linnaeus, Mount Pleasant Veterinary Group, VCA Animal Hospitals, Veterinary Emergency & Specialty Hospital, Veterinary Specialty Hospital.

Pet Nutrition and Therapeutic Health Services: Acana, API, Aquarian, Buckeye Nutrition, Catsan, Cesar, Chappie, Crave, Dreamies, Eukanuba, Greenies, Iams, James Wellbeloved, Kitekat, Lovebug, Misfits, My Cat DNA, My Dog DNA, Natusan, NomNom, Nutro, Orijen, Peawee, Pedigree, Perfect Fit, Royal Canin, Sheba, Spillers, Temptations, Thomas, Whiskas, Winergy.

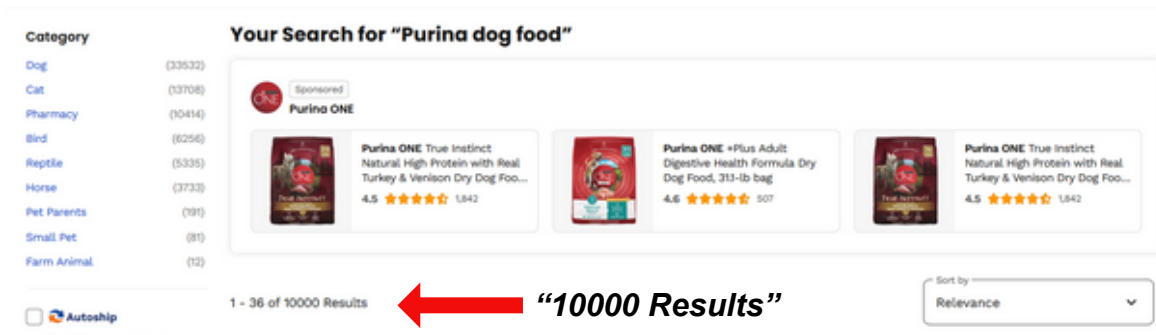
Innovation and Technology for Pets: Companion Fund, FluffyGo, Kinship, Leap Venture Studio, Pet Insight Project, Vet Insight, Waltham Petcare Science Institute, Whistle, Wisdom Panel.

Source: <https://www.mars.com/made-by-mars/petcare>

Purina Petcare owns a similar large number of pet food brands; Alpo, Beggin, Beneful, Beyond, Busy Bone, Dentalife, Fancy Feast, Friskies, Kit & Kaboodle, Moist & Meaty, Purina Cat & Dog Chow, Purina One, Purina Pro Plan, Purina Pro Plan Veterinary Diets, Whisker Lickin's. One brand alone - Purina Pro Plan manufactures "more than 175 pet food formulas." The Purina Pro Plan website provides 227 total Pro Plan pet foods.

Source: <https://www.purina.com/pro-plan/products>

Many individual pet foods within the various brands owned by both Mars and Purina are extremely similar, appearing to have only slight differences potentially to control more retail shelf space. The online pet retailer Chewy.com appears to offer 10,000 Purina dog food options.



Source: <https://www.chewy.com/s?query=Purina%20dog%20food&nav-submit-button=>

As well, these two manufacturers of pet food are leading members of the industry trade association Pet Food Institute. Currently, with the assistance of members of Congress, the Pet Food Institute has introduced a concerning bill that would dramatically change pet food regulation. The bill - known as the Purr Act - would allow pet foods to include ingredients not listed in the ingredient panel (on the label), and would allow unqualified claims on pet food labels without concern of mislabeling. Quotes from the PURR Act:

"Pet food shall not be treated as misbranded by reason of stating in the pet food ingredient list on the product label that an ingredient of a type described in paragraph (2) is sometimes, but not always, present in the pet food."

"Pet food shall not be treated as misbranded by reason of the following claims in labeling and promotional materials for pet food..." "Claims regarding hairball control." "Claims regarding tartar control, plaque removal, and bad breath odor." "Claims regarding the ability of pet food to support general urinary tract health." "Natural' claims"

Source: <https://www.congress.gov/bill/118th-congress/house-bill/7380/text>

In most US states, the regulatory authority of pet food is the state's Department of Agriculture – a government authority. But three US states give pet food/animal feed regulatory authority to a University within their state boundaries. The state of Kentucky gives regulatory authority to the University of Kentucky, the state of Indiana gives regulatory authority to Purdue University, and the state of Texas gives pet food/animal feed regulatory authority to Texas A&M University.

Sources: <https://www.rs.uky.edu/home/>
<https://oisc.purdue.edu/petfood/index.html>
<http://otscweb.tamu.edu/>

Of concern, pet food manufacturers are allowed to donate to these universities that regulate their products.

One example of these donations: *“The veterinary industry can anticipate exciting new breakthroughs in the frontier of pet microbiome health thanks to a new partnership between Nestlé Purina PetCare Global Research and the Gastrointestinal Laboratory at Texas A&M University’s School of Veterinary Medicine and Biomedical Sciences (VMBS). The partnership is made possible through a \$2 million Purina PetCare Research Excellence Fund, which will run from 2023-2028 and will support diagnostic and interventional research conducted at the Texas A&M Microbiome Research Laboratory.”* Texas A&M University, which received the \$2 million donation from Purina, hosts a veterinary school and the regulatory authority of pet food in the state of Texas.

Source: <https://today.tamu.edu/2023/04/19/purina-petcare-texas-am-gastrointestinal-laboratory-join-forces-to-advance-pet-microbiome-health/>

In FTC’s notice of extended comment period, you stated firms *“can amass significant control over key products, services, or labor markets without government scrutiny.”* We ask the FTC to give close scrutiny to these manufacturers’ potential significant control of the pet food industry in order to protect pet food consumers.

Susan Thixton

Association for Truth in Pet Food, a pet food consumer stakeholder organization

AssociationforTruthinPetFood.com

TruthaboutPetFood.com