

**From:** [Gallagher, Kurt](#)  
**To:** [Bradbard, Laura](#)  
**Cc:** [Dunham, Bernadette M](#); [McChesney, Daniel G](#); [Benz, Sharon A](#); [Barrett, Kari](#); [Bensette, Megan](#); [Ekedahl, Duane](#); [Tabor, Peter](#); [Tovey, Pat](#)  
**Subject:** PFI Feedback on FDA video "Safe Handling of Pet food in the Home"  
**Date:** Friday, March 14, 2014 4:03:53 PM  
**Attachments:** [Attachment B - Safe Handling of Pet Food in the Home 2014 - PFI Suggested Edits FINAL.docx](#)  
[Attachment A - Transcript - Safe Handling of Raw Produce and Fresh-Squeezed Fruit and Vegetable Juices - FDA Video.docx](#)

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Dear Laura,

On behalf of PFI members, I would like to provide feedback on the updated video "Safe Handling of Pet Food in the Home" (i.e., "pet food video"). First, I would like to express appreciation for the modifications that were made to the prior video. It is now more educational and consumer friendly largely because it contains far less alarmist language and imagery. Language was added that offers practical and sound advice to pet owners regarding how to handle pet food and how to maintain the cleanliness of their kitchen in a manner that should not cause fear of pet food products. The expanded language about the importance of contacting the pet food manufacturer with product comments or questions is helpful both to pet owners and to the companies responsible for pet food products.

I would like to address two sections of the video where the language and imagery remains alarmist and out of proportion to the relative risk posed by pet food products compared to other potential sources of foodborne illness. Furthermore, these sections are out of sync with the rest of the video. In our two previous letters regarding the pet food videos, we cited the FDA video "Safe Handling of Raw Produce and Fresh-Squeezed Fruit and Vegetable Juices" (i.e., "produce video") as a consumer-friendly model for the pet food video. A transcript of the produce video is provided as Attachment A. The tone and approach of the produce video is vastly different from all versions of the pet food video, including the latest version.

PFI strongly urges FDA to re-record the audio track for two segments of the pet food video in order to replace statements that are alarmist and out of proportion to the risk posed by pet food. The statements are made during segments when Dr. Hodges is off camera, so minimal equipment and production time should be needed to make the changes. In Attachment B you will see suggested edits to the script of the pet food video, which are largely insertions of language that was adapted from the produce video.

It seems that PFI's two letters on the previous versions of the video were taken as a challenge to better document the potential risk posed pet food. Hence the addition of the statements "On average, 60 pet food or treat products are recalled each year due to Salmonella contamination" and "In one recent outbreak, more than 20 cases of human illness were linked to dog food made at one plant and contaminated with Salmonella." The purpose of the pet food video should be educate and provide helpful tips, not frighten pet owners by providing alarming facts with no appropriate context. The inclusion of these statements is a disservice to pet owners, the public and the pet food industry. These statements should be struck.

Again, I refer you to the FDA produce video. It makes no mention of the number of recalls per year, the number of illnesses caused by produce, or the symptoms of foodborne illness (approaches that could be characterized as scare tactics). Nowhere in the produce video do any of the following words appear: deadly, very serious, Salmonella, sick, or sanitize. The produce video opens with a statement about the healthfulness of fresh produce, whereas in stark contrast, the pet food video starts with a warning about how pet food can make "you sick."

I wish to reiterate a sentiment expressed in the two previous letters from PFI on this subject, the tone of the produce video should have been replicated in the video on pet food. The changes suggested in Attachment B replace alarmist language with statements adapted from the script of the produce video that provide pet owners with helpful advice in a manner that will not scare them.

In closing, PFI is appreciative of the effort to get the pet food video “right.” The changes made in this latest version remove much of the language and imagery that were of concern in the previous versions. While this latest version does not hit the mark, the minor suggested edits would put it on target.

Thank you for giving consideration to these important revisions to FDA's latest version of the video on the safe handling of pet food.

Kurt Gallagher  
Director, Communications and Export Development  
Pet Food Institute  
2025 M Street, NW, Suite 800  
Washington, DC 20036

(202) 367-1120  
(202) 367-2120 fax  
[kurt@petfoodinstitute.org](mailto:kurt@petfoodinstitute.org)  
[www.petfoodinstitute.org](http://www.petfoodinstitute.org)

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## Attachment A

### Safe Handling of Raw Produce and Fresh-Squeezed Fruit and Vegetable Juices

<http://www.youtube.com/watch?v=WbhudxB3W-M>

Fruits and vegetables, so fresh, so colorful, so delicious and healthy. We can all be healthier and improve our diets by eating more fruits and vegetables. As with any food product, you have to be careful with how you handle and prepare what you eat. It's as easy as washing your hands before touching fresh fruits and vegetables.

Growers and processors are responsible for preventing bacteria in the soil or water from contaminating fresh fruits and vegetables where they're grown or processed. With fresh cut produce, like bagged salads or cut fruit, make sure it's refrigerated or surrounded by ice, and don't buy bruised or damaged fruit. It's a great place for bacteria to hide and spread rapidly to the rest of the fruit.

While shopping and when checking out, keep your fresh fruits and vegetables separate from meat, poultry and seafood. And make sure you're in the right line.

At home, store fruits and vegetables that require refrigeration immediately in the refrigerator, especially anything that's precut or peeled. Use a thermometer to ensure that food in your refrigerator stays at 40 degrees Fahrenheit or below. We all know that we need to wash our hands after handling raw meat, and we should also wash our hands after handling produce too. Cut away damaged or bruised areas on fresh fruits and vegetables before preparing or eating. And make sure you wash the produce before you eat it, even if you plan to peel it. If it's something firm, like a melon or cucumber, use a produce brush. There's no need to use soap or a produce wash. Plain running water is fine.

For precut, bagged items, look on the package. If they're labeled "prewashed" and "ready to eat", there's no need for additional washing. If you're eating fruits and vegetables raw, keep them separate from foods such as raw meat, poultry and seafood, and the utensils used to prepare them. This will help avoid cross contamination. Use separate cutting boards for meats and produce, as well as for raw and cooked foods. And finally, wash cutting boards, utensils and countertops with hot water and soap between the time you prepare raw meats, seafood and poultry and any produce that will not be cooked.

For plastic and other nonporous cutting boards, just run them through the dishwasher when you're done.

Nothing like a glass of orange juice to get your day started. Most of the juices sold in the U.S. are pasteurized or otherwise treated to kill harmful bacteria, but if you enjoy buying fresh squeezed juice like I do, you should know that untreated fruit and vegetable juices may contain harmful bacteria. Some stores, cider mills or markets sell packages or containers of fresh squeezed juice that have not been pasteurized or treated to kill harmful bacteria. If you're at risk for foodborne illness, like the young, the elderly or people with weakened immune systems,

it's advisable to look for a warning label on the package. Juices that are fresh squeezed and sold by the glass may not be pasteurized or treated and do not require a warning label. While normally safe, if you're at risk for foodborne illness, you should not drink unprocessed juices.

Keeping these common sense tips in mind will not only improve your diet, but also help keep you and your family safe from any foodborne illness possibly associated with fresh fruits, vegetables and juices.

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## Attachment B

### Transcript of FDA Video: Safe Handling of Pet Food in the Home Version 3 (February 2014)

We at FDA have responsibilities for making sure that pet food is safe and nutritious for your pet. We also offer advice for safe handling of pet food and treats in the home. For safe handling, no one plays a more important role than you do.

Hello my name is Dr. April Hodges. I'm a nutritional scientist at the U.S. Food and Drug Administration. ~~Most pet food is designed to provide safe, healthful nutrition for your pet. When handling food for yourself, or your pets, you should practice good hygiene including washing hands, bowls and utensils, but sometimes pet food and treats can become contaminated with bacteria that can make not only your pet sick, but you sick. Salmonella is perhaps one of the best known bacteria that may be found in pet food or on pet treats, but it is not the only one.~~

~~Contamination by Salmonella and other types of bacteria may not be frequent, but it happens. On average, 60 pet food or treat products are recalled each year due to Salmonella contamination. Pet food manufacturers are responsible for preventing bacteria from contaminating pet food and pet treats when they're processed. Human Foodborne illness can be caused by contact with contaminated pet food or treats. In one recent outbreak, more than 20 cases of human illness were linked to dog food made at one plant and contaminated with Salmonella.~~

The initial symptoms of ~~foodborne~~ illness ~~caused by Salmonella include~~ nausea, diarrhea and vomiting ~~are the same with other types of foodborne illness~~. For most adults, the problem is an unpleasant nuisance or a few days in bed, but for young children, older adults or individuals with suppressed or compromised immune systems the illness caused by ~~these~~ foodborne bacteria can be very serious ~~or even deadly~~.

No matter whether you give your pet a commercially prepared diet or raw meat you can avoid problems if you follow some basic, common sense food safety guidelines.

Avoid buying pet food in dented cans, or pet food or treats with torn packaging. Damaged packaging potentially allows pet food or treats to be exposed to harmful bacteria.

Wherever you feed your pet, try to select a location that can be easily cleaned and sanitized to eliminate possible pathways for food contamination. Be sure to wash the counter, ~~floors~~ and any contact surfaces with soap and warm water whenever pet food or treats come in contact with them. Wash your hands after handling pet food. Wash bowls and utensils used for pet food with soap and warm water to remove harmful bacteria that may be present. Using utensils strictly for pet food is an extra precaution against the possible transfer of bacteria from pet food to human food. After opening a can of moist or semi-moist pet food, seal it and properly store any unused portion in the refrigerator. Keep dry pet foods in a cool, dry place and sealed in a container to prevent spoilage.

No matter how you store your pet food, be sure to keep the original packaging. Product information contained on the bag, including the manufacturer's information, lot code, UPC number, and expiration date is helpful in an investigation if pet food is suspected as the source of an illness.

**Commented [t1]:** This modification is parallel to the opening of the produce video, although it is not as effusive as the produce video language:

"Fruits and vegetables, so fresh, so colorful, so delicious and healthy. We can all be healthier and improve our diets by eating more fruits and vegetables."

**Commented [t2]:** This is a variation on the language at the open of the produce video.

**Commented [t3]:** This is nearly identical language as what's in the produce video.

**Commented [t4]:** This seems silly and out of touch. What is the public to do when floors that come in contact with shoes that may have stepped in any number of substances containing who knows what kind of bacteria?

If you are handling raw pet food, including frozen meats, take the same precautions as you would with any other raw meat product.

Teach family, including your children, about these important safety steps so they can help protect themselves and others from [foodborne](#) illness.

~~Bacterial contamination is one potential problem with pet food, but there are others like contamination with chemicals or toxins or including too much or too little of certain ingredients during manufacturing. While these contaminants may not harm humans, they can present a serious risk to your pet.~~

What should you do if you suspect a problem with pet food or treats? You know, of course, to get medical attention if someone in your family gets sick. The same should be true for your pet. If your pet shows signs of illness, your veterinarian is the person who can help the most. She or he will be able to decide on a course of treatment by examining your pet. FDA can't help you treat your pet. The company that manufactured the food can't deliver the needed treatment and neither can the store that sold you the product, so please call your veterinarian.

And even though the manufacturer can't help treat your pet, you should still notify the company. You can find the manufacturer's contact information on the product packaging.

If you think pet food or treats have made your pet sick, someone else's pet sick or made someone in your family sick, report it to FDA. We review all complaints we receive. Your report can help us protect the health of who knows how many people or pets. It will be compared with other complaints we've received to help us determine where there are problems.

Reporting the problem is easy. You or your veterinarian should contact FDA and give us as much information as you can about the product and what happened. You can do this in one of two ways. You can make a call to your state's FDA Consumer Complaint Coordinator. You'll find the phone number on the FDA website, [www.fda.gov/petfoodcomplaints](http://www.fda.gov/petfoodcomplaints).

Or you can file a report online through FDA's safe feed reporting portal.

Whether you report the problem to FDA by phone or the Internet, we'll need some specific information. We need to know the type of pet food or treat, and whether it was for dogs, cats or other pets. We also need to know the brand and the manufacturer, where and when it was purchased, as well as any information found on the packaging like lot numbers and when it was manufactured.

All this information will help us determine if there's a problem with the pet food. If there is, this information will make it easier for us and the manufacturer to get the affected products off of the market and begin to identify what went wrong.

Just like many of you, we too are pet owners who think of our pets as members of our family. This makes our work of protecting the safety of their food especially important to us. We look forward to working with you to keep all of our pets safe and healthy.

Thank you.

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**Commented [t5]:** These issues have nothing to do with safe handling. This sort of language is in stark contrast to the consumer-friendly tone and language in the produce video.