

KSU Forum  
Re: Dilated Cardiomyopathy  
By: Dana Brooks, Pres. & CEO PFI  
September 29, 2020

Good morning. I'm Dana Brooks, President and CEO of the Pet Food Institute in Washington, D.C.

Thank you to Kansas State University for extending the invitation to me as the representative of the Pet Food Institute or PFI. I'm here today to provide PFI's perspective on Dilated Cardiomyopathy or DCM.

My remarks will be brief but they convey important points PFI would like everyone in this scientific forum to consider as we seek to identify the factors that could contribute to the occurrence of DCM in dogs.

The Pet Food Institute was established 62 years ago to be the voice of the pet food industry in Washington, D.C. PFI member companies make approximately 90% of all U.S. pet food and treat products.

Beyond making and distributing safe foods for the nation's pets, our member companies are integral to the health of local economies, employing 30,000 people in 31 states across the country.

PFI members also support businesses across the supply chain, including farming and ranching, processing, equipment suppliers, transportation, technology services, and retailers. The vast majority of ingredients used by our members are sourced from within the United States.

We provide **factual information about pet food and treat safety, nutrition, and health to pet lovers, regulators, and the scientific community; and, we advocate for a transparent, science-based regulatory environment for our members.**

We are dedicated to:

- Advocating for legislation, regulations and technologies that support the domestic manufacture and global distribution of safe, quality pet food and treats, and that provide for consumer choice;
- Promoting pet food and treat safety through innovation in manufacturing and handling practices;
- Developing and disseminating information on issues affecting pet food and treat makers, their suppliers and distributors, pet lovers and other relevant stakeholders; and

- Communicating the benefits of pet ownership to the general public at large.

We are not just pet food manufacturers; we are pet owners.

All of this is to say, I am here today to address one issue that has impacted every facet of pet food from ingredients to retailers and from shoppers to veterinarians.

We have been stressed and stretched since June 2018 when the U.S. Food and Drug Administration (FDA) Center for Veterinary Medicine notified the public about a potential association between grain-free diets and DCM; that the agency saw signals that suggested to it that there could be a correlation between grain-free diets and Dilated Cardiomyopathy.

Relying on the Veterinary Laboratory Investigation and Response Network's (Vet-LIRN's) data collection, FDA first reported in July 2018 that a majority of the pets not genetically predisposed to heart conditions that were affected by DCM were on grain-free diets, especially diets that were high in pea, lentil, legume and potato content.

It has been a roller coaster since that initial notification, and even more so after the last update released by FDA on June 27, 2019.

**What do we know now?**

**We know that DCM is a complex, complicated issue that must be discussed with transparency, scientific rigor, and precision in order to make progress in understanding the condition and its potential causes.**

We cannot be distracted by false assumptions or misinformation, and the work of this forum is to refocus on the science. It's critical that we get this right because of its importance to those of us in the pet care community, to the people who buy dog and cat food products, and to the pets we and they love.

Let me state for the record, PFI members devote millions of dollars to researching their formulations to ensure they deliver the safe and nutritious products that pet owners have come to expect.

Safety is our #1 priority and is not considered a competitive issue.

That is, our members regularly exchange information regarding product safety challenges and solutions.

This collaborative spirit has led to a significant reduction in issues related to safety for U.S. processed pet food, as evidenced by FDA's own data on voluntary recalls for these products.

Along with our commitment to product safety is the wealth of expertise and institutional knowledge our members have.

I know several PFI members are with us today – some are presenting – and I am confident that collaborating once again has helped us better understand DCM in dogs.

PFI's own Nutrition Subcommittee has devoted thousands of hours and resources over the past two years to better understand whether nutrition played any role in the occurrence of DCM in dogs, including those not recognized as genetically predisposed to the disease.

Many of these nutritionists played key roles in the 1990s in the effort to understand DCM in cats.

The process to develop this standard, now adhered to by all makers of complete and balanced cat food marketed in the United States, involved years of intensive research to understand the role of several amino acids and one in particular, taurine, in cat heart health.

But, of course, dogs are not cats. Dogs are not obligate carnivores and unlike cats, dogs can synthesize taurine from other precursors if those precursors are provided in sufficient quantities in the diet.

Along those lines, the discussion of DCM in dogs, both here today and in the larger context involving pet owners and veterinarians, must acknowledge the complexity of this disease and the numerous factors that can contribute to its occurrence. Accepting unfounded, easy answers that implicate a particular diet, ingredient, or type of manufacturer is not helpful and will undercut our collective scientific efforts.

Our review of existing research, combined with the extensive expertise of our nutritionists, strongly points to the fact that the **causes of DCM in dogs are both complex and multifactorial**, and any study of this disease must take into account **genetics, breeding, dog physiology and other underlying conditions, and yes, nutrition, in order to develop a clear understanding of how each of these factors, alone or in combination, may lead to the occurrence of DCM.**

With that 360 degree approach in mind, we firmly believe that this symposium and the general discourse regarding DCM in dogs, including FDA's messaging, must abandon any broad generalizations that seek to characterize DCM as purely diet-associated or related to certain ingredients and we must remain vigilant in correcting any media distortion that fails to address the entirety of this very important, science-based issue.

Research indicates that up to 44% of U.S. pet food formulations produced in 2018 were grain-free in certain markets. That means tens of millions of dogs are thriving on grain-free diets. Our position that healthy dogs do not need to change diet based on DCM concerns is consistent with FDA pronouncements on their website.

I want to assure you - there is no one who wants answers more than PFI's members. We have taken FDA's investigation and available data very seriously.

As pet food makers, it is our firm responsibility to help assure the health and well-being of the nation's pets by providing nutritious and safe products at all times.

As part of that responsibility, we want to understand whether there is any relationship between diet and DCM.

We fully recognize and appreciate this is a highly charged and emotional issue.

But the fact of the matter is, this is a scientific issue that requires a dispassionate and reasoned approach based on sound science. Unfortunately for our industry, social media moves faster than science and does so without facts or evidence.

We respectfully urge FDA and those who report on DCM to do so from the perspective of science, relevant data and reasoned thinking. Doing so will help us

to work through this issue together and obtain the answers we need in a way that helps our pets, those who love them, and those of us in the pet care community who are committed to **doing the right thing each and every day.**

Again, thank you for this opportunity to be here with you today.