Pet Schooled

The Educated Community

May 07, 2022

Via Electronic Submission

Division of Dockets Management
Food and Drug Administration
Department of Health and Human Services
5630 Fishers Lane, Room 1061 (HFA-305) Rockville, MD 20852

Re: Citizen Petition- Asking FDA-CVM To Hold At Least One Public Regulatory Meeting In The Year 2025, For The Promulgation Of Animal Feed/Pet Food Ingredients And Their Definitions, In Compliance With Requirements § 553 of the Administrative Procedure Act.

To whom it may concern:

The undersigned submits this petition under both the Federal Food, Drug, and Cosmetic Act (the Act), and § 553 of the Administrative Procedure Act (5 U.S.C. Subchapter II), and in accordance with 21 C.F.R. § 10.30(b), to request the FDA-CVM to hold at least one public regulatory meeting in the year 2025, for the promulgation of animal feed/pet food ingredients and their definitions, in compliance with the public rulemaking requirements of § 553 of the Administrative Procedure Act.

A. Action Requested

Petition requests FDA-CVM to hold at least one public regulatory meeting in the year 2025, for the continued development of animal feed and pet food ingredients FDA intents to recognize federally, and ensure this public meeting complies with the § 553 of the Administrative Procedure Act.

B. Statement of Grounds

FDA-CVM plans to continue to adopt privately developed ingredients and their definitions (regulations) in 2025 and onward. FDA-CVM intends to continue to cut members of the public out of the process, in a continued violation of the requirements of § 553 of the Administrative Procedure Act.

Due to FDA having MOU 225-07-7001 with this private corporation AAFCO, which is a collection of public regulatory officials performing rulemaking via a private corporation umbrella, my rights under §553 of the Administrative Procedure Act are being violated.

FDA-CVM holding a public regulatory meeting in 2025 and ensuring this regulatory meeting for the development of animal feed and pet food ingredients is compliant with the requirements of §553 of the Administrative Procedure Act, would rectify this issue of citizen rights being violated.

I note that FDA-CVM's ongoing MOU 225-07-7001 with what FDA refers to as its "regulatory partners", will automatically adopts/recognize the groups private rulemaking work in 2025 at the federal level, even though various aspects of §553 of the Administrative Procedure Act have not been met, including but not limited to announcements for new ingredient terms on the federal register, a public comment period, and the official process of producing a "final" ingredient rule/regulation.

Petition requests FDA-CVM to hold a public regulatory meeting in the year 2025, in compliance with the §553 of the Administrative Procedure Act.

C. Environmental Impact

A claim for categorical exclusion of the requirement for submission of an environmental assessment or environmental impact statement is made pursuant to 21 C.F.R. §§ 25.30 and 25.34.

D. Economic Impact

In accordance with 21 C.F.R. § 10.30(b), economic impact information is to be submitted only when requested by FDA following review of the petition. The undersigned will promptly provide this information if requested.

E. Certification

The undersigned certifies, that, to the best knowledge and belief of the undersigned, this petition includes all information and views on which the petition relies, and that it includes representative data and information known to the petitioner which are unfavorable to the petition.

Kohl Harrington

Kohl Harrington
Director- Pet Schooled
9663 Santa Monica Blvd. #1267
Beverly Hills, CA 90210
323-237-9958
kohl@harringtonfilms.com