

APPA

American Pet Products Association

December 17, 2018

Don Onwiler
Executive Director,
National Conference on Weights and Measures
don.onwiler@ncwm.net

Dear Mr. Onwiler:

The American Pet Products Association ("APPA"), headquartered in Stamford Connecticut is the leading trade association of pet product manufacturers. APPA, founded in 1958, has a membership of over 1200 pet product manufacturers and undertakes to promote responsible pet ownership and to advance the pet industry.

We are writing to you to express our concerns with the changes to the method of quantity declaration that has been proposed for the 2019 National Institute of Standards and Technology (NIST) Handbook 130 for pet treats and chews, which would require a declaration statement solely of weight for these products. The proposed language states:

"2.37 Pet treats or Chews-Digestible chews, rawhides, bones, biscuits, antlers or similar type products shall be sold by weight."

Natural part animal chews and treats are sold and distributed by many of our members including many that are considered very small businesses. Selling natural animal part chews such as rawhide, bones and antlers by numerical count, rather than weight, is a long established and common practice in the industry and has been accepted by consumers. It will be a burden for many APPA members to change the quantity declaration packaging requirements for these products, and that change could create a disruption in the marketplace and increase costs for the consumer. The natural part chews are not a formulated product and thus are not standard sizes and weight and would be a substantial burden to package these products to ensure specific weights. Because the sizes of these products naturally vary, often the contents are visible in the packaging so that consumers can see the specific natural animal parts that they are purchasing. This enables consumers to make a reasonable comparison of the specific products offered.

We hope you will reconsider the established practice of how these products have been generally offered for sale and how this change will impact a significant number of small businesses.

We join with our colleagues at the Pet Food Institute asking you to reconsider this section of the NIST Handbook. We appreciate your consideration.

Yours truly,



Debora Eisen
Senior Regulatory Counsel & Legislative Director

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