

04-047-1

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N National G Greyhound A Association

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Docket No. 04-047-1
Regulatory Analysis and Development, PPD
APHIS
Station 3C71
4700 River Road Unit 118
Riverdale, MD 20737-1238

Subject: Docket No. 04-047-1

By way of introduction, the National Greyhound Association (founded in 1906) is the official registry for racing Greyhounds in North America. Our membership is the 2,900 owners and breeders throughout the country.

We are continually concerned with regard to any rule changes that might affect the redmeat that is fed to the Greyhound population. On p. 42298 of the above-named Docket, the FDA seeks comments on question #20 (Can SRMs be effectively removed from dead stock and non-ambulatory disabled cattle so that the remaining materials can be used in animal feed, or is it necessary to prohibit the entire carcass from dead stock and non-ambulatory disabled cattle from use in all animal feed?) It's our understanding that SRMs are not part of the product used in making redmeat feed for Greyhounds. Although the meat is from dead or non-ambulatory cattle, the cuts are all muscle meat, therefore SRMs do not come into play here.

As for question #22 on the same page (What would be the economic and environmental impact of prohibiting materials from dead stock and non-ambulatory disabled cattle from use in all animal feed?)—we estimate that the current cost of redmeat fed to Greyhounds is around \$10 million annually. To replace the current petfood grade meat if it was banned, the Greyhounds would have to be fed meat edible for human consumption since that would be the only available redmeat supply. I would conservatively estimate the \$10 million to balloon to \$30 million or higher, and in a tight margin business such as ours this would be very detrimental to our members—probably driving many of them out of

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Established in 1906

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business. This would have a stifling effect on this agriculturally based industry, substantially reducing the number of dogs bred and raised (currently more than 33,000 new pups a year).

The environmental impact would also be costly, with dead and non-ambulatory having to be hauled to landfills with the costs associated, along with the fact that the landfills are already overloaded. Also dead cattle would inevitably be left in the fields creating problems with groundwater and vermin—another negative impact.

Thank you for your consideration of these matters.

Sincerely,



Gary Guccione
Exec. Dir.