

# N National G Greyhound A Association

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Feb. 7, 2003

Dockets Management Branch (HFA 305)  
Food and Drug Administration  
5600 Fishers Lane, Rm. 1061  
Rockville, MD 20852

Re: Docket No. 02D-0468

To Whom It May Concern:

On behalf of the more than 3,000 Greyhound owners and breeders in North America that register their Greyhounds through our organization (the National Greyhound Association), we wish to comment in regard to the recently released "Guidance for Industry" document entitled: "MANUFACTURE AND LABELING OF RAW MEAT FOODS FOR COMPANION AND CAPTIVE NONCOMPANION CARNIVORES AND OMNIVORES."

First, by way of background, the NGA was founded in 1906 and is the oldest Greyhound-related organization still in existence in this hemisphere. We are located in Abilene, Ks., and are the official registry for racing Greyhounds in North America. Our membership is comprised of the owners and breeders of racing Greyhounds on the continent.

The so-called 4D meat used by Greyhound owners at farms and in racing kennels has been a tried and proven practice for many decades now. (We note that "dog racing facilities" were mentioned—along with zoos and mink farms and "other professional establishments"—as a market for such products in the report.) We are pleased to report that the use of this meat has more than adequately served the purposes of Greyhound owners across the country for many years. We offer some statistical information that substantiates the industry's confidence in the use of this meat.

There are approximately 33,000 Greyhound pups born each year in North America



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(verified by NGA registry records). Average value of a young, Greyhound pup growing up on the farm is approximately \$2,750; it will cost just under that figure to raise the pup from whelping to track-age (approximately 18 months of age). The average value of a Greyhound in a racing kennel at the 48 racetracks nationwide is approximately \$6,000. Our semi-annual auctions in Abilene sell young track-ready pups at an average price of just over \$6,000. Last fall, a promising young pup actually sold at auction for \$55,000.

It is significant that owners feed these very valuable Greyhounds—even those that are stake champions or that sell for substantial five-figure prices—the very same 4D meat as is fed to the entire farm or the entire racing kennel. This underscores the confidence owners have in this product, as a result of their experiences with it over the years. The NGA is unaware of any professional Greyhound kennels or farms that use any other classification of meat as a major part of their Greyhound feeding programs.


Owners, breeders and trainers know how to safely feed and handle the meat fed to their Greyhounds. If there were significant problems or complaints regarding the meat, the NGA—as the only national organization representing the owners and breeders—would certainly be hearing about it.

Such complaints have been extremely rare in recent years. Fifteen or twenty years ago, we'd hear an occasional complaint about a temporary sickness that passed through the pups in a kennel or on a farm, assumedly caused by the meat. I must say, however, that such complaints or problems have been drastically reduced in more recent years—in fact, the complaints are practically non-existent these days. This leads us to believe that the quality of the meat provided by the manufacturers to Greyhound kennels and farms has actually improved in quality in the last five to ten years.

Because of these facts and observations, we respectfully request that the draft guidances of the FDA clearly permit the continued use of this meat by Greyhound owners and other professional industries.

Thank you for your consideration; if at any time you have any questions or seek further information, please contact me.

Sincerely,

  
Gary Guccione  
Exec. Director