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November 9, 2001

Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
300 12th Street, SW
Room 102 Cotton Annex
Washington, DC 20250

101

01-030N
01-030N-101
Edward Putnam

Re: Docket Number 01-030N
Industry Petition to Postpone the Effective Date of Regulations Limiting
and Requiring Labeling for Retained Water in Raw Meat and Poultry
Products.

The following comments are submitted in support of the above referenced industry petition:

- The six months after the "pre-implementation procedures" were published is not adequate time for plants to develop their protocols using the FSIS example.
- There needs to be at least a full year of testing products to allow for seasonal variations after the correct process is established. Additionally, the required Salmonella testing will overwhelm the current laboratory capacity.
- The new labels that will need to be made for all companies will overwhelm the few companies that make labels.
- Delaying implementation of this will not adversely effect the consumer because nothing will change from current quality products, whereas forced implementation of the January 9, 2002 deadline may very well shut down our industry.

Sincerely,

Edward Putnam
Division Manager