



GOLD KIST INC. West Georgia Poultry Division
616 Kingsbridge Road • P. O. Box 525 • Carrollton, GA 30117-0525 • Phone (770) 832-7071 • Fax (770) 214-3277

November 12, 2001

102

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

01-030N
01-030N-102
Richard Curvin

NOV 13 2001

Dear Sirs:

This is in response to the Announcement of and Request for Comment on Industry Petition to Postpone the Effective Date of Regulations Limiting and Requiring Labeling for Retained Water in Raw Meat and Poultry Products.

Gold Kist Inc. is the second largest and only farmer-owned poultry processor in the industry. We support the petition filed by the National Chicken Council and other meat industry organizations seeking extension of the compliance date to August 1, 2004 for these reasons:

- The industry lost six months (one-half of the anticipated time) of data collection time when the FSIS response on the industry's generic protocols was delayed until July.
- Compliance requires sequential, rather than concurrent, completion of four steps, including printing new labels and packaging. There is not sufficient time to accomplish these steps, owing to the large volumes involved.
- Compliance with the 2002 deadline could create supply problems that would work a hardship on consumers as well as processors.

We urge the FSIS to extend the moisture rule until August 1, 2004.

Sincerely,

Richard Curvin
Division Manager