



GOLD KIST INC. Northwest Georgia Division
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November 12, 2001

105

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-105
 George A. Winn

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 01, 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 01, 2004.

Sincerely,

George A. Winn
 Division Manager

GAW/sst