



GOLD KIST INC. North Carolina Poultry Division
484 Zimmerman Road • P.O. Box 3668, Sanford, NC 27330 • Phone: (919) 774-7333

November 16, 2001

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01-030N
01-030N-123
Ralph T. Upton

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

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,

Ralph T. Upton
N.C. Division Manager