

GOLD KIST INC.

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

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01-030N 01-030N-124 James L. Ayres
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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.
- At the Retained Water Final Rule Briefing on February 27, 2001 in Omaha, we were told that by FSIS whole bird weight pickup correlated with thigh tissue (meat and skin) moisture content (see attachment 1). We included thigh tissue moisture content in one of our protocols tested at a poultry plant following FSIS guidance (see attachment 2).
- We found no correlation between thigh tissue moisture pickup and whole bird weight pickup (see attachments 3 and 4). After obtaining these results we have to revise all our retained moisture protocol and retest tissue moistures by another method.

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

Sincerely,



James L. Ayres, Ph.D.
Director of Research & Quality Assurance

JLA/dms