



# ConAgra Foods®

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

Nov. 7, 2001

01-030N  
01-030N-126  
Terry Paschall

**Dear Sirs,**

This letter is in reference to docket #01-030N Request for extension on the Moisture Retention Rule. I am in favor of granting the above extension. When the rule was published in January of 2001 there were many unclear points in it. The first industry/agency meeting was not held until early March. At that meeting several questions were posed that the agency said they would have to get back to us and that would happen within 30 days. The response to those questions did not come until July of 2001. This left us less than 6 months to accomplish the requirements of the rule. There is not adequate time to do all the testing required for the rule in that time frame.

We have not only the moisture minimization portion to deal with but also the retained moisture by product type. Some of our facilities have many different categories of poultry products ranging from whole birds to deboned breast meat. We must determine the natural moisture and then the retained moisture on each category. This is a huge amount of testing that is required. In the minimization portion we have numerous microbial samples to run in limited lab capacities.

Once we have the testing done from above we must then have time to get new packaging material ready and hopefully have some time to use up existing material to avoid a huge monetary negative due to disposing of unusable packaging material. It will take the packaging material suppliers quite a bit of time to fulfill the needs of the entire industry in this area.

For these reasons I feel that the requested extension be granted.

Terry Paschall  
General Manager

