



# DRAPER VALLEY F A R M S

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

From: John Jefferson, Draper Valley Farms

Re: Industry Petition to Extend the Moisture Rule Effective Date  
Docket # 01-030N

01-030N  
01-030N-140  
John Jefferson

Draper Valley Farms is a small family owned business.

If the deadline of January 9, 2002 for the implementation of the new moisture rule is not extended, it would cause an undue hardship on our business. We are supporting the petition to postpone the implementation of this procedure.

We would like to reemphasize the following points:

- It was not until July, when FSIS responded to the industry' and published its "pre-implementation procedures", that the poultry industry had sufficient information to begin complying with the regulation. Six of the 12 months compliance time was lost.
- Compliance with the regulation requires the completion of four steps, which can only be done consecutively, not concurrently (i.e., protocol submission and review, data collection to validate unavoidable moisture absorption, data collection to obtain moisture retention for individual products, and the designing and printing of new packages and labels). Given the volume involved in each of these steps, as discussed in the petition, the one-year compliance time frame provided in the regulation is insufficient even if the poultry industry had been able to use all 12 months.
- It would be unfair to the industry and the consumer to not grant the extension. Without a reasonable extension, most, if not all, of the poultry industry would have to shut down. This would force many companies to go out of business. It would also deprive consumers of having access to wholesome, nutritious, and economical poultry products. Since nothing will change, from the consumer's perspective, if a postponement is granted, the only negative impact on the consumer is if a postponement is not granted.

Sincerely,

John Jefferson  
Vice President of Sales/Production  
Draper Valley Farms