



Wednesday, November 07, 2001

Docket Clerk
U.S. Dept. of Agriculture
Food Safety and Inspection Service
300 12th St. SW Rm 102 Cotton Annex
Washington DC 20250

Reference docket # 01-030N

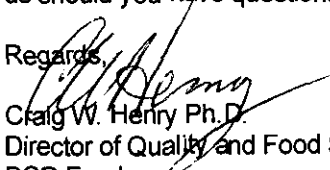
Dear FSIS:

BCR Foods supports the petition from the National Chicken Council regarding the postponement of the final rule codified 9CFR 441.10 until August 1, 2004. The reasons are obvious to the industry and again emphasized to the Food Safety Inspection Service.

- 1) The protocol (log Number RWP-0059-01) submitted by BCR Foods was not approved until August 24, 2001. Therefore less than 6 months of testing time before implementation of January 9, 2002.
- 2) We should verify the proper unavoidable moisture levels as correlated with measurable Salmonella for at least 1 year to determine the affect of;
 - A) Seasons on processing conditions.
 - B) Seasons on broiler salmonella levels as chilling conditions are varied.
 - C) Seasonal affect on growing conditions as related to Salmonella levels on broilers.
- 3) Correlation of moisture levels measured at the processing facility with those taken by USDA/FSIS in the "marketplace" as described in FSIS Notice 22-01 of 6/29/01 subsection XVII.
- 4) The additional time will ensure a smooth seamless transition of labeling without interruption of flow of finished products to consumers.
- 5) Allow the industry to properly evaluate further processed products for retained moisture and appropriate labeling.

BCR Foods looks forward to a positive response from FSIS in approving this petition. Please contact us should you have questions.

Regards,


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