November 13, 2001

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 20205

Re: Docket number 01-030N Industry Petition to Postpone the effective Date of Regulations Limiting and Requiring Labeling for Retained Water in Raw Meat and Poultry Products.

01-030N

01-030N-98

Brian Stanga

## The following comments are submitted in support of the above referenced industry petition:

We feel that more time is needed before the above-mentioned rule is put into place. Simply put there is not enough time to collect sufficient data and do a proper analysis on the collected data. We feel that data must be collected over a period of a year or years to properly gather data that would be affected by seasonal variations, breeds and chilling parameters. Once this data is collected and analyzed decisions must be made on labeling changes. This presents a problem as we currently have a large inventory of labels and packaging materials on hand.

We therefore feel that it would be fair to grant a delay until January 2004 for implementation of the retained moisture rule.

Sincerely

Brian Stanga