

**GLORIA A. KIEFNER
THE AUSTRALIAN CONNECTION EMU RANCH**

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July 21, 2003

Food Safety and Inspection Service, USDA
FSIS Docket Clerk
Docket 02-015DF, Room 102
Cotton Annex, 300 C Street, SW
Washington, DC 20250-3700

02-015DF-47
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Gloria A. Kiefner

Dear Sir or Madam,

I am responding to the above proposal to lift import restrictions for ratites and ratite products from Australia and New Zealand. I am very much against doing this.

As an American emu grower, like all American farmers at this time, I am struggling to keep my business going. Also, being a woman, this is a double challenge. I raise emu, along with my husband, mainly for the anti-inflammatory qualities that the emu oil exhibits. The emu meat is also a very healthy meat that is highly nutritional, low in fat and cholesterol. My emu, like most American emu, are raised using no added antibiotics, growth hormones or animal by-products.

Like most emu growers, our farm is a farm to finish business. We not only hatch the birds but, raise them, have them slaughtered and have the emu oil refined. Then we must find companies to further process the meat and oil into finished products. After all of this, we must then wholesale and retail the finished products.

It is very important that we be able to sell our meat, meat products, oil products, hides and leather products, feathers and eggs for a reasonable price in order to remain in business.

Australian emu oil is already undercutting American emu oil by one half or greater. Australian emu oil sells wholesal for \$35 to \$85 per gallon, while American emu oil sells for \$125 to \$160 per gallon, with little margins for profit. There is no way that American emu growers can compete with the low costs of raising emu in Australia and New Zealand. There is currently some Australian emu oil being sold in the United States that is of an inferior quality and is hurting the credibility of all emu oil. This oil does not follow the standards set forth here in the United States by the American Emu Association.

All American ratite growers will be hurt greatly by passage of an agreement to lift the import restriction with Australia and New Zealand. Please reconsider and withdraw this rule

Sincerely,

Gloria A. Kiefner

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