

**To: Food Safety and Inspection Service,
United States Department of Agriculture
Docket No: 05-012P
RIN: #0583-AD20
Action: Proposed Rule**

Submission for Petition from:

Dachan Greatwall Group
22nd Floor, Office Tower 1,
Henderson Centre
18 Jianguomen Nei Avenue
Beijing 100005, China
Tel: +86-10-6518-8366
Fax: +86-10-6518-8386
Email: john@dachan.com.cn

Petition for:

Addition of the People's Republic of China to the List of Countries Eligible to Export Processed Poultry and Poultry Products to the United States

We, **Dachan Greatwall Group**, agreed and support the **FSIS** proposal to amend **Section 381.196** of the Federal poultry products inspection regulations to add the **People's Republic of China** as a country from which processed poultry and poultry products may be eligible for import into the **United States**.

Our strong support is based on the common frame work, guidelines adopted in the close corporation between **FSIS** and **APHIS**, and under the same mandate of **PPIA** for effective implementation of poultry processing standards and procedures equivalent to **People's Republic of China's** poultry inspection laws and regulations. We believe that the equivalence study has been well conducted and certified by the **FSIS** reviewing committee, thereby, it should receive full recognition and support by the legislation and governing body of the **United States**.

In the first eleven (11) months of 2006, **China** has already imported processed poultry **331,458** metric tons, among which, **171,336** metric tons came from the **United States**. This statistics has reflected that there is a common bondage between the **United States** and the **People's Republic of China** in the regulation of poultry and processed poultry products, its stringent quality and safety guidelines, processing standards and procedures, as stipulated governing standards for its import and export. **Japan** in the first eleven (11) months of 2006 has imported **296,000** metric tons of cooked poultry products, among which, **160,000** metric tons are from **China**. This also means that **People's Republic of China's** government is very capable to closely supervise with strong commitment and together with the high efficiency of quality management by the established business enterprises in the industry, in the execution and complying with the regulation of international food safety, production procedures and processing standards. Thereby, this provides a proven foundation for the **People's Republic of China** to deliver consistent quality with high consumer confidence, and economical processed food to the **United States**.

From the view points and experience of our group of companies, **Dachan Greatwall Group**, its two state-of-the-art poultry processing plants in **China** have been certified and complied fully with the **People's Republic of China** export requirement for **Japan, Singapore** and **South Korea**. In addition, under the demand for quality management persistency, we also received the certification of **HACCP** as well as **ISO9001**. With the strong belief in update our quality management over the years as well as to improve our efficiency in every aspects of the business, therefore, we are able to maintain a consistent track record in food safety for export cooked and processed poultry products to **Japan**, and gaining high confidence and trust in our products from the region. Hence, with this solid foundation through long-term efficient execution can thus provide the same good confidence for the American consumers.

According to the proposal, it is suggested to open the import of cooked poultry products to the **United States** from the **People's Republic of China**, however the origin of the slaughtered poultry products that needed for further processing should not be only limited to those countries that are presently received eligibility from the **United States** (today only **USA** and **Canada** received the eligibility). We sincerely hope that the determination of eligibility is based on the standard rules adopted internationally for import of cooked poultry products, that is, to review, inspect and grand certification

to the qualified processing plants of the business enterprises, this includes the review of the quality control management for the ingredients usage and the required certification. Thereafter, to grant the approval and certificate from **FSIS** to the qualified business enterprises for export their cooked products to the **United States** and thus benefiting the American consumers with consistent high product quality at economical price.

As regard to the issue of Avian Influenza, in our opinion, this is a global issue. **China** is in close corporation with other countries in the international community finding ways and scientific solutions to contain this disease. This is also the common goal between the **United States** and **China**. We truly believe that, through the joint aggressive efforts by the international community, Avian Influenza can and will be controlled within a safety level.

Dachan Greatwall Group, sincerely welcome the **United States** to consider giving approval to add **People's Republic of China** to the eligibility list for export its poultry and processed poultry products to the **United States**. We also truly hope that our suggestions can be well considered and adopted. Furthermore, under the implementation of the above recommended standardized rules and guidelines, with our strong confidence, American consumers can certainly receive the greater benefits by enjoying tasty, nutritious, economical, and safe poultry and processed poultry products. Therefore, we are looking forward to seeing the passage of the proposed amendment and it's soonest execution.

Petitioners:

Dachan Greatwall Group –

Great Wall Gourmet (Dalian) Co., Ltd.

Great Wall Food (Dalian) Co., Ltd.

Miyasun-Great Wall Foods (Dalian) Co., Ltd.

Conti Wanda (Tianjin) Co., Ltd.