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FSIS Docket Clerk
DOCKET #99-017P
U.S. Department Of Agriculture
Food Safety and Inspection Service
Room 102
Cotton Annex, SW
Washington, DC 20250-3700

99-017P
99-017P-2
Lance M. Hill

Subject: Comments on FSIS Proposed Rule, 9 CFR Part 381 – Classes of Poultry

In general, Townsend, Inc. applauds the USDA, FSIS efforts to modernize the Classes of Poultry definitions for young immature chickens. It was clearly needed and to some extent, the old definitions caused confusion between industry and inspection personnel. We agree that current poultry production practices have outpaced the relevancy of the definitions established almost thirty years ago. Our comments however, are based in the belief that although the new proposed definitions is an improvement; they do not go far enough.

Basing all the classes in terms of age requirements might only continue some confusion between industry and inspection personnel. This is most probable when classes of poultry overlap, such as the proposed Broiler or fryer and Roaster or roasting chicken classes. The broiler class is proposed to be "less than 10 weeks of age" and the roaster is "less than 12 weeks of age". This would seem, and most likely interpreted by at least some industry and inspection personnel, that broilers and roasters could be classified into either class.

Using additional criteria, such as breastbone cartilage flexibility, adds to the confusion. Our veterinarian, who would likely be supported by many colleagues, finds it difficult to imagine that a 1-2 week difference in proposed ages of these two classes would manifest in a discernable difference in elasticity of the breastbone cartilage. Both of these classes are composed of young, immature poultry and as such, the bones are not mature.

In our experience, the term "Roaster" is market driven by the American consumer. From the consumer's point of reference, a roaster is an extra large or jumbo-sized chicken. This is regardless of how old the chicken is or how flexible the breastbone is. We have very clearly understood the consumer's need that the roaster meets very specific weight requirements, whether that is a whole

chicken or chicken parts. The American consumer does not accept the inclusion of perceived small chickens or parts, as roaster. Poultry meeting the proposed age definitions may or may not meet these basic requirements and be successful in the market place.

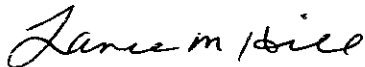
Our suggestion would be to allow the Roaster class to become a marketing term that may include young, immature poultry from the broiler class, as long as weight requirements are met. These requirements are distinctly driven by market demand and can be voluntarily set or determined by USDA, FSIS to establish standardized requirements. If this last determination method is utilized, it is highly recommended that a wide cross-section of buyers, consumers and industry be consulted on these weights.

This suggestion, being market based by the expectations of the consumer, would fulfill the mandate of the changes to "ensure that poultry products produced from young immature chickens are labeled in a truthful and non-misleading manner". Quality is meeting or exceeding the expectations of the customer and can be no truer than in this instance. Our experience with the buyers of roaster products are exclusively based on size and are defined by this and not age or an arbitrary scheme such as elasticity of breast cartilage.

In conclusion, we applaud the USDA, FSIS efforts to modernize an inaccurate classification system. However, we strongly urge the agency to look at the whole picture in regards to the roaster class. As presented in this proposal, there is no real difference between a broiler and a roaster based on age of bird at processing. Consider transforming the roaster term into a marketing tool that is sensitive to market weight or size expectations.

Thank you for the opportunity to comment on this rule. We hope that you will reconsider the details of the proposal before proceeding further. Please feel free to contact us if we can be of any further assistance in developing specifics regarding our suggestions.

Sincerely,



Lance M. Hill
Corporate Director of Quality Assurance
and Research & Development

cc: C. Dix
S. Klopp