



ConAgra Foods®

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01-030N-129  
11/07/01

November 7, 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 20250

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Ken Long

To Whom It May Concern:

This letter is in reference to docket #01-030N, Request for extension on the Moisture Retention Rule. I agree and am in favor of granting the above extension. When the rule was published in January of 2001, many items were unclear. The first meeting between industry and agency representatives did not occur until early March. At that meeting, the industry asked several questions that the agency was to have responded to within 30 days. The responses to those questions were not provided until July of 2001. This has allowed the industry less than 6 months for the industry to accomplish the requirements of the rule. This simply does not allow adequate time to perform all of the required testing.

The industry not only has the moisture minimization portion of the regulation to deal with but also the retained moisture by product type. Many facilities have numerous different categories of poultry products ranging from whole birds to deboned breast meat. As you well know, the natural moisture and the retained moisture must be determined for each category. This will require a vast amount of testing. In the minimization portion of the regulation, numerous microbial samples will be generated that will be beyond the available labs' capacities. Once the testing is completed, there will not be adequate time to get new packaging material produced nor time to use up existing packaging material to avoid huge capital losses. Furthermore, the packaging industry has said that they will not be able to fulfill the needs of the entire industry in the Southeast Region.

For these reasons, I feel that the requested extension be granted.

Sincerely,

*Ken Long*

Ken Long

Plant Manager, ConAgra Poultry Company – Canton, GA

