

mountaire®

CORPORATION

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November 13, 2001

Ms. Diane Moore
Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
300 12th Street, SW.
Room 102, Cotton Annex
Washington, DC 20250

136

01-030N
01-030N-136
Ronald M. Cameron

Re: [Docket No. 01-030N] "Retained Water in Raw Meat and Poultry Products;
Poultry Chilling Requirements"

Dear Ms. Moore,

As President of Mountaire Corporation, an integrated poultry company, I respectfully submit these comments in response to the Food Safety and Inspection Service (FSIS) Request for Comment on Industry Petition to Postpone the Effective Date of Regulations Limiting and Requiring Labeling for Retained Water in Raw Meat and Poultry Products.

I am disturbed with the short time period we have been given to comply with the new standards. By the time the poultry industry received sufficient information to begin compliance with these regulations, half of the twelve-month compliance time had already passed. We are willing to comply with these new regulations, but we need the time to do it, fairly and correctly, in a manner that allows the consumer and economy to remain stable.

Our industry does not have adequate time to implement the four stages needed to comply with this regulation. Protocol submission and review, data collection to validate unavoidable moisture absorption, data collection to obtain moisture retention for individual products, and the designing and packaging of new labels are steps that must be taken consecutively and not concurrently.

I would also like to voice my disagreement with the NCBA's assertion that this process has been "painfully slow". The process for the poultry industry did not begin until the rules were finalized. Prior to this, my company was not asked or directed to make any changes. So, in regards to the earlier statement by the NCBA, I would dissent and say the process is going painfully fast.



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The bottom line is that it's simply impossible for us to comply with this regulation by January 9, 2002. So I respectfully ask you to extend the effective date to August 1, 2004.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald M. Cameron". The signature is fluid and cursive, with the first name "Ronald" and last name "Cameron" clearly distinguishable.

Ronald M. Cameron
Chairman, CEO
Mountaire Corporation