



# Sanderson Farms, Inc.

GENERAL OFFICES

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Docket Clerk  
U.S. Department of Agriculture  
Food Safety and Inspection Service  
300 12<sup>th</sup> Street, SW  
Room 102 Cotton Annex  
Washington, D.C. 20250

01-030N  
01-030N-146  
James A. Grimes

Re: Docket Number 01-030N

Industry petition to postpone the effective date of regulations limiting and requiring Labeling for retained water in raw meat and poultry products

Gentlemen:

Please accept this letter in support of the above reference industry petition. Based on my understanding, the rule was published on January 9, 2001, and a meeting held in late February 2001 to address industry questions. By the time sample protocols were developed by industry, submitted for review and response received by industry, six months had elapsed.

Individuals poultry companies have now started the initial stages of testing to justify moisture pickup during the chilling process and testing of microbiological standards. As facilities now conduct salmonella testing, the need for additional salmonella testing facilities, whether corporate or public, will extend the time necessary to perform satisfactory testing by all companies. In addition, it would seem that seasonal variation of moisture pickup during the chilling process should also be considered. For consideration of this variable and in order to have the most accurate data, additional time is needed prior to implementation of the rule.

Lastly, once data has been collected, evaluated and decisions made, labeling or packaging changes must take place. As with any prepackaged products, product wrapped in preprinted film, consideration must be given to the time element to obtain new film from a limited number of suppliers. Industry estimates that it would take an additional six months for facilities to change over all necessary film.

Given all of the above, industry had not been given an acceptable timeframe to develop and implement the rule. In my opinion, it would be fair to delay implementation of the moisture rule for a period of 24 months. If implementation were not delayed, facilities would be forced to cease operation and deprive consumers' access to a nutritious and economical poultry products.

Yours truly,

James A. Grimes  
Corporate Controller