

WILLOW BROOK

FOODS

11/16/01

FSIS Docket Room, (Docket #01-030N)
U.S. Department of Agriculture
FSIS, Room 102, Cotton Annex
300 12th Street, SW
Washington, D.C., 20250-3700

148

01-030N
01-030N-148
Mary Alice Mallard

November 6, 2001

To Whom It May Concern;

The petition to postpone the effective date of the Retained Water in Raw Meat and Poultry Products: Poultry Chilling Requirements, is being considered at this time. As a member of the National Turkey Federation, we participated in the formation of this petition. FSIS gave the following questions to NTF.

1. Did FSIS allow sufficient time to prepare?

From our perspective, no. We were unable to determine, after the Omaha meeting in March, whether or not we needed a protocol if we were not changing Chilling procedures. Also, at that meeting we were told that product destined for further processing, would be labeled as such and not require testing. A protocol was submitted and rejected because reference was made to not being ready by the Jan. 2002 date. A new protocol has been submitted, but no response yet.

2. Is available laboratory capacity sufficient?

So far our in house laboratory has done well. The issue is getting product sampled from the cold weather time period as well as the warm weather.

3. Is there time to produce new labels?

The issue is the lead time needed to change printed film, labels, etc. That whole process is slow, **BUT BEFORE YOU START THAT PROCESS, YOU HAVE TO ARRIVE AT WHAT THE LABEL CHANGE NEEDS TO BE, IF ANY,** and then go through the change process.

WHAT WILL THE CRITERIA BE IN REGARDS TO EXISTING LABELS?

4. Would postponement be fair, etc.?

What will the agency do if the date isn't postponed? What is a company supposed to do with products to be made and existing labels in house and new labels not done because conclusions have not been made because moisture testing is not done?

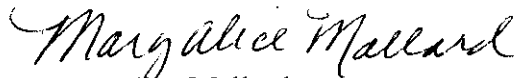


5 Would postponement effect the consumer?

Granting time to comply with the rule would not affect consumers.

Please consider the comments above. At this time Willow Brook Foods is conducting tests, however we are very concerned that the January 9, 2002 date will be here and we know that we will not be ready. If you have any questions about our comments, please feel free to call me at 417-829-3122. Thank you.

Regards,

A handwritten signature in cursive script that reads "Margalice Mallard".

Mary Alice Mallard
Quality Assurance Manager