



NEBRASKA TURKEY GROWERS COOPERATIVE

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November 7, 2001

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FSIS Docket Room
USDA/FSIS
Room 102, Cotton Annex
300 12th St. SW
Washington, DC 20250-3700

01-030N
01-030N-15
Joe Neesen

Re: Docket #01-030N

Gentlemen:

This letter is to support the request for postponement of the retained moisture regulation until August 1, 2004. Our support is based on the following:

1. The details and requirements of this regulation still need to be defined. Many questions have only recently been addressed with very significant questions still awaiting clarification.

With the massive amount of data FSIS is expecting the meat and poultry industries to generate, it only makes sense to be absolutely sure of all of the pertinent facts before expenses are applied to this task.

When we consider seasonality and the effects of weather on livestock and poultry, along with the concerns for age, feed variations, genetics and breed differences, and animal health, it is short-sighted to only focus on particular mechanical procedures a facility may have during the processing of these creatures. Industries don't have good data on how all these variables affect their product and certainly the question of how moisture retention is affected. This data collection should cover two years so all the variables can be considered and that they are statistically relevant.

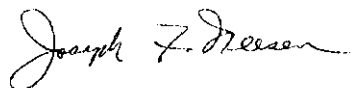
2. The question of laboratory availability to conduct moisture and pathogen analysis is a tremendous challenge. Once the data is generated and a processor is confident of the retained moisture levels, film suppliers will also have a heavy burden to modify all the printing plates necessary for the products involved. Turnaround time currently for printing plate changes can take up to two weeks just with normal business. With the multitude of changes this regulation requires, the actual label printing changes could take months.

3. Postponement of this regulation would not be unfair to anyone, nor would it affect consumers negatively. The goal should be to provide the most accurate information possible to the consumers.

General questions or comments for review:

1. How does a company with multiple plants producing the same product with different chilling systems and different retained moisture levels label a branded item. A company cannot have different retained moisture levels published on common packaging.
2. All single ingredient products directed for further processing should not be required to be labeled for retained moisture. Once the items enter the process of further processing, the retained moisture statement will be out of compliance and not beneficial to the further processor.
3. A standard of identity or a national retention retained moisture level for each species should be developed and all processors should be required to label as such. If a processor chooses to label less than the specie standard, they must develop a protocol and data to validate a lessor percent of retained moisture. This would save tremendous time and expense for both FSIS and the industries while accomplishing the same goal of informing the end users of our products.

Sincerely,



Joe Neesen
Plant Manager

SGJ/cbm