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01-030N  
01-030N-36  
Richard McDonald

Docket Clerk  
USDA Food Safety and Inspection Service  
Room 102, Cotton Annex  
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(36)

**Re: Docket No. 01-030N "Retained Water in Raw Meat and Poultry Products: Poultry Chilling Requirements" Industry Petition**

Texas Cattle Feeders Association (TCFA) appreciates the opportunity to comment on Docket No. 01-030N "Announcement of and 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".

TCFA represents cattle feeders in Texas, Oklahoma and New Mexico. In 2000, our members marketed more than seven million head of fed cattle—over 30% of the nation's supply. The proposed rule has significant economic implications for our members

TCFA strongly opposes any extension of time and a delay in implementing the label requirements for retained water in poultry products.

Five years have elapsed since this issue was raised with USDA by a petition from beef, pork and poultry producers filed in 1996. This effort followed a legal challenge from producers filed in 1994, which ultimately resulted in a court ruling in favor of developing new regulations. More than seven years have elapsed with no resolution of the inequity in USDA regulations that allow added water to poultry products but zero to beef. But now, three months from the deadline to implement new regulations to report added water to consumers, the poultry industry requests an extension of the deadline.

TCFA urges the administration to end this inequity and implement a regulation supported by science, fairness and court ruling.

Please call if we can provide additional information. We look forward to a fair resolution of this issue.

Sincerely,

*Richard McDonald*

Richard McDonald, PhD  
President & CEO