

FSIS Regulations

From: oldorchardemu@nfis.com
Sent: Monday, July 21, 2003 3:18 PM
To: FSIS Regulations
Subject: Attention FSIS Docket Clerk/Docekt No. 02-015DF, RIN 0583-AC97: Importing Ratite Products from Australia and New Zealand to U.S.

Importance: High

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02-015DF 02-015DF-10 James L. Royer Peggy L. Royer



ATT510055.htm (14
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Re: Importing ratite Products from Australia and new Zealand to the United States.

We are responding to the above proposal to lift import restrictions for ratites and ratite products from Australia and New Zealand. We are very much "against" doing this.

As American emu growers, we are struggling, like all American farmers at this time, to keep our business going. We raise our emu mainly for the anti-inflammatory qualities that the emu oil exhibits since it has oleic, linoleic and linolenic acids that are known to reduce inflammation and the deep penetrating quality it has. The emu meat is also a very healthy meat that is high in nutrition, low in fat and cholesterol. Our birds, like most American emu, are raised using no added antibiotics, growth hormones or animal by-products. The grain is purchased from a local farmers cooperative in Frederick, MD.

We, like most emu growers, are a farm to finish business. This means that we not only hatch the birds but, also, raise them, have them slaughtered, and have the emu oil refined. We then must find companies to further process the meat and oil into finished products. After all of this, we must wholesale and retail the finished products.

It is very important that we be able to sell our meat and meat products, our feathers and our eggs for a reasonable price in order to remain in business.

Australian emu oil is already undercutting American emu oil by one half or up to two thirds. Australian emu oil sells wholesale, for \$35-\$85 per gallon while American emu oil sells for \$125-\$160 per gallon. There is no way that American emu growers can compete with the low costs of raising emu in Australia. And there is currently some Australian emu oil that is of an inferior quality in the US that is harming the credibility of all emu oil.

Farmers in the United States deal with federal and state health departments, agriculture departments, increasing property taxes, high production costs, high overhead, low income, tough weather. Here in Maryland, some believe there is an effort to preserve agriculture through diversity and the emu industry in Maryland and the United States is definitely a diverse ag product. But if New Zealanders and Australians are allowed to bring their lower-cost emu oil and meat into the United States, we can kiss another aspect of agriculture good bye.

We hope you will reconsider the ruling to allow importation of ratite products into the US from Australia and New Zealand. All American ratite growers will be hurt enormously by passage of an Agreement to lift the import restrictions with Australia. Please reconsider and withdraw this rule.

Respectfully yours,

James L Royer /s/
Peggy L. Royer /s/