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FSIS Regulations

From: alhowe@mail.ev1.net
Sent: Monday, July 21, 2003 11:38 AM
Subject: Addition of Australia and New Zealand to the List of Foreign Countries Eligible to Import Poultry Products (Ratite Only) Into...

Department of Agriculture
Food Safety and Inspection Service

9 CFR Part 381

[Docket No. 02-015DF]

02-015DF-13
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Al Howe

RIN 0583-AC97
Addition of Australia and New Zealand to the List of Foreign Countries Eligible to Import Poultry Products (Ratite Only) Into the United States

Food Safety and Inspection Service, USDA
FISI Docket Clerk
Docket 02-015DF, Room 102
Cotton Annex, 300 C Street, SW.
Washington, DC 20250-3700

Gentlemen,

I am responding to the above proposal to lift import restrictions for ratites and ratite products from Australia and New Zealand. I am very much "AGAINST" doing this.

I represent, not only myself, but as President of the Texas Emu Association, almost a hundred emu ranchers in Texas.

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

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, have the hides tanned and have the emu oil refined. We then must find companies to further process the meat, hides 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 hides and leather products, our feathers and our eggs for a reasonable price in order to remain in business.

Unlike other poultry, the emu and ostrich takes upwards of a year or longer to be ready for marketing. That represents a considerable investment of time, money, and resources, all of which are in short supply to American farmers. We get no subsistence from the government. And now, our own government is going to essentially provide subsistence to the Australian and New Zealand producers by opening the American market to them. They already get subsistence from their governments.

Australian emu oil is already undercutting American emu oil by one half 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 being marketed in the United States that is of such an inferior quality that it is harming the credibility of all emu oil.

We have worked with the USDA, FDA, state and national Farm Bureaus, state departments of agriculture, colleges and universities, and state and federal governments to enact legislation for the safety, control and regulation of ratite processing and marketing. We are currently working with the USDA in getting legislation written to cover ratites in the GIPSA. We are doing everything we can to ensure our production and processing facilities are following established rules and regulations, not only to produce a superior product, but to ensure the American public, which buys the products, are receive a safe and wholesome product. The importation of Australian and New Zealand products serverly undermines all these efforts.

All American ratite growers (emu and ostrich) will be hurt enormously by passage of an Agreement to lift the import restrictions with Australia and New Zealand. Please reconsider and withdraw this rule.

Respectfully yours,

Al Howe /s/
President
Texas Emu Association
Emu Rancher

Sent via the EV1 webmail system at mail.ev1.net