

DEPARTMENT OF AGRICULTURE  
Food Safety and Inspection Service



02-015DF  
02-015DF-6  
David, Diane & Allison  
Brown

July 21, 2003

9 CFR Part 381

[Docket No. 02-015DF]

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  
FSIS Docket Clerk  
Docket 02-015DF, Room 102  
Cotton Annex, 300 C Street, SW.  
Washington, DC 20250-3700

Gentlemen:

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.

Like most emu growers, we are a 'farm to finish' business. This means that we not only hatch the birds but, 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.

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.

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,  
David E. Brown/s/  
American emu grower

Diane Brown/s/  
American emu grower

Alison Brown/s/  
American emu grower

**Carlhaven Emu Farm  
David, Diane, and Alison Brown  
12835 Hall Shop Rd., Highland, MD 20777**

In opposition to the above, please include my attached letter. Thank you.

David, Diane & Alison Brown  
Carlhaven Emu Farm  
12835 Hall Shop Rd.  
Highland, MD 20777