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April 5, 2022

Directed to:

FSIS Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
Room 2534, South Building
1400 Independence Ave SW
Washington, DC 20250

Compiled and Submitted by:

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Re: Petition for Policy Change including amendment of Part 381.1 Definitions: *Ready to Cook Poultry*, and clarification added to 9 CFR 381.76(b)(2)(ii)

Northern Goose Processors Ltd. respectfully submits the following petition to amend regulations implementing the Poultry Products Inspection Regulations proposed definition of *Ready to Cook Poultry* [9 CFR 381.1] (eCFR Regulations) and in relation to the following regulation [9CFR 381.76 *Post Mortem inspection under Traditional Inspection, the Streamlined Inspection (SIS), the New Line Speed (NELS) Inspection System, the New Poultry Inspection System (NPIS), the New Turkey Inspection System (NTI), and Ratite Inspection* (eCFR F. R.)], with specific focus on Post Mortem Inspection under Traditional Inspection Systems.

Existing Regulation for Amendment

9 CFR 381.1 Ready-to-cook poultry- means any slaughtered poultry free from protruding pinfeathers and vestigial feathers (hair or down), from which the head, feet, crop, oil gland, trachea, esophagus, entrails and lungs have been removed, and from which the mature reproductive organs and kidneys may have been removed, and with or without the giblets, and which is suitable for cooking without need of further processing. Ready to cook poultry also means any cut-up or disjointed portion of poultry or other parts of poultry such as reproductive organs, head, or feet that are suitable for cooking without need of further processing. (eCFR Regulations)

Amending the definition of ready to cook poultry would not sacrifice the integrity of food safety measures implemented in North American food safety policies. Furthermore, such an update to the regulatory definition and proposed protocol would not require amendments to the regulations listed below.





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(eCFR F. R.) **9 CFR 381.76 (a)** *A post-mortem inspection shall be made on a bird-by-bird basis on all poultry eviscerated in every official establishment. Each carcass, or all parts comprising such carcass, must be examined by an inspector, except for parts that are not needed for inspection purposes and are not intended for human food and are condemned. Each carcass eviscerated shall be prepared as ready-to-cook-poultry.*

(eCFR C. o.) **21USC 464 (a) (3)** *persons slaughtering, processing, or otherwise handling poultry or poultry products which have been or are to be processed as required by recognized religious dietary laws, to the extent that the Secretary determines necessary to avoid conflict with such requirements while still effectuating the purposes of this chapter.*

Requested Action

Northern Goose Processors requests that USDA, Food Safety and Inspection Service (FSIS) amend their proposed definition of *Ready to Cook Poultry* by adding an appropriate subsection, describing how *other parts* of poultry, listed in the stated definition, may remain intact as a partially dressed carcass and meet the requirements to be labelled with the mark of inspection, provided such poultry uphold the standards stated in the current *21 USC. S.455 (a)(b)(c)* (Office U. G., 21 USC 455(a)(b)(c) Inspection in official establishments, 2014). Proposed amended regulations are as follows:

9 CFR 381.1- proposed amendment

- (1) *Ready to Cook Poultry means any slaughtered poultry (a) free from protruding pinfeathers and vestigial feathers (hair or down); (b) eviscerated [trachea, esophagus, crop, oil gland, entrails, and lungs are removed], (c) head, and feet at the tarsal joint are removed, (d) and from which the mature reproductive organs and kidneys may have been removed, (e) and with or without the giblets, and which is suitable for cooking without need of further processing.*

Ready to cook poultry also means any cut-up or disjointed portion of poultry or other parts of poultry, such as reproductive organs, heads or feet that are suitable for cooking without need of further processing.

- (2) *Despite subsection 1 and at the request of an eligible establishment, the Secretary may authorize partial dressing of a carcass if (a) license holder establishes that there is a market for partially dressed carcasses; and (b) the license holder's procedure for partially dressed carcasses is such that the carcass is sufficiently dressed to enable and maintain the integrity of a post-mortem examination or inspection.*

This proposed amendment also relates to the *FSIS Directive 6100.3 Rev 1. Ante-Mortem and Post-Mortem Poultry Inspection, Section V. Post-Mortem Inspection Part A (2)*. (USDA, FSIS Directive 6100.3 Rev 1, 2019). Correlating instructions for Public Health Veterinarians (PHVs) and Inspection Program Personnel (IPPs) would require revision to include procedures to facilitate adequate product inspections with the presence of the head, detecting contamination, adulteration, pathology, or





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otherwise substandard condition, compliant with standard procedures for performing post-mortem inspections included in the directive listed previously.

Statement of Interest

Northern Goose Processors Ltd is a federally inspected facility in Teulon, Manitoba, 100 miles north of the CANADA-USA border, operating under the assignment of Establishment 063. Northern Goose has been HACCP certified and federally inspected since 2018, also listed as an eligible place certified to export meat and poultry products to the United States, since August 2019. [See Appendix 1]. The establishment was first opened in 1976, processing and distributing hundreds of thousands of geese globally, until it ceased production in 2008 and changed ownership in 2013. When Northern Goose Processors began its new ownership, it came at a cost. The plant infrastructure was outdated for modern food safety standards, the machinery and equipment had been sitting dormant and unused for years, and there were only a few staff members employed to run a 50 000 ft² food manufacturing plant. The new owners and investors of Northern Goose saw potential; the potential to build up this empty, quiet building to the busy and bustling facility that it could be, while being influential for the rural farming community it's nestled in. The existing infrastructure underwent extensive modifications and renovations to streamline processes and ensure compliance with modern food safety standards.

Northern Goose began specializing in the production of Chinese Geese (*Anser cygnoides*) also known as the White Chinese Swan Goose. The establishment is the only known federally inspected facility in North America to process this unique species. Our flagship product, the Chinese Young Goose is processed with the head and neck remaining in-tact. The distinct breed and processing method is highly prized and sought after by ethnic restaurants, distributors and supermarkets serving citizens who, culturally, cook and consume goose as a significant centerpiece of their meal.

In the four years since the facility has been federally inspected, the introduction of the *Chinese Young Goose with Head* to the food industry has been positive. Northern Goose has begun to sell our leading product to restaurants and distributors both domestically, and internationally, having endorsed product for export to Singapore, Japan, and Hong Kong. We've now established product recognition with some foreign customers as well as in two of Canada's cultural hubs, Vancouver, and Toronto. Most recently, Northern Goose and its partners have received various inquiries and requests for our flagship product, the *Chinese Young Goose with Head*, from American restaurants and distribution companies.

After enduring some of the initial growing pains of starting a food manufacturing operation, then experiencing the turbulent months of operating during a global pandemic, our company is quickly approaching our sixth operational processing season. This is a critical time for the success of any business, and in order to sustain the many challenges, modifications, and economic hardships that food producers and farmers, processors, like ourselves, and the numerous restaurants-many of whom are rebuilding after repeated closures- continue to face, our product's approval for export into the USA





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is essential in contributing to the renewal and growth for these customers, their businesses, and the businesses within our agriculture community.

Current FSIS regulations: Problem Petition is Intended to Address

In Canada, the Canadian Food Inspection Agency (CFIA) regulates the production of all poultry and meat products and does not recognize specific dressing procedures prescribed to a religion. CFIA supervises any ritual slaughter within an establishment to verify compliance to animal welfare and humane handling regulations. [SFCR Part 6, Division 7, Subdivision E, Section 140-144]. Acceptance as inspected product is based on the effectiveness of the preventive control plan (PCP), HACCP systems and conformance to labelling the product to prevent misbranding or the use of misleading verbiage to describe a food product, similar to the foundation principles of all food safety regulations, including concepts upheld by the Poultry Product Inspection Regulations. One vital difference in food regulations of international trade partners, Canada, and USA, is that FSIS doesn't recognize a poultry product with the head remaining intact as a product eligible to bear the mark of inspection.

*In addition, poultry carcasses with heads or feet intact are not eligible to bear the marks of inspection because they do not meet the ready-to-cook definition (9 CFR 381.1), which requires removal of the head and feet. [FSIS Directive 6030.1 Rev 2: Section V, Part A(1)(b)]
(USDA, FSIS Directive 6030.1 Rev 2, 2021)*

Northern Goose has applied to the USDA Office of Policy and Program Development (OPPD) Labeling and Program Delivery Staff for approval of the Chinese Young Goose with Head. Due to the fact that the head remains in-tact on the final product and there is no current regulation under inspection criteria, our flagship product was defaulted to the exempt product category. Furthermore, to meet the requirements of exempt product, an establishment must perform the religious rituals and techniques prescribed by a religion for a dietary requirement, with permission and endorsement by the religious authority. The regulation states:

[21USC 464(a)(3)] (eCFR C. o.) persons slaughtering, processing, or otherwise handling poultry or poultry products which have been or are to be processed as required by recognized religious dietary laws, to the extent that the Secretary determines necessary to avoid conflict with such requirements while still effectuating the purposes of this chapter.

The exemption regulation was developed to accommodate the variation in religious dietary requirements for US citizens and diversify the availability of speciality products in the supply chain. Religious exemptions were implemented to prevent conflict between government regulation and religious association requirements. [FSIS Directive 6030.1 Rev 2] (USDA, FSIS Directive 6030.1 Rev 2, 2021). Recognized religious dietary laws which have been previously approved under the provisions of PPIA are as follows:





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- 1) Buddhist Style to process in accordance with the Buddhist religion, requiring poultry to be eviscerated, with the head and feet intact
- 2) Confucius Style to process in accordance with the Confucian religion, requiring poultry to be noneviscerated, with head and feet intact
- 3) Halal Style to process in accordance with Islamic (or Halal) religious beliefs, requiring poultry to be eviscerated, with head intact and with or without feet in-tact
- 4) Kosher Style to process in accordance with Judaic (or Kosher) religious beliefs, requiring poultry to be eviscerated, with head and feet intact

C. Products that meet all inspection requirements and bear the marks of inspection are not religious exempt products. There is no need for a religious exempt certificate when products with label claims including "Halal," "Kosher," or another claim, bear the marks of inspection.

D. Any poultry products produced under a religious exemption cannot ever bear the marks of inspection. This includes any parts produced from religious exempt carcasses.

The Chinese Young Goose with Head meets the physical description for Halal and Kosher, and potentially Buddhist Style exempt product, but labelling our product with these exemptions could be misleading. The intention of the product is often misinterpreted as specific to China and Chinese citizens or confused with products containing the use of such terms as *Chinese Style* or *Asian Style*. Our specialty goose, the Chinese Young Goose, is a distinct breed, comparable to Muscovy Duck, Silkie Chicken, Berkshire Pork, or Angus Beef. (Association, n.d.) [*Breeds & Varieties- American Poultry Association, Accepted Breeds*]. The generalized definition of *Chinese Style* refers to the use of soy sauce flavouring, grain alcohol and a sweetener such as sugar or honey, this paired with general consumer unfamiliarity with goose breeds has contributed to the aforementioned assumptions and categorizations of our product (Office of Policy Program and Employee Development, 2005).

Instead, the intention of our product caters to Asian culture, a flavour profile derived from a fusion of 48 Asian-Pacific countries, not exclusively China. The product goal is to provide a variety of preferred food fusions for people who practice, share and wish to experience this culture. Labelling our product as a religious exempt product would be false, and wouldn't abide by the public policy's intention, to provide clear and comprehensive labelling, informing and educating consumers about the food they're purchasing. The label of *Chinese Young Goose with Head* is intended to reflect the product inside the packaging as accurately as possible, describing the age of the birds (young vs mature), breed claim (Chinese Goose) and a qualifier to describe the product if it differs from the standardized common name, (with head).

(Regulations, 9 CFR 381.79, 2022) 9 CFR 381.79 States that- *Each carcass and all organs and other parts of carcasses which are found to be not adulterated shall be passed for human food.*

Despite consumer preference of keeping the head intact, if the head were removed from the carcass, keeping the neck intact, the carcass with neck would be accepted and approved as inspected product,





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and the heads would be accepted as inspected product under the definition of *poultry products*. When separated, these products are acceptable to export to the US. When the only thing that changes about the process is that the head remains intact, this is not an eligible product, regardless of whether it meets the requirements for microbial and pathogen sampling and verification. [See **Appendix 1: Temporary and Approved USDA product; HACCP Form 3- Process Flow Diagram- NG, USDA Approval**]

Global food safety regulations and supply change demands have influenced HACCP modifications since its implementation circa 1996, to accommodate regional dietary preferences and the rise of specialty food production. Popularity of many variety meats which were previously viewed as inedible, has drastically increased in recent years due to population growth and consumer preference. (Agriculture, Where's the (Not) Meat?, 2011) [USDA Report from Economic Research Service]. With the diversification of residents within the North American population, the demand for various products like, the Chinese Young Goose with head, has also increased.

Our goose is processed to accommodate consumer preferences and facilitate traditional cooking methods. Our intention is not to dispute, challenge or question the justification, necessity or validity of religious exemptions for product produced to cater to the Buddhist, Jewish, Islamic or Confucius religious followers. Instead, we wish to accurately reflect the nature and intention of our product through production to commerce in the process of obtaining eligibility for distribution in the American market.

Discussion:

Compliance with Existing Regulations

The USDA Food Safety Inspection Service has established regulations describing the performance of post-mortem inspections for all meat commodities. The post-mortem examination specific to poultry, (USDA, FSIS Directive 6100.3 Rev 1, 2019) does not include the evaluation of the head. As a Canadian establishment, Northern Goose is obligated to perform to standards of post-mortem inspection described in the Safe Food for Canadians Regulations, as follows (Canada G. o., 2019):

SFCR Part 6, Division 7, Subdivision F 145 (1) After a food animal is bled, a licence holder must dress the carcass by doing the following:

(b) in the case of the carcass of a bird,

(i) remove the feathers and hair or remove the skin,

(ii) remove the head, uropygial gland and feet at the tarsal joints, and

(iii) eviscerate it.

(2) Despite subsection (1) and at the request of the licence holder, the Minister must authorize the licence holder to partially dress a carcass if

(a) the licence holder establishes that there is a market for partially dressed carcasses; and

(b) the licence holder's procedure for partial dressing is such that the carcass is sufficiently dressed to enable a post-mortem examination or inspection.





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SFCR Part 6, Division 7, Subdivision F 150 (1) During the course of dressing or partially dressing a carcass, a licence holder who is authorized to conduct a post-mortem examination program under subsection 160(3) must, under the supervision of a veterinary inspector, conduct a post-mortem examination of the carcass, its parts and the blood of the food animal that has been collected to be processed as an edible meat product.

With demonstrated compliance to these current Canadian Regulations, the integrity of the following FSIS regulations would not be compromised or disputed. (Office U. G., 21 USC 455(a)(b)(c) Inspection in official establishments, 2014)

21 USC S. 455 Inspection in official establishments

(a) Ante Mortem Inspection

For the purpose of preventing entry into or flow or movement in commerce of, or the burdening of commerce by, and poultry product which is capable of use as human food and is adulterated, the Secretary shall, where and to the extent considered by him necessary, cause to be made by inspectors at ante mortem inspection of poultry in each official establishment processing poultry or poultry products for commerce or otherwise subject to inspection under this chapter.

(b) Post-Mortem Inspection

The Secretary, whenever processing operations are being conducted, shall cause to be made by inspectors' post-mortem inspection of the carcass of each bird processed, and at any time such quarantine, segregation, and reinspection as he deems necessary of poultry and poultry products capable of use as human food in each official establishment processing such poultry or poultry products for commerce or otherwise subject to inspection under this chapter.

Post-mortem Inspection Criteria for Alternate Commodities

The post-mortem inspection criteria for other commodities such as beef, lamb, goat, and sheep include a specific inspection for the head of each carcass, although these commodities vary drastically from poultry anatomy and physiology, there is a process to evaluate the head during post-mortem inspection to allow processors to harvest meat from the head, while avoiding any SRM [(Regulations, 9CFR 310.22 Specified risk materials from cattle and their handling and disposition, 2022) specified risk materials 310.22]. Post-mortem inspections for ruminants are very similar to swine, although one species is a ruminant while the other is monogastric, each species has differing anatomy, there is a defined post-mortem evaluation prescribed for the inspection of the head of swine by IPP (Inspection Program Personnel). [Swine Post-Mortem reference *FSIS Directive 6100.2 Rev 1*; (Agriculture, Post-mortem Livestock Inspection, 2016)]

A commonality of all post-mortem inspections is if there is detected pathology or contamination, the product is condemned, prevent unwholesome, adulterated, or misbranded products from entering





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commerce as defined below in 21USC:10 CFR S. 451. (Office U. G., 21 USC S.451 Congressional statement of findings, 2014)

21 USC 10 CFR S.451 Congressional Statement of Findings

Poultry and poultry products are an important source of the Nation's total supply of food. They are consumed throughout the nation and the major portion thereof moves in interstate of foreign commerce. It is essential in the public interest that the health and welfare of consumers be protected by assuring that poultry products distributed to them are wholesome, not adulterated, and properly marked, labeled, and packaged. Unwholesome, adulterated, or misbranded poultry products impair the effective regulation of poultry products in interstate or foreign commers, are injurious to the public welfare, destroy markets for wholesome, not adulterated, and properly labelled and packed poultry products, and result in sundry losses to poultry producers and processors of poultry and poultry products, as well as injury to consumers.

Food Product Requirements: USDA Definitions- (Regulations, 21 USC 9CFR 301.2) (Office U. S., 21 USC 9 S. 453, 2014)

21USC CFR 9 S 301.2 Inedible. *Adulterated, uninspected, or not intended for use as human food.*

Safe Food for Canadians Part 6, Division 7, Section 125 Edible Meat Products-
Identification of meat product as edible

125(1) *A license holder may identify a meat product as edible only if*

- (a) The food animal from which the meat product is derived, or a sample from the shipment that the food animal is part of, is subjected to an ante-mortem examination under section 138;*
- (b) The food animal, other than a game animal, from which the meat product is derived, or a sample from the shipment that the food animal is part of, is subjected to an ante-mortem inspection under section 139*
- (c) The carcass of the food animal from which the meat product is derived is dressed or partially dressed;*
- (d) The carcass, its parts and the blood of the food animal from which the meat product is derived are subjected to a post-mortem inspection under subsection 149(1) or a post-mortem examination under subsection 150(1); and*
- (e) The meat is edible and is not contaminated, including that it does not contain any specified risk material*

Establishment 063-Canada has been federally inspected since 2018. All product moving through our process is inspected with an ante mortem inspection performed by trained personnel on site and verified by our in-house inspectors (IIC/IPP) and our veterinarian (VIC/PHV). Our product has been processed since 2018 with the head intact and has been labelled under Canadian regulations as





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meeting the requirements and food safety standards for inspected meat products intended for human consumption.

21USC Title 21. S.453 Adulterated- shall apply to any poultry product under one or more of the following circumstances

(1) if it bears or contains any poisonous or deleterious substance which may render it injurious to health; but in case the substance is not an added substance, such article shall not be considered adulterated under this clause if the quantity of such substance in or on such article does not ordinarily render it injurious to health.

(2)(A)if it bears or contains (by reason of administration of any substance to the live poultry or otherwise) any added poisonous or added deleterious substance (other than one which is (i) a pesticide chemical in or on a raw agricultural commodity; (ii) a food additive; or (iii) a color additive) which may, in the judgment of the Secretary, make such article unfit for human food;
(B)if it is, in whole or in part, a raw agricultural commodity and such commodity bears or contains a pesticide chemical which is unsafe within the meaning of section 346a of this title;

(C)if it bears or contains any food additive which is unsafe within the meaning of section 348 of this title;

(D)if it bears or contains any color additive which is unsafe within the meaning of section 379e of this title: Provided, That an article which is not otherwise deemed adulterated under clause (B), (C), or (D) shall nevertheless be deemed adulterated if use of the pesticide chemical, food additive, or color additive in or on such article is prohibited by regulations of the Secretary in official establishments;

(3)if it consists in whole or in part of any filthy, putrid, or decomposed substance or is for any other reason unsound, unhealthful, unwholesome, or otherwise unfit for human food;

(4) if it has been prepared, packed, or held under insanitary conditions whereby it may have become contaminated with filth, or whereby it may have been rendered injurious to health;

(5) if it is, in whole or in part, the product of any poultry which has died otherwise than by slaughter;

(6) if its container is composed, in whole or in part, of any poisonous or deleterious substance which may render the contents injurious to health;

(7) if it has been intentionally subjected to radiation, unless the use of the radiation was in conformity with a regulation or exemption in effect pursuant to section 348 of this title;

(8) if any valuable constituent has been in whole or in part omitted or abstracted therefrom; or if any substance has been substituted, wholly or in part therefor; or if damage or inferiority has been concealed in any manner; or if any substance has been added thereto or mixed or packed therewith so as to increase its bulk or weight, or reduce its quality or strength, or make it appear better or of greater value than it is.

All geese scheduled for processing at Northern Goose are received with the associated Flock Health Reporting Form. Any pharmaceutical administrations are declared on the Flock Sheet, approved producers of Est #063 are required to obtain approval from the establishment through individual or communication through veterinary professionals, prior to administering to flock. Canadian law forbids





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the potential of pharmaceutical residue in meat products sold to consumers. CFIA also performs chemical residual testing at a predetermined frequency using random selection. Northern goose does not add substances in any volume to our finished product. The site also maintains Food Defence and Site Security standard operating procedures.

Establishment 063 operates a Traditional Processing Line with a maximum line speed of 600 birds per hour. Our line is monitored for each slaughter by a CFIA Inspector stationed at the post-mortem inspection point, detecting contamination, pathology, and other undesirable food safety concerns. The head of the bird is not removed, herewith the carcass is inspected in its entirety, including the head and feet of the bird. Northern Goose packages its own product in the same inspected facility, our whole carcasses are not co-packed and do not leave the site as an unfinished product. CFIA monitors the packaging operations daily when in production. Est. 063 is also certified to perform grading services, with CFIA Grading Verification performed by a trained IIC (IPP), annually to verify our adherence to grading regulations with attention to the head and neck inspections by the trained individuals on-site. Northern Goose has a standard of practice to segregate and verify quantity of birds which are dead on arrival or appear to be unhealthy, displaying adverse behaviours or found dead in cages. No carcass suspected of any condition is processed with standard product. DOA's are segregated until they can be disposed of accordingly.

The regulation below supports the foundation of clearly labelling a food product for its origins, processing method and relevant product information without fabricating information regarding the product. Applying a religious exemption to our label does not align with the intention of our product, and would result in questionable compliance to the regulations indicated in bold. (eCFR C. o., 2022)

21USC Title 21. S.453 Misbranded: *The term "misbranded" shall apply to any poultry product under one or more of the following circumstances:*

- (1) if its labeling is false or misleading in any particular;**
- (2) if it is offered for sale under the name of another food;**
- (3) if it is an imitation of another food, unless its label bears, in type of uniform size and prominence, the word "imitation" and immediately thereafter, the name of the food imitated;*
- (4) if its container is so made, formed, or filled as to be misleading;*
- (5) unless it bears a label showing (A) the name and the place of business of the manufacturer, packer, or distributor; and (B) an accurate statement of the quantity of the product in terms of weight, measure, or numerical count: Provided, That under clause (B) of this subparagraph (5), reasonable variations may be permitted, and exemptions as to small packages or articles not in packages or other containers may be established by regulations prescribed by the Secretary;*
- (6) if any word, statement, or other information required by or under authority of this chapter to appear on the label or other labeling is not prominently placed thereon with such conspicuousness (as compared with other words, statements, designs, or devices, in the labeling) and in such terms as to*





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render it likely to be read and understood by the ordinary individual under customary conditions of purchase and use;

(7) if it purports to be or is represented as a food for which a definition and standard of identity or composition has been prescribed by regulations of the Secretary under section 457 of this title unless (A) it conforms to such definition and standard, and (B) its label bears the name of the food specified in the definition and standard and, insofar as may be required by such regulations, the common names of optional ingredients (other than spices, flavoring, and coloring) present in such food;

(8) if it purports to be or is represented as a food for which a standard or standards of fill of container have been prescribed by regulations of the Secretary under section 457 of this title, and it falls below the standard of fill of container applicable thereto, unless its label bears, in such manner and form as such regulations specify, a statement that it falls below such standard;

(9) if it is not subject to the provisions of subparagraph (7), unless its label bears (A) the common or usual name of the food, if any there be, and (B) in case it is fabricated from two or more ingredients, the common or usual name of each such ingredient; except that spices, flavorings, and colorings may, when authorized by the Secretary, be designated as spices, flavorings, and colorings without naming each: Provided, That to the extent that compliance with the requirements of clause (B) of this subparagraph (9) is impracticable or results in deception or unfair competition, exemptions shall be established by regulations promulgated by the Secretary;

(10) if it purports to be or is represented for special dietary uses unless its label bears such information concerning its vitamin, mineral, and other dietary properties as the Secretary, after consultation with the Secretary of Health and Human Services, determines to be, and by regulations prescribes as, necessary in order fully to inform purchasers as to its value for such uses;

(11) if it bears or contains any artificial flavoring, artificial coloring, or chemical preservative unless it bears labeling stating that fact: Provided, That, to the extent that compliance with the requirements of this subparagraph (11) is impracticable, exemptions shall be established by regulations promulgated by the Secretary; or

(12) if it fails to bear on its containers, and in the case of non-consumer packaged carcasses (if the Secretary so requires) directly thereon, as the Secretary may by regulations prescribe, the official inspection legend and official establishment number of the establishment where the article was processed, and, unrestricted by any of the foregoing, such other information as the Secretary may require in such regulations to assure that it will not have false or misleading labeling and that the public will be informed of the manner of handling required to maintain the article in a wholesome condition.

Safe Food for Canadians Regulations

SFCR Part 11 Division 1 Subdivision A Section 199 (1) For the purposes of subsection 6(1) of the Act, labelling a food in a manner that is false, misleading or deceptive or is likely to create an erroneous impression includes a food with





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- (a) *any representation in which expressions, words, figures, depictions or symbols are used, arranged or shown in a manner that may reasonably be considered to qualify the declared net quantity of a consumer prepackaged food or that is likely to deceive with respect to the net quantity or consumer prepackaged food; or*
- (b) *any expression, word, figure, depiction or symbol that may reasonably be considered to imply that a consumer prepackaged food contains any matter that it does not in fact contain or that it does not contain any matter that it does in fact contain.*

Under these definitions, labelling our product with the common name attached to breed claim and the addition of a qualifier to create, Chinese Young Goose with Head, is the name which best describes the status of the product in the package for consumers. By declining to use a label claim with a religious associated exemption, we are attempting to protect the integrity and intention of the product, which is to cater to a cultural desire for traditional style meat product. This supported by (Office U. S., S. 457 Labelling and Container Standards, 2014)

21USC 10 S. 457 (c) *Use of trade names; false or misleading marking or labelling; misleading form or size of container. No article subject to this chapter shall be sold or offered for sale by any person in commerce, under any name or other marking or labeling which is false or misleading, or in any container of a misleading form or size, but established trade names and other marking and labelling and containers which are not false or misleading and which are approved by the Secretary are permitted.*

Safe Food for Canadians Regulations Part 11 Division 1 Subdivision B Section 201

201 *A food, whether prepackaged or not, that is sent or conveyed from one province to another of that is imported or exported, and whose label bears a common name printed in boldface type, but not in italics, in the Standards of Identity Document must meet any standard that applies in respect of that common name.*

Chinese Goose Origin- Breed Claim

The Chinese Goose- *Anser cygnoides*- originated in China but also has a rich history in the US and Canada, with the early records of the Chinese Goose in America dating back to George Washington, who received a pair of Chinese Geese from Governor Morris in 1788. However, the Chinese Goose was not admitted to the American Standard of Perfection until 1874. (Association, n.d.) Our *mother flock* originated in the 1980's when the Canadian Government conducted a breed study comprised of various types of waterfowl. When the study concluded, the flock of Chinese Geese was acquired by farmer and processor, Everspring Farms, located in Ontario, Canada. (Gunder, 2004). Everspring Farms worked with Asian investors from Toronto to perfect the production process over the last 30 years. Northern Goose procured its own breeder flocks and is heavily involved in egg incubation, hatch, and placement activities, making the company nearly fully vertically integrated. Goslings from the Chinese Geese are placed at farms approved to produce for Northern Goose and are visually





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distinguishable upon observation due to species specific characteristics, some characteristics appear later such as the basal knob, appearing after 12 weeks, or the appearance of blue eyes.

Goose- Significant Meal Choice

Asia is the largest continent in the world, consisting of over half the world's population. In Asian-Pacific cultures the goose is a common centerpiece of special meals, signifying marital fidelity, bounty, and good fortune from top to bottom. Goose was historically consumed during winter months due to the maturity and plumpness of the birds at that time of year and the goose is particular staple for Chinese New Year celebrations, when knives are banned from the kitchen as bad luck. In Asian cultures, everything must have a beginning and an end, and geese are particularly special because they can only live in a clean environment. Keeping the head on the bird was a way to show consumers exactly what they were buying, to prevent food fraud. When consumers have the ability to see the bird in its entirety, it allows them to verify the health and species of the bird, based on the length of the neck (shorter neck of a duck whereas the goose has a longer, slender neck), and appearance of the head, like the Chinese Goose (white and brown varieties) with the prominent basal knob, it allows them to be confident and comfortable making food choices. This specialty was often cooked for family and friends at celebrations but has transformed into a coveted street-food and family meal. Goose in the Asian market is a centerpiece for the Culinary Tourism industry, highlighting the customary preparation and presentation.

Market Development in Canada

Everspring farms began breeding and processing the Chinese Goose at their then-family run processing plant. Southern Ontario is known as a cultural melting pot, being home to many Asian Canadians. In 2001, 72% of all Chinese Canadians lived in the urban centers of Toronto, Ontario or Vancouver, British Columbia. [(Canada S. , 2007)]. As the product popularity grew, customers were requesting that the goose be processed with the head and neck intact, paying homage to their traditional, cultural cooking methods. Everspring refined their process to accommodate the market demand from the late 1980's to early 2000's under Provincial Inspection criteria (Canadian equivalent of State Inspection). The Chinese Goose with Head was a product Asian Canadians sought out from the market because of its origins from the Eastern side of the globe and its relation to the practiced, traditional preparation to improve the culinary experience. This particular goose was what many individuals grew up eating with family during celebrations or gatherings.

Diverse Population Growth: Global and USA

The population of the US is the highest of all countries in North America, with over 327 million citizens. Studies show that Asian Americans are the fastest growing ethnic group in the U.S., making up 6% of the total American population (approx. 18.6 million people). The Asian population grew by 81% from 2000 to 2019. [(Abby Budiman, 2021) *Pew Research Center analysis of US Census Bureau: Populations estimates*]. In addition to the increase in Asian Americans, the Asian population has become geographically diverse with substantial growth in states like North Dakota, South Dakota,





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Texas, North Carolina, and Indiana. In addition to Asians of single race, an additional 3.5 million people identify as mixed-race Asian, making up more than 25% of all mixed-race people in the United States. [US Census: Inside the Diverse and Growing Asian Population- New York Times (Robert Gebeloff, 2021)]. The data demonstrates that North American, specifically American and Canadian populations are becoming more culturally diverse with the growth and integration of Asian communities and urban centers.

Cultural Food Preferences, Regional and Religious Dietary Requirements

"In order to live in a globalized world, it is necessary to understand the language, culture, and lifestyle of other country-partners. Food and its consumption culture is one of the most important factors associated with the unique culture of various ethnic groups or nations." [(Ki-Chang Name, 2010) *Meat Science Volume 86 Issue 1, 2010, Pages 95-102*]

Some of the religions practiced in Asian ancestry are Judaism, Hinduism, Taoism, Shintoism, Zoroastrianism, Buddhism, Jainism, Christianity, Islam, Sikhism, and the Baha'i Faith. Asia is the biggest continent in the world and includes 48 countries, which can be further subdivided into five separate regions based on their topographical properties. [Ref: (World, 2022) *Countries of the World*]. The population growth in both Canada and the US, specifically in Asian communities, has influenced food preferences of consumers and the market demand for specialty items.

Of approximately 18.6 million Asian-identifying US citizens, 42% identified as following the Christian religion, and 26% of those individuals did not identify with any affiliated religion. Stats Canada performed a study on the religious affiliation of Asian Canadians, in 2001 56% of these individuals declared they had no religious affiliation, while 14% were Buddhist. (Center, 2012)

This data set allows us to see market potential for consumers requesting foods suited to their religious dietary beliefs, like Buddhism and Halal (Islamic), but it also demonstrates there are a vast majority of citizens who make food choices based on cultural food preferences and traditional preparation methods. These concepts can play an important role in representing current and projecting future consumer food trends.

A product, like ours, may appeal to customers affiliated with a particular religion, but by labelling it as compliant for a specific religion, it leads to the exclusion of the millions of Asian Americans who want the product because it appeals to their cultural familiarity. What were once-regional flavours are now prepared and experienced globally, understanding the cultural influence of other countries and integration of ethnic foods in diverse populations, relies on the understanding of the rituals contributing to consumption habits.

"Food consumption habits and styles but also food preparation methods, tool development for raw materials, harvesting and preservation as well as preparation of food dishes which are influenced by geographical localization, climatic conditions and abundance of the fauna and flora. Food Preparation, trade and consumption have become leading factors shaping human behavior and developing a way of doing things that created tradition which has been passed from generation to generation making it unique for almost every human niche on the surface of the globe."





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"The components of the food culture include such activities as the methods of obtaining, processing, and preparation of the raw materials, cooking techniques, setting dishes and tables, and eating habits. Since the food culture is an integral part of the history of the particular country the knowledge about the food culture allows a better understanding of the people, culture, and tradition." [(Ki-Chang Name, 2010) Meat Science Volume 86 Issue 1, 2010, Pages 95-102]

Cultural traditions, preferences and resources have a direct effect on foods and cooking styles associated with specific ethnicities and regions of the world. With the integration of various ethnicities and cultures in North America, more food service establishments and retail outlets are offering ethnic specialities to cater to the demand dictated by the diversity of their clientele. Currently, consumers looking for this culturally specific product are either looking to experience new flavours and tastes, or to relive or continue a tradition they've experienced in their own lives.

Facilitating Traditional Cooking Methods

Traditional foods are considered to be those that have been handed down from one generation to the next in terms of knowledge, techniques or practices used in their preparation or in the choice and use of the raw material, which is generally local, as well as the culture that produces it. Likewise, they carry a symbolic significance that gives them meaning and these in turn to the culture that produces them, as they identify them with it. (Zeltin Rocillo-Aquino, 2021) [Ministry of Social Development and Culture of Argentina, Journal of Ethnic Foods]

The Chinese Goose is processed with the head intact because traditionally, the goose is filled with broth and hung vertically, to allow the skin to brown and crisp evenly while simultaneously allowing the meat inside to be steamed with the marinade.

The goose is rinsed and rubbed with a sweet and savoury spice mixture, then rests to allow the skin to dry, the carcass is filled with ginger and scallions, then the prepared broth is poured into the carcass. The opening of the goose is "sewn" up using a skewer to ensure the broth will not drip out, as one would to keep the stuffing in a holiday turkey. Typically, air is used to separate the skin from the meat. The seasoned, and marinated carcass is hung by the wings, with the neck and head ceremoniously wrapped around the top of the hook, weaving the head through the top of the hook to hold the goose in place and keep the carcass upright. Boiling hot water is poured over the skin of the goose, while holding the handle of the hook, the combination of separating the skin from the meat and dousing the carcass with boiling water is to prepare the skin for cooking in the specially designed ovens. The whole goose is then covered in a sweet and savoury marinade and hung to dry in preparation for the oven, for which it must be hung vertically to ensure proper cooking. Rather than outdoor charcoal grills, the geese are roasted in special ovens that cook with dry, hot heat. The meat is hung inside the oven, then the lid is closed, to allow equal air flow around all surfaces of the carcass, similar to convection style ovens for cooking. **[See Appendix 2- Ovens used for roasting].**

Having the head and neck intact allows the goose to be hung, so it may be cooked evenly on all surfaces, while facilitating the meat to be steamed by the broth inside the carcass, and the thin layer of





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fat is rendered during cooking. If the skin was perforated or the neck and head was removed, the aromatic broth inside the carcass would drip out or evaporate in the high temp ovens. The finished product has crisp, brown skin, retained juices in the meat and a flavourful broth to serve on the side for dipping.

American Market Viability

As stated previously in this petition, the Canadian market has demonstrated demand for the Chinese Young Goose with Head for restaurants, hospitality, and food service customers. With the increased use and sale, American customers have continuously contacted Northern Goose inquiring about the availability and eligibility of our product. American customers have communicated that they are currently purchasing domestic geese such as the Hungarian, Emden, or Pilgrim breeds, but these geese don't meet the product preferences for BBQ-roast goose. Our [Emden] Young Goose is processed between 14-17 weeks depending on when the flock reaches maturity. On average these geese have a dressed weight ranging from 2.7- over 4.5kgs (6- 10+lbs). The Emden goose, its muscle distribution and fat composition, varies greatly from the Chinese Young Goose, which is comparatively processed at 8-8.5 weeks old. Due to the older age, the domestic geese currently in commerce have more fat cover than the Chinese Goose, as well as tougher muscle due to maturity, similar to meat variances detected between veal and other cuts of beef.

The Chinese Goose has tender meat, usually 2.75 kgs- 3.25 kgs (5-7 lbs) dressed weight with only a small percentage (<5%) packaged over 3.25 kgs. The delicate skin and thin layer of subcutaneous fat on these geese make it more desirable for the BBQ market. The delicate skin does not require puncturing to render properly, the cooking process allows the fat and muscle to cook perfectly, leaving the skin crisp for optimal cooking. The commercialization of the Chinese Goose in Canada, along with the genetic variation over generations has resulted in the delayed development of the basal knob on the geese appearing between 13-16 weeks of age. The basal knob was historically a visual characteristic used to distinguish the species of goose the consumer was buying.

The USDA Poultry Slaughter Summary / (Service, 2021) *February 2022* displays that in 2021 there were 2 275 000lbs of chilled and frozen product certified in the United States, although the numerical value is based on the category of *Other- which includes geese, guineas, and squab*. While goose is not commonly consumed daily for typical American diets, the incorporation of culturally diverse foods into the traditional North American diet has encouraged an increase in various alternative commodities.

The United States is home to some federally inspected goose facilities, some of whom also specialize in ducks, squab, quail, or other alternative poultry, but there is no found facility specializing in Chinese Geese. The allowance of the Chinese Young Goose with Head for import to the US would not diminish or negatively impact the current American goose market. The Chinese Young Goose with Head could highlight the speciality restaurants, hospitality distributors and establishments looking





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specifically for an authentic BBQ goose. Opening and developing this market further is not predicted to impede on existing sales or distribution for the traditional domestic holiday goose nor is it expected to negatively impact existing American goose producers, processors, or packers. The target market for this product are consumers seeking variety from the domestic, large holiday goose, an alternative to commodity meats, consumers seeking authentic Asian flavours or a traditional ethnic meal.

By allowing restaurants and specialty markets to showcase the Chinese Young Goose as a BBQ centerpiece, it demonstrates these culturally diverse flavors and creates an experience for restaurants to attract its guests. Its street-food serving style is drastically different from the domestic goose product intention but equally as symbolic. The North American goose market in its entirety, could benefit from allowing our product for import into the USA by attracting more attention to this sustainable product and the reintroduction of varying flavours into the food industry. A driving factor for market engagement is growth in the production of goose, as a result of the growth in demand from target consumers. Foods that were once viewed by the Western world as obscure or unconventional are becoming more and more common in ethnic populations, and with the rise in diverse and ethnically integrated communities, the demand is more prevalent across all populations.

Conclusion

Northern Goose Processors requests the careful consideration of FSIS, the Office of International Coordination, Office of International Equivalency and the Office of Policy and Program Development in evaluating our request to modify the definition of dressed ready to cook poultry. We value the systematic implementation of food safety and quality objectives within North America to maintain the objective of providing resources to the public to inform them of their food choices, which is why this policy modification is necessary for us as well as American processors with similar product intentions. We would like to distribute our product in the food industry as truthfully and transparently as possible while meeting the demand we are encountering. *[See Appendix 3 Letters of Support]*

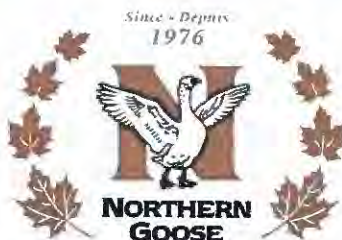
Bryan Pryde

Company President and CEO

Elissa Nordin

Quality Assurance Manager





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To the FSIS Docket Clerk:

US Department of Agriculture
Food Safety and Inspection Service
Room 2534, South Building
1400 Independence Ave. SW
Washington, DC, USA
20250

***RE: Petition for Policy Change submitted to amend the definition of Ready- to- Cook
Poultry***

To the best of our knowledge, this petition does not contain confidential information that should not be put on public display. Names of individuals or faculties which have the potential to be confidential have been blacked out to maintain confidentiality and objectivity within the petition.


Elissa C. Nordin

elissa@northerngoose.ca

Northern Goose Processors Ltd.



APPENDIX 1

**USDA LIST OF ELIGIBLE CANADIAN ESTABLISHMENTS CERTIFIED TO
EXPORT MEAT AND POULTRY PRODUCTS TO THE UNITED STATES**

**TEMPORARY USDA APPROVAL FOR
YOUNG GOOSE HEADS- BULK PACKED**

**SKETCH APPROVAL FOR
CHINESE YOUNG GOOSE WITH NECK ATTACHED**

**PROCESS FLOW DEMONSTRATING
LOCATION OF POST-MORTEM INSPECTION
AND HEAD REMOVAL**



United States Department of Agriculture

**Canada - Eligible Plants Certified to Export Meat and Poultry Products to the United States
March 30, 2022**

Updated items marked with an asterisk (*)

| EstForgnNBR | Establishment Name | Date Listed | Date Delisted | Date Relisted |
|--------------------|--|--------------------|----------------------|----------------------|
| 45 | Les Aliments Vestar, Inc./Vestar Foods, Inc. | 09/27/2004 | | |
| 47 | Maple Leaf Foods, Inc./Les Aliments Maple Leaf, Inc. | 02/07/2002 | | |
| 48 | Les Aliments Levitts, Inc./Levitts Foods, Inc. | 02/07/2002 | | |
| 49 | Premium Brands Operating GP, Inc. | 02/07/2002 | | |
| 50 | 12247054 Canada, Inc. | 12/16/2015 | | |
| 51 | Cargill Limited/Cargill Limitee | 03/05/2012 | | |
| 58 | Winkler Meats Ltd. | 02/24/2017 | | |
| 59 | Les Aliments Kamloop | 09/22/2021 | | |
| 60 | Lilydale, Inc. | 02/07/2002 | | |
| 62 | Griffith Foods Limited/Aliments Griffith Limitee | 02/07/2002 | | |
| 63 | 6583106 Manitoba Limited <i>(Also DBA Northern Goose Processors)</i> | 08/01/2019 | | |
| 64 | Les Aliments Excel S.E.C. | 07/11/2013 | | |
| 65 | Sunrise Poultry Processors Ltd. | 10/01/2007 | | |
| 66 | Sunnymel Limited Partnership/Sunnymel Societe En Commandite | 01/25/2013 | | |
| 67 | Produits Alimentaires Viau, Inc. | 03/05/2006 | | |
| 68 | Deli-Porc, Inc. | 11/26/2008 | | |
| 69B | Maple Leaf Foods, Inc./Les Aliments Maple Leaf, Inc. | 02/07/2002 | | |
| 70 | Aliments Sunchef, Inc./Sunchef Foods, Inc. | 01/08/2007 | | |
| 71 | Sure Fresh Foods, Inc. | 03/04/2016 | | |
| 74 | Les Aliments Riendeau, Inc. | 01/20/2003 | | |
| 76 | Viande Richelieu Inc./Richelieu Meat, Inc. | 08/02/2007 | | |
| 79 | Maitre Saladier S.E.C. | 11/14/2005 | | |
| 80 | Atrahan Transformation, Inc. | 02/12/2008 | | |
| 84 | Aliments Pasta Romana, Inc./Pasta Romana Foods, Inc. | 07/18/2006 | | |
| 85 | Hayters Turkey Products, Inc. | 02/07/2002 | | |
| 86 | Arctic Blast MTL, Inc. | 05/14/2004 | | |
| 88 | Exceldor Cooperative | 02/07/2002 | | |
| 89 | Volaille Giannone Inc./Giannone Poultry, Inc. | 02/07/2002 | | |
| 92 | Lilydale, Inc. | 02/07/2002 | | |
| 92C | Lilydale, Inc. | 02/07/2002 | | |
| 92D | Lilydale, Inc. | 02/07/2002 | | |

COPY

Page 1 of 4

| | | | | | | | | |
|--|--|---|------------------------------------|--|-----|------|---|--------------------------------|
| <p>U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE</p> <p>APPLICATION FOR APPROVAL OF LABELS, MARKING OR DEVICE</p> <p>FSIS has determined that information provided in items 11, 15, and 18 is exempt from mandatory disclosure under Freedom of Information Act, 5 U.S.C. 552(b)(4).</p> <p>APPLICANT: See Page 5 for instructions.</p> | <p>1. AGENT NAME, ADDRESS, TELEPHONE NO. (If using an Agent, complete this block, otherwise leave blank.)</p> <p>██████████ Inc ██████████ Arlington, Virginia ██████████ UNITED STATES</p> | <p>2. FOR USDA USE ONLY</p> <div style="border: 2px solid red; padding: 5px; text-align: center;"> <p>No.</p> <p>TEMPORARY APPROVAL</p> <p>Jul 24 2019</p> <p>U.S. DEPT. OF AGRICULTURE</p> <p>FSIS</p> <p>USE PERMITTED UNTIL</p> </div> | <p>3. FOR USDA USE ONLY</p> | <p>4. ESTABLISHMENT NO. / FOREIGN COUNTRY (If applicable)</p> <p>LSAS_TEMP1044, LSAS_TEMP1045, LSAS_TEMP1046</p> <hr/> <p>4a. TYPE OF PRODUCT</p> <table style="width:100%;"> <tr> <td style="text-align: center;">Egg</td> <td style="text-align: center;">Meat</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/> Poultry</td> <td style="text-align: center;"><input type="checkbox"/> Other</td> </tr> </table> | Egg | Meat | <input checked="" type="checkbox"/> Poultry | <input type="checkbox"/> Other |
| Egg | Meat | | | | | | | |
| <input checked="" type="checkbox"/> Poultry | <input type="checkbox"/> Other | | | | | | | |

5a. NAME OF PRODUCT
Young Goose Parts

Feb 1 2020

| | | |
|---|---|---|
| <p>5b. HACCP PROCESS CATEGORY (Select one)</p> <p>03J Slaughter - all species</p> <p>03B Raw Product - ground</p> <p><input checked="" type="checkbox"/> 03C Raw Product - not ground</p> <p>03D Thermally Processed - Commercially sterile</p> <p>03E Not heat treated - shelf stable</p> <p>03F Heat treated - shelf stable</p> <p>03G Fully cooked - not shelf stable</p> <p>03H Heat treated but not fully cooked - not shelf stable</p> <p>03I Product with secondary inhibitors - not shelf stable</p> | <p>6a. TYPE OF APPROVAL REQUESTED</p> <p>SKETCH <input type="checkbox"/> TEMPORARY <input checked="" type="checkbox"/></p> <p>EXTENSION OF TEMPORARY</p> <hr/> <p>6b. WAS THE LABEL PREVIOUSLY APPROVED?</p> <p>YES → Date of approval: _____</p> <p><input checked="" type="checkbox"/> NO Prior approval number: _____</p> <p>Number of labels on hand: <u>1400</u></p> <p>Number of days requested: <u>180</u></p> | <p>7a. AREA OF PRINCIPAL DISPLAY PANEL (Square Inches)</p> <p>40.0000 ██████████</p> <hr/> <p>7b. TOTAL AVAILABLE LABELING SPACE FOR ENTIRE PACKAGE (Square inches)</p> <p>100.0000</p> |
|---|---|---|

| | |
|---|--|
| <p>8. Does this label include a "USDA-AMS Child Nutrition Program CN Logo?"</p> <p>YES <input type="checkbox"/> NO <input checked="" type="checkbox"/></p> | <p>9. (FOR USDA-AMS USE ONLY) CN Identification Number Assigned</p> |
|---|--|

| |
|--|
| <p>10. Are there any special claims, guarantees, or foreign language on the label?</p> <p>YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> (If yes, check all that apply)</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>Allergen Statements</p> <p>Animal Production/Breed/Raising</p> <p>Certified/Verified</p> <p>Environmental/Green</p> <p>Export Only Labels w/deviations from Domestic Requirements</p> <p>Foreign Language</p> <p>Geographic/Undefined Style</p> </div> <div style="width: 45%;"> <p>Grading Terms</p> <p>Guarantees</p> <p>Natural/Organic</p> <p>Nutrition/Health</p> <p>Religious Exemption</p> </div> </div> <p>Other Claims: Specify _____</p> |
|--|

| | | |
|--|---|--|
| <p>11. NAME AND ADDRESS OF FIRM (Below and between dots)</p> <p>• Northern Goose Processors Limited •</p> <p>103 First Street SW</p> <p>P.O. Box 103</p> <p>Teulon, ROC 3B0</p> <p>• CANADA •</p> | <p>12. SIGNATURE OF APPLICANT OR AGENT</p> <p>██████████</p> | <p>13. DATE</p> <p>07/23/2019</p> |
| <p>14. (FOR USDA USE ONLY) CONDITIONS APPLYING TO USE OF LABELS OR DEVICE</p> | | |

15. PRODUCT FORMULA

| ✓ | PCT (No Fractions) | WEIGHT |
|---|-----------------------|--------|
|---|-----------------------|--------|

Goose

100

See Continuation Sheet

TOTAL (Percent must total 100%)

100

16. PROCESSING PROCEDURES *(Approval of the sketch does not convey approval of the processing procedures)*

Slaughter
Portion
Package
Label
Ship

Cuts:

1. Feet
2. Livers
3. Hearts
4. Gizzards
5. Wing Tips
6. Thighs and Legs
7. Breasts
8. Chitterlings (Intestines)
9. Heads
10. Necks

See Continuation Sheet

| | | | | | | | | |
|--|---|---|-----------------------------|---|-----|------|---|-------|
| <p>U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE</p> <p>APPLICATION FOR APPROVAL OF LABELS, MARKING OR DEVICE</p> <p>FSIS has determined that information provided in items 11, 15, and 16 is exempt from mandatory disclosure under Freedom of Information Act 5 U.S.C. 552(b)(4).</p> <p>APPLICANT: See Page 5 for instructions.</p> | <p>1. AGENT NAME, ADDRESS, TELEPHONE NO. (If using an Agent, complete this block; otherwise leave blank.)</p> | <p>2. FOR USDA USE ONLY</p> <div style="border: 2px solid black; padding: 5px; text-align: center;"> <p>SKETCH APPROVED SUBJECT TO COMPLIANCE WITH FMIA & PPIA & REGULATIONS</p> <p>Feb 14, 2022</p> <p>FSIS U.S. DEPT. OF AGRICULTURE</p> </div> | <p>3. FOR USDA USE ONLY</p> | <p>4. ESTABLISHMENT NO. / FOREIGN COUNTRY (If applicable) 063 CANADA</p> <hr/> <p>4a. TYPE OF PRODUCT</p> <table style="width:100%;"> <tr> <td style="text-align: center;">Egg</td> <td style="text-align: center;">Meal</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/> Poultry</td> <td style="text-align: center;">Other</td> </tr> </table> | Egg | Meal | <input checked="" type="checkbox"/> Poultry | Other |
| Egg | Meal | | | | | | | |
| <input checked="" type="checkbox"/> Poultry | Other | | | | | | | |

APPROVED AS MODIFIED

| | | | |
|--|--|---|---|
| <p>5a. NAME OF PRODUCT Chinese Young Goose Parts</p> | | <p>6a. TYPE OF APPROVAL REQUESTED</p> <p><input checked="" type="checkbox"/> SKETCH TEMPORARY</p> <p>EXTENSION OF TEMPORARY</p> | <p>7a. AREA OF PRINCIPAL DISPLAY PANEL (Square Inches) 247.50</p> |
| <p>5b. HACCP PROCESS CATEGORY (Select one)</p> <p><input type="checkbox"/> 03J Slaughter - all species</p> <p><input type="checkbox"/> 03B Raw Product - ground</p> <p><input checked="" type="checkbox"/> 03C Raw Product - not ground</p> <p><input type="checkbox"/> 03D Thermally Processed - Commercially sterile</p> <p><input type="checkbox"/> 03E Not heat treated - shelf stable</p> <p><input type="checkbox"/> 03F Heat treated - shelf stable</p> <p><input type="checkbox"/> 03G Fully cooked - not shelf stable</p> <p><input type="checkbox"/> 03H Heat treated but not fully cooked - not shelf stable</p> <p><input type="checkbox"/> 03I Product with secondary inhibitors - not shelf stable</p> | | <p>6b. WAS THE LABEL PREVIOUSLY APPROVED?</p> <p><input type="checkbox"/> YES → Date of approval _____</p> <p><input checked="" type="checkbox"/> NO Prior approval number _____</p> <p> Number of labels on hand _____</p> <p> Number of days requested _____</p> | <p>7b. TOTAL AVAILABLE LABELING SPACE FOR ENTIRE PACKAGE (Square inches) 869.50</p> |

| | |
|--|---|
| <p>8. Does this label include a "USDA-AMS Child Nutrition Program CN Logo?"</p> <p style="text-align: center;">YES <input checked="" type="checkbox"/> NO</p> | <p>9. (FOR USDA-AMS USE ONLY) CN Identification Number Assigned</p> |
|--|---|

| | |
|--|--|
| <p>10. Are there any special claims, guarantees, or foreign language on the label?</p> <p><input checked="" type="checkbox"/> YES NO (If yes, check all that apply)</p> <p> Allergen Statements</p> <p><input checked="" type="checkbox"/> Animal Production/Breed/Raising</p> <p> Certified/Verified</p> <p> Environmental/Green</p> <p> Export Only Labels w/deviations from Domestic Requirements</p> <p><input checked="" type="checkbox"/> Foreign Language</p> <p> Geographic/Undefined Style</p> | <p>Grading Terms</p> <p>Guarantees</p> <p>Natural/Organic</p> <p>Nutrition/Health</p> <p>Religious Exemption</p> <p>Other Claims: Specify</p> <div style="background-color: black; width: 100px; height: 20px; margin-top: 10px;"></div> |
|--|--|

| | | |
|---|--|-----------------------------------|
| <p>11. NAME AND ADDRESS OF FIRM (Below and between dots)</p> <p>• Northern Goose Processors Ltd. •</p> <p>103 First Street SW</p> <p>PO Box 103</p> <p>Teulon Manitoba, R0C 3B0</p> <p>• CANADA •</p> | <p>12. SIGNATURE OF APPLICANT OR AGENT</p> <p>Elisa Nordin</p> | <p>13. DATE</p> <p>02/08/2022</p> |
| <p>14. (FOR USDA USE ONLY) CONDITIONS APPLYING TO USE OF LABELS OR DEVICE</p> | | |

| 15. PRODUCT FORMULA | <input checked="" type="checkbox"/> PCT (No Fractions) WEIGHT |
|--|---|
| <p>Chinese Goose (Anser Cygnoides domesticus)</p> <p>Other goose parts to be used with this label are:</p> <p>Chinese Young Goose with Neck attached</p> <p>Chinese Young Goose Canada A</p> <p>Breast</p> <p>Hearts</p> <p>Livers</p> <p>Legs</p> <p>Gizzards</p> <p>Feet</p> <p>Necks</p> <p>Wings</p> | <p>100</p> |
| See Continuation Sheet | TOTAL (Percent must total 100%) 100 |

16. PROCESSING PROCEDURES *(Approval of the sketch does not convey approval of the processing procedures)*

Slaughter.
Process.
Package.
Label.
Ship.

See Continuation Sheet

NORTHERN GOOSE PROCESSORS LTD.

CHINESE YOUNG GOOSE
NECK ATTACHED
JEUNE OIE CHINOIS
COUS ATTACHER

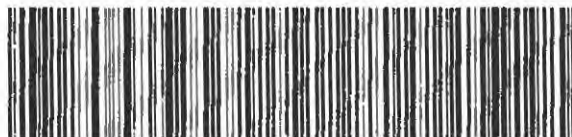


LOT CODE 0142201
CODE DE LOT



PRODUCT OF CANADA PRODUCT DU CANADA
DATE OF PRODUCTION DATE DE PRODUCTION 22/JA/14

BEST BEFORE 24/JA/07 MEILLEUR AVANT 24/JA/07



(01)10628235942147(11)220114(3102)000625(21)0142201

| | | |
|-------|--------|--------|
| 6.25 | NET kg | kg NET |
| 13.78 | NET lb | lb NET |



NORTHERN GOOSE PROCESSORS LIMITED

103 First Street SW | Teulon, Manitoba R0C 3B0
Tel: (204) 886-2552 | Fax: (204) 886-3460

Chinese Young Goose Neck Attached

Product ID: 21- CNA- 00- 0A- 000 (0001-3999)

Region/Country of Origin:

Manitoba, Canada

Species:

Anser Cygnoides (Chinese goose)

Wholesale Product Specifications

| | | | | |
|--------------------------------|--|---------------------------|--------------------|---|
| Product Characteristics | Grade A Whole Carcass Eviscerated, feet and head removed Neck Attached | | | |
| Intended Use | For Wholesale to restaurants, distributors, or other food manufacturers, for further processing | | | |
| Lot Code | 7- digit code | 3 digits Julian Date | 2 digits Year | 2 digits Batch of the day |
| Packaging | Individually Wrapped in clear vacuum bags (Cryovac), sealed with embossed clip, product label with lot code, unit weight, name, and number of Establishment. | | | |
| Shipping Containers | <i>Case</i> | 4.5- 7 lbs 2- 3.18 kg | 6 units per box | 4.5- 7 lbs 2- 3.18 kg 192 units per pallet |
| | | 7+ lbs Over 3.18 kg | 5 units per box | <i>Pallet</i> 7+ lbs Over 3.18 kg 160 units per pallet |

Frozen Product

| | |
|--|---|
| Storage/Distribution Requirements | Transport in refrigerated truck and store in tempered conditions at -18°C or colder |
| Handling Requirements | Keep Frozen |
| Basic Preparation Requirements | Thaw and cook full to an internal temperature of at least 80°C (180°F) before serving |
| Shelf Life | 24 months |



NORTHERN GOOSE PROCESSORS LIMITED

103 First Street SW | Teulon, Manitoba R0C 3B0
Tel: (204) 886-2552 | Fax: (204) 886-3460

Unit Weight Range

| Under 5.5 lbs | 5.5- 6 lbs | 6- 6.5 lbs | 6.5- 7 lbs | 7+ lbs |
|---------------|---------------|---------------|---------------|--------------|
| Under 2.49 kg | 2.49- 2.72 kg | 2.72- 2.95 kg | 2.95- 3.18 kg | Over 3.18 kg |

No additives or preservatives are used in any products manufactured at Northern Goose Processors Ltd.

Ingredients

The following priority food allergens identified by Health Canada and the Canadian Food Inspection Agency: eggs, milk, mustard, peanuts, crustaceans and molluscs, fish, sesame seeds, soy, sulphites, tree nuts, wheat and triticale

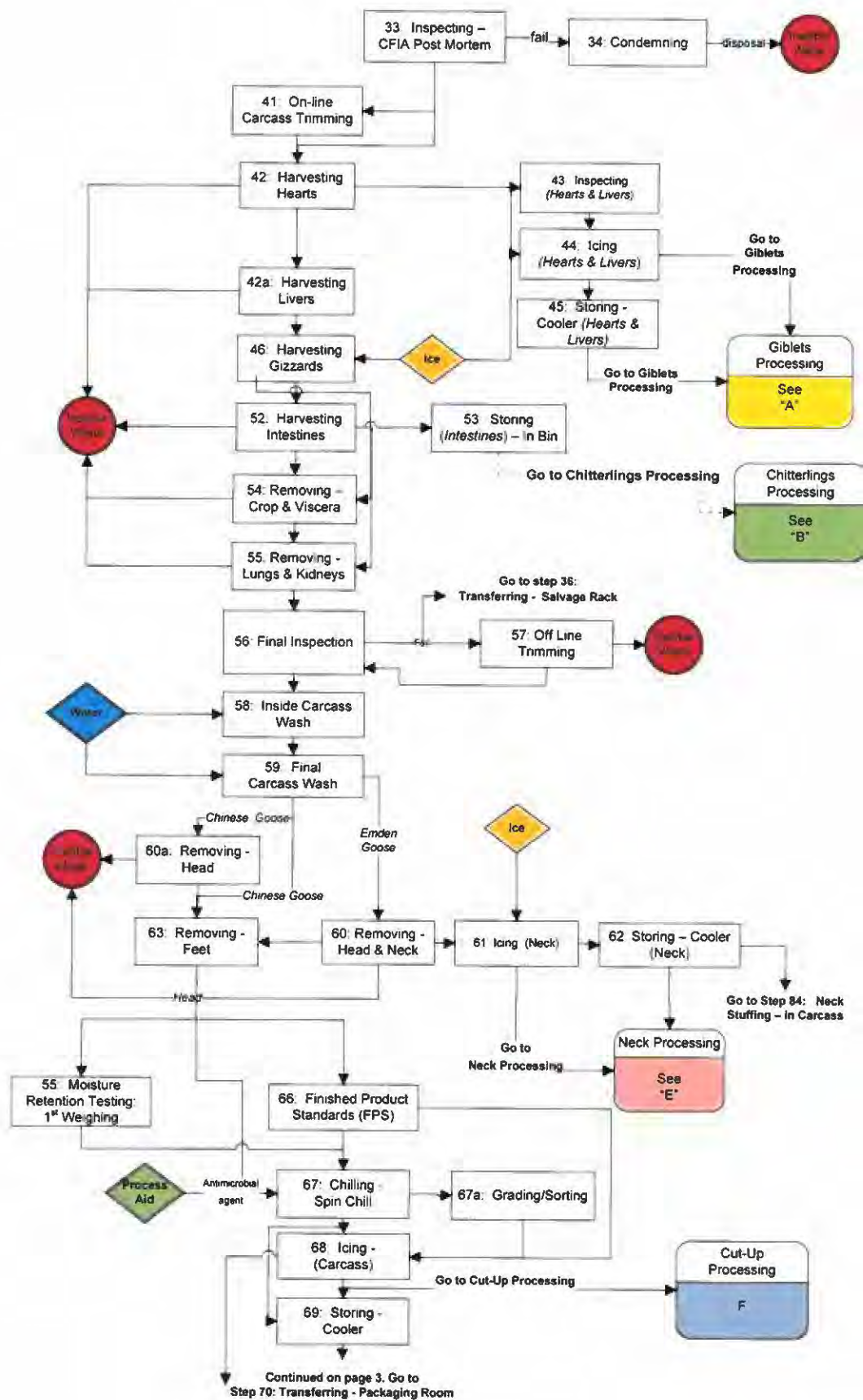
None of the allergens listed are present in any processes at Est. 063.

Microbiological Limits

Compliant with Process Verification Criteria for E. coli (Biotype I)- Ref: Annex T- USA Exports

Compliant with Performance Standards outlined in Pathogen Reduction and HACCP Systems Final Rule- Ref: Annex U; Annex U-1- USA Exports

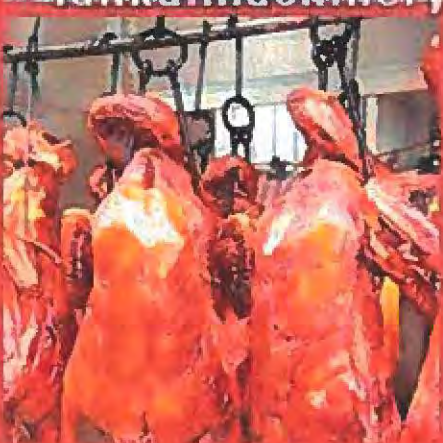
| Nutrition Facts | |
|---|------------------------------|
| Valeur nutritive | |
| Per 1 serving (125 g) pour 1 servir (125 g) | |
| Calories 370 | % Daily Value* |
| | % valeur quotidienne* |
| Fat / Lipides 31 g | 41 % |
| Saturated / saturés 8 g | 40 % |
| + Trans / trans 0 g | |
| Carbohydrate / Glucides 3 g | |
| Fibre / Fibres 0 g | 0 % |
| Sugars / Sucres 0 g | 0 % |
| Protein / Protéines 19 g | |
| Cholesterol / Cholestérol 70 mg | |
| Sodium 75 mg | 3 % |
| Potassium 250 mg | 5 % |
| Calcium 10 mg | 1 % |
| Iron / Fer 2.25 mg | 13 % |
| * 5% or less is a little, 15% or more is a lot | |
| * 5% ou moins c'est peu, 15% ou plus c'est beaucoup | |



APPENDIX 2

REFERENCE INFO:

OVENS USED FOR TRADITIONAL COOKING



lankaimachinery.en.alibaba.com



Chicken Furnace



Contact:Ms.Anne

Skype:sales_35528

Email:sales@alphamachinery.cn

Cell&Viber&What'sapp:0086 13613846077





Product Parameters

| | |
|-----------------|--|
| Type | Charcoal |
| Material | Stainless steel |
| Dimension | 31.5*31.5*53inches/800*800*1350mm |
| Package size | 33.9*33.9*26inches/860*860*660mm |
| Shipping Weight | about 121lbs/55kg |
| Capacity | 2.2lbs duck once can be roasted 15-18, 4.4lbs duck once can be roasted 8-10. (for reference only) |
| Furnace | With furnace |

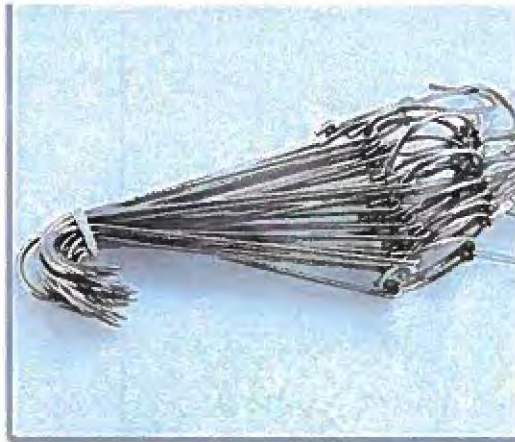
Features

- 1. Made of double layer stainless steel material, durable and easy to clean.
 - 2. Use charcoal as energy, low consumption.
- The furnace lining refractory soil, resistance to burn.
- 3. Widely used for various of poultry such as duck, chicken and other meat.
 - 4. Suitable for roast Beijing duck, beer duck, sesame roast duck, chicken legs, chicken, duck neck, etc.
- Applicable to the canteen, stores, hotels, business in areas such as the vegetable market.
- 5. With the temperature display system, making it more smart and safe during work
 - 6. Unique design.

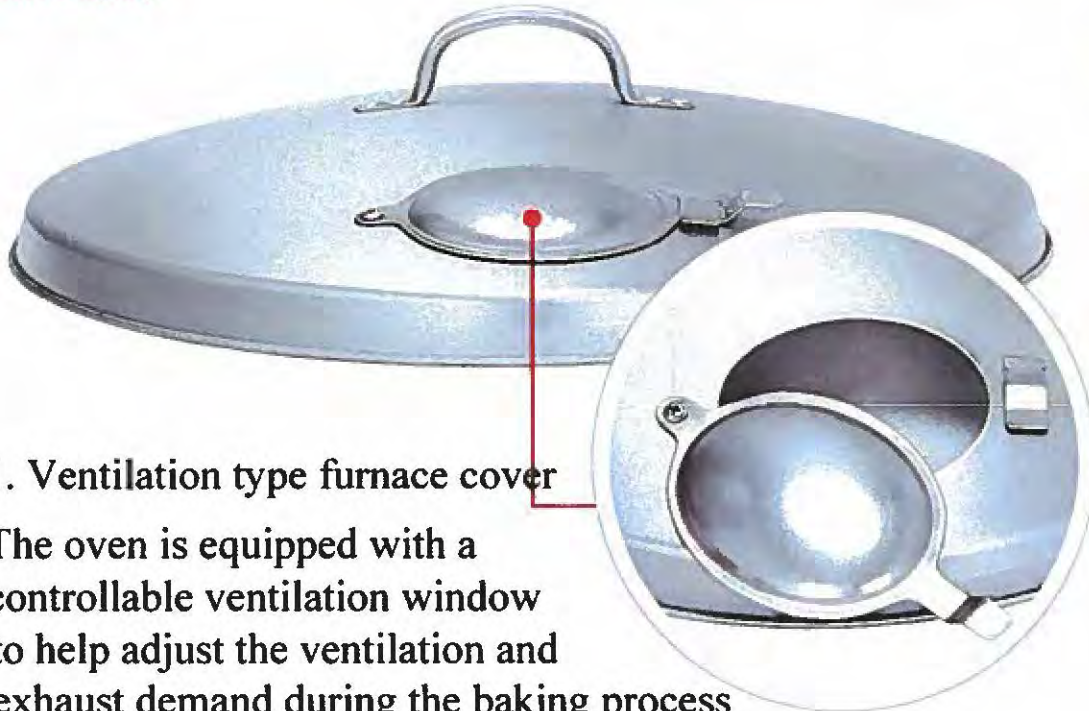
Display





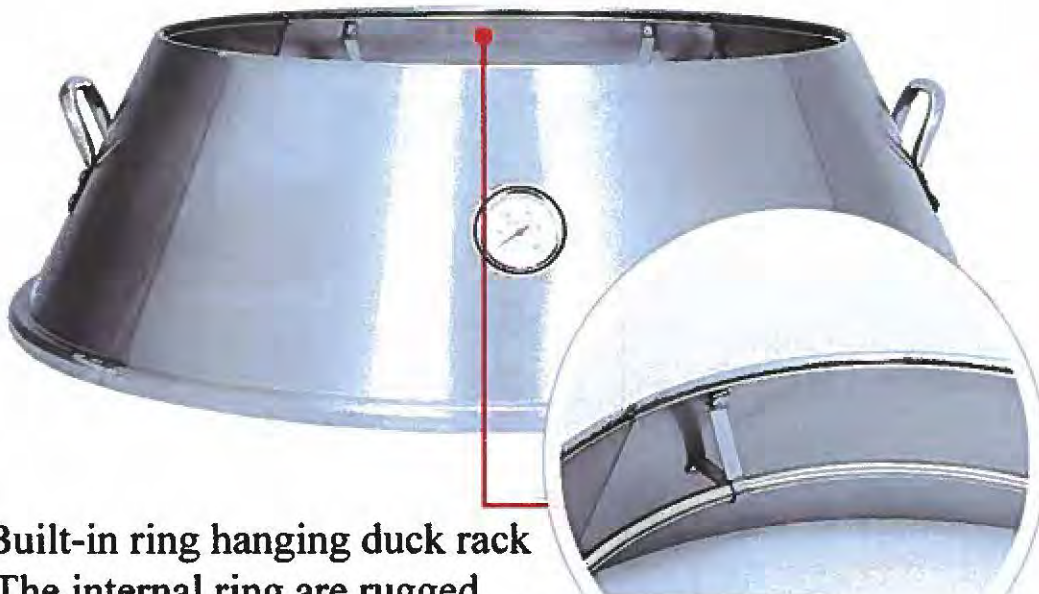


Detail Display



1. Ventilation type furnace cover

The oven is equipped with a controllable ventilation window to help adjust the ventilation and exhaust demand during the baking process



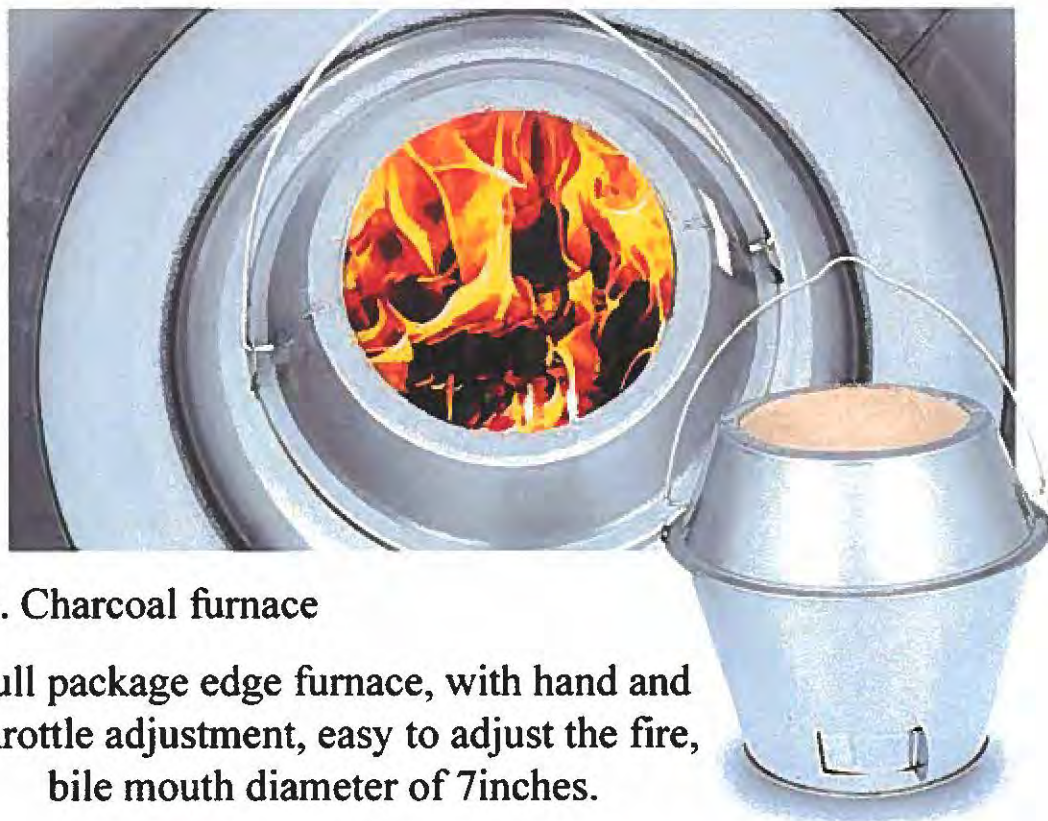
2. Built-in ring hanging duck rack

The internal ring are rugged

THE INTERNAL FIRE IS TUGGED

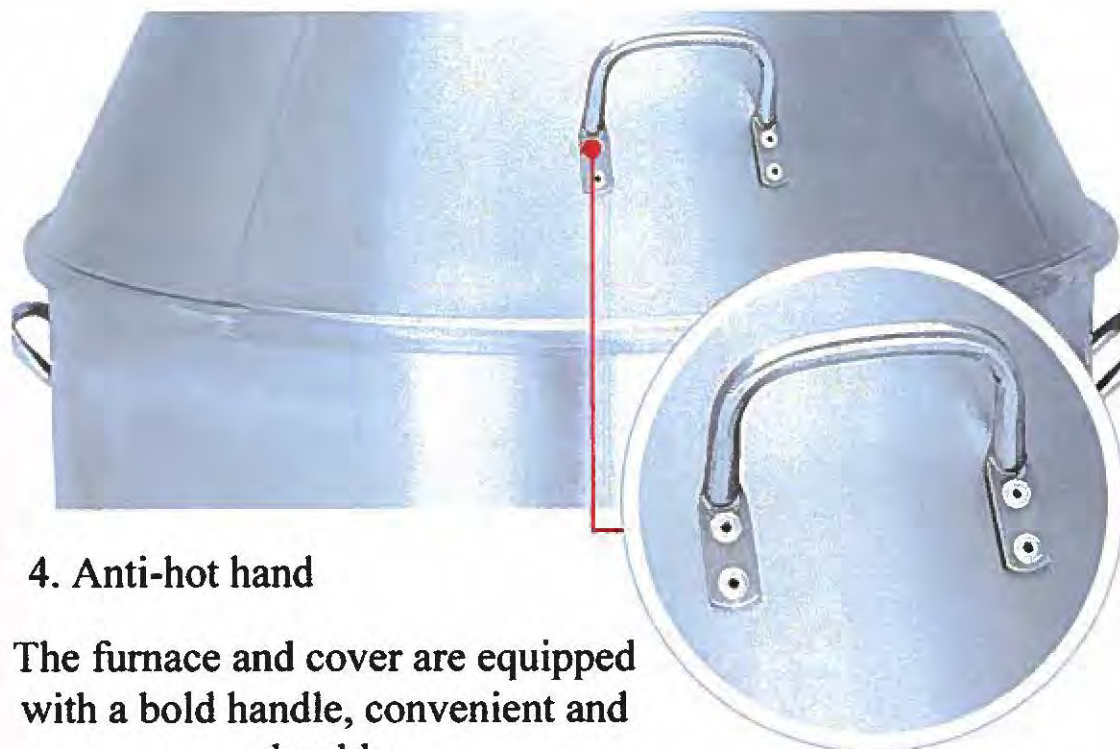
2.2lbs duck once can be roasted 15-18.

4.4lbs duck once can be roasted 8-10
(for reference only)



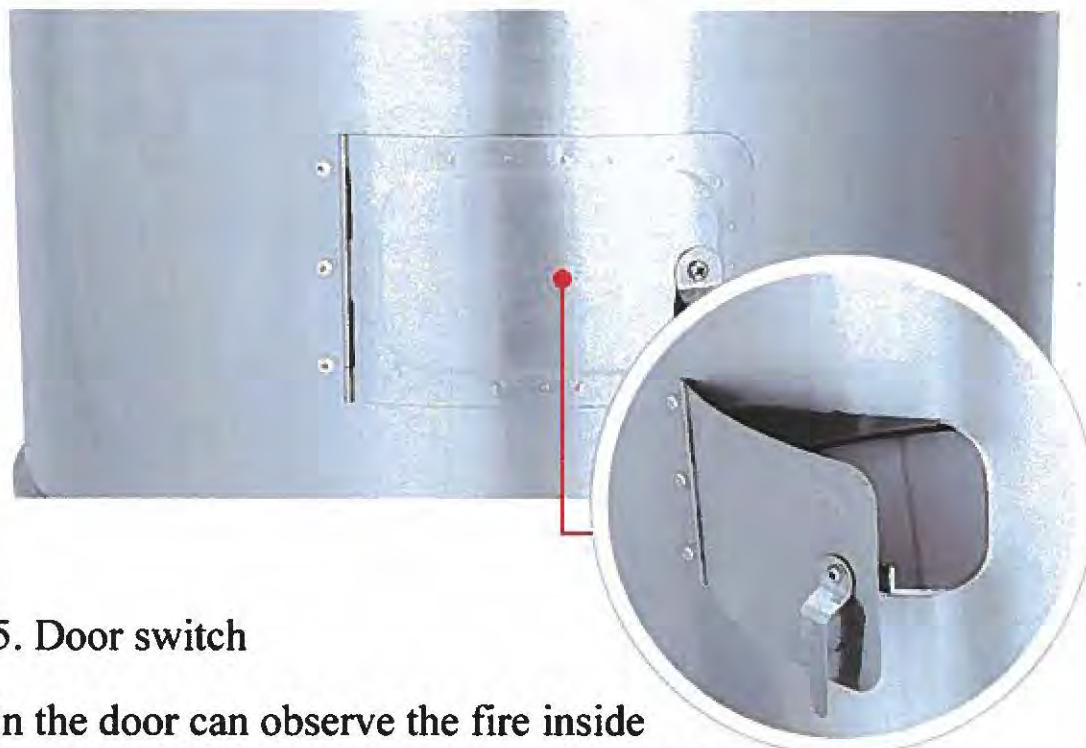
3. Charcoal furnace

Full package edge furnace, with hand and throttle adjustment, easy to adjust the fire, bile mouth diameter of 7inches.



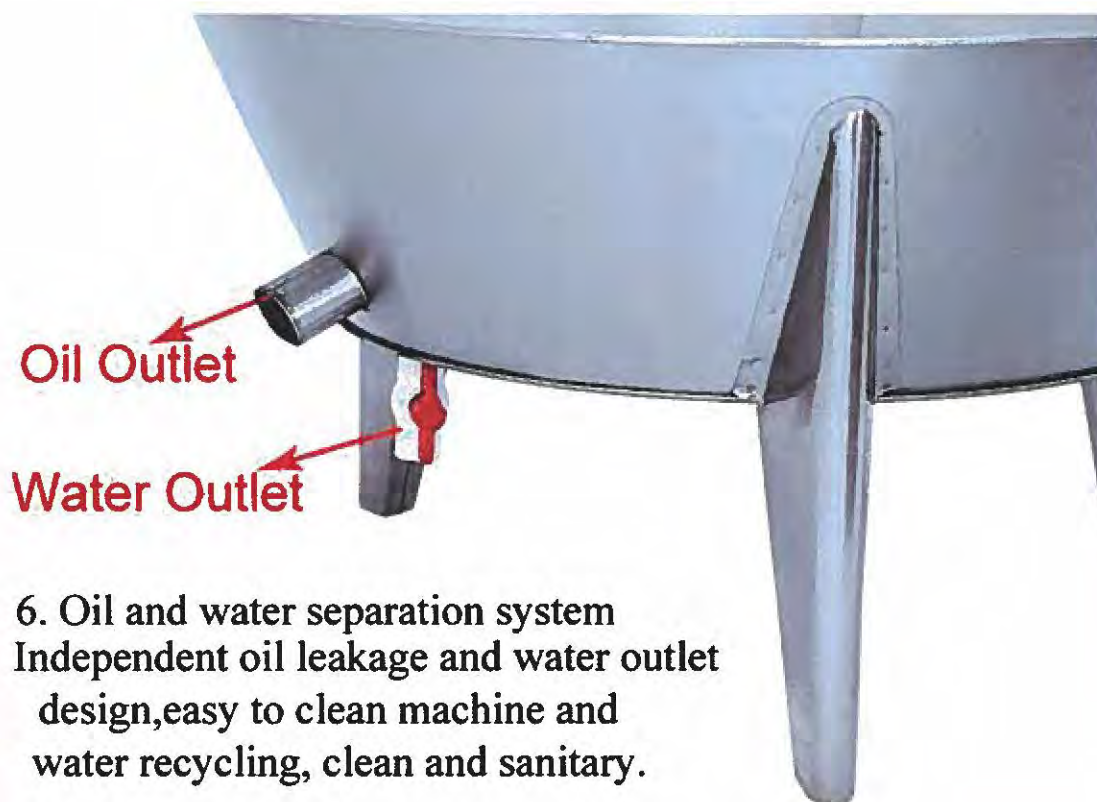
4. Anti-hot hand

The furnace and cover are equipped with a bold handle, convenient and durable



5. Door switch

In the door can observe the fire inside the furnace, so as to increase and adjust the charcoal



6. Oil and water separation system
Independent oil leakage and water outlet design, easy to clean machine and water recycling, clean and sanitary.

Package



APPENDIX 3

LETTERS OF SUPPORT REQUESTING

U.S. ACCESS TO CHINESE YOUNG GOOSE WITH HEAD

To the Office of Policy and Program Development – Labeling and Program Delivery,

Wanrong Trading Corporation (USDA Establishment No. M21342+P21342)

Located at 48-43 32nd Place, Long Island City, NY 11101

Our company has been operating since 2008 including production, processing, and wholesale of meats. Wanrong Trading Corp. has become one of the largest Chinese operating enterprises in the industry. We distribute products to Asian based supermarket and restaurant wholesalers in 15 states with our own logistics and distribution chain 6 days a week. We carry both domestic and imported proteins, including various vendors from Canada for beef, pork and duck.

Our sales team has advised that the US Asian Market is specifically requested head-on product which we would be able to distribute to our customers in wholesale form. We are currently interested in importing 5,000-6,000 whole body geese on an annual basis to start with interest in wholesale feet, wings, and intestines.

We are looking to import this product as soon as possible to meet the market demand for this specific product. There are currently no US distributors or processors offering this product to meet the demand of our customer base. Any questions or concerns related to this letter may be directed to Ken Chen at 646-546-7723.

Sincerely,

Wanrong Trading Corp. 万隆公司

48-43 32nd Place

Long Island City, NY 11101

Fax: 718.361.8879

Tel: 718-361-8882

Email: supply@nywanlong.com



Kwong Yet Lung Co., Inc.

5000 S Decatur Blvd, Las Vegas, NV 89118-1515 | T 702.889.0505 | F 702.889.0303

March 20, 2022

FSIS Docket Clerk
USDA, FSIS
Room 2534 South Building
1400 Independence Ave. SW
Washington, DC, USA 20250-3700

Letter of Support and Recommendation for Northern Goose Processors Ltd in pursuance of amending
Standard definition of *Ready to Cook Poultry*, to ultimately allow import acceptance for the *Chinese Young
Goose with Head*.

Dear FSIS Docket Clerk,

On behalf of Kwong Yet Lung Co., Inc., we have written this letter to demonstrate our support for the request made by our potential supplier, Northern Goose Processors Ltd., located in Teulon, Manitoba Canada. We are looking to purchase this product as soon as possible. There are currently no US distributors or processors offering this species or specification of product.

Our business is located in Las Vegas, Nevada. We have been an established restaurant/wholesale distributor for 41 years, serving the public and local restaurants with a variety of Asian specialty foods, including various Dim Sum items.

The Chinese Goose breed is not found from an inspected facility domestically, in the USA. The goose with head and neck intact is critical to our cooking methods and showcasing our traditional product. Our customers do not require this product to be suited to a specific religion.

Thank you for your attention to this concern and consideration to make this specialty product available to us in the USA.

Sincerely,



Peter Kwan
Kwong Yet Lung Co., Inc.



森美進口公司
SUMMIT IMPORT CORPORATION

100 SUMMIT PLACE
JERSEY CITY, NJ 0730
U. S. A.

E-MAIL: info@summitimport.com
WEB SITE: www.summitimport.com

TEL: (201) 985-9800
(800) 888-8228
FAX: (201) 985-8055

Date: March 14, 2022

FSIS Docket Clerk
USDA, FSIS
Room 2534 South Building
1400 Independence Ave. SW
Washington, DC, USA 20250 3700

Letter of Support and Recommendation for Northern Goose Processors Ltd in pursuance of amending Standard definition of *Ready to Cook Poultry*, to ultimately allow import acceptance for the Chinese Young Goose with Head.

On behalf of Summit Import Corporation, we have written this letter to demonstrate our support for the request made by our potential supplier, Northern Goose Processors Ltd. Located in Teulon, Manitoba Canada. We are looking to purchase this product as soon as possible. There are currently no US distributors or processors offering this species or specification of product.

Our business is located in 100 Summit Place, Jersey City, NJ 07305. We have been as established wholesale distribution for 60 years, serving the public a variety of Asian specialty outlets such as restaurants & supermarkets with special ethnic materials.

The Chinese Goose breed is not found from an inspected facility domestically, in the USA. The goose with head and neck intact is critical to our cooking methods and showcasing our traditional product. And also for tradition preference. Our customers do not require this product to be suited to a specific religion.

Thank you for your attention to this concern and consideration to make this specialty product available to us in the USA.

Sincerely,


Whiting Wu - President
Summit Import Corp.
100 Summit Place, Jersey City, NJ 07305
Tel: 201-985-9800

March 23, 2022

FSIS Docket Clerk
USDA, FSIS
Room 2534 South Building
1400 Independence Ave. SW
Washington, DC, USA 20250-3700

Letter of Support and Recommendation for Northern Goose
Processors Ltd in pursuance of amending Standard definition of *Ready to Cook Poultry*,
to ultimately allow import acceptance for the *Chinese Young Goose with Head*

Dear FSIS Docket Clerk,

On behalf of Boston Trident Trading Inc. we have written this letter to demonstrate our support for the request made by our potential supplier, Northern Goose Processors Ltd., located in Teulon, Manitoba, Canada. We are looking to purchase this product as soon as possible. There are currently no US distributors or processors offering this species or specification of product.

Our business is located Boston, MA. We have been an established distributor for 15 years, serving restaurants and supermarkets a variety of Asian specialty foods.

The Chinese style Goose breed is not found from an inspected facility domestically in the USA. The goose with head and neck intact is critical to Asian cooking methods and showcasing our traditional product. Our customers do not require this product to be suited to a specific religion.

Thank you for your attention to this concern and consideration to make this specialty product available to us in the USA.

Sincerely,

A handwritten signature in black ink, appearing to be 'Albert Wong', followed by a long horizontal line extending to the right.

Albert Wong
617-838-6129
albertw@bptrading.us