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I am writing to express my disagreement with Northern Goose Processors Ltd. 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 has historically, from our perspective, been on the grey side of adhering to Canadian and USA goose product protocols. This is the company that, for years, sent uncleaned goose intestines to the US labeled as “Fish Bait”, only to have it relabeled after crossing the border and end up in Chinese/Asian style restaurants of the US. This move allowed the “Fish Bait” product to directly compete with “Chitterlings” produced according to USDA protocols in this country. Northern Goose is also the same Canadian firm that dumped geese at below cost-of-production prices in 1998 and 1999, which resulted in a USDA Section 32 purchase of US domestic geese. In 2005, Northern Goose again “dumped” product into the US at below their cost of production, which caused a second USDA Section 32 purchase request. They did this by not paying the Hutterite growers in Canada, or by compensating only a portion of what had been owed them, then agreeing to pay the remaining portion on the condition that Hutterites ship new product on a credit basis. There were other violations at that time including FSIS data that confirmed mislabeling of goose products as well as fecal material contamination of their merchandise. Further evidence of food safety issues comes from news articles that reference problems of Salmonella contamination by Northern Goose in the EU marketplace which resulted in the dumping of this product into the US marketplace. All these factors added up to yet another USDA Section 32 buyout in 2006.

Based on the historical practices of Northern Goose, it seems this attempt to import Chinese goose meat to the US by way of the Northern Goose company is simply an avenue to allow Feather Industries (the parent company of 6583106 Manitoba, Ltd, the listed current owner of Northern Goose) justification to sell US customers tons of Chinese feathers from their Chinese partner, thus obfuscate the actual origins of those feathers. This appears to be another scheme that centers on a new attempt at consumer deception.

While the sales of Confucius Style geese (HOFO) have been increasing each year, I do not understand or see a necessity to change the rules of production specifically for this foreign based company. The reason US companies have not latched onto using the Chinese geese is that we are unable to make money doing so. Over the last 30 years we have tried 4 times to make it work and were unsuccessful as it just does not pencil out on the bottom line. But we followed the rules that the USDA laid out. If this amendment were to be granted, it seems logical that the domestic producers get the same 5 years to develop a Chinese Goose operation that can then compete under this new amendment. I arrive at that length of time as that is how long this Canadian firm explains it took them to establish breeders, growers, and a system for this type of production as this proposed modification to the rules would certainly change the dynamics and metrics of the profitability equation from the current rules USDA has laid out for domestic producers to follow.

Numerous questions arise if USDA were to accept Northern Geese’s policy change request. If access for geese with head and neck attached from Canada is allowed, would this then mean all poultry can be sold with head and neck optionally attached? Why just this one specific style of bird? Would US producers then be given the same latitude in marketing our products in the US? While Northern Goose goes to great lengths to describe the ovens used to cook this product in their Petition for Policy Change, please note that this is the same style oven used for religious exemption products of chicken, geese, ducks and, interestingly, suckling pigs. Will Canada be required to change their ready-to-cook-poultry definitions for US companies to compete in their country? Also, of interest to me is how exactly this new product would be treated regarding temperature rules, which currently has necks needing to be at under 40° F in 2 hours as the carcass of those small geese would likely be 4 or 6 hours.

In my belief, the Policy Change Petition fosters continuation of Northern Goose’s scam to sell their customers feathers from discounted production countries, relabeled as Canadian sourced, at a premium price. Amending the USDA definition of ready to cook poultry for a foreign company makes no sense when the domestic industry has a significant investment of resources in building years of sales based on the existing definition. This move will likely also negatively impact product credibility the US industry has been devoted to; and in fact, this policy change could very well end US goose production completely. This will not sell side by side with current goose products, it will

replace the goose products produced by a US based producer that is sitting in the middle of an economically depressed region, one that has been identified as an Opportunity Zone.

Thank you for your consideration.

Tonya Metz

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