

From: [Douglas Corwin](#)
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Subject: [External Email]Petition Number 22-01
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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).

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 o F in 2 hours as the carcass of those small geese would likely be 4 or 6 hours.

Religious exempt product is very important to the US Goose and Duck industry. Allowing this petition for Canada opens up latitude for changes in duck imports that might not only hurt the US Duck industry, but also affect consumer food safety. USDA has very strict rules for Religious exempt product. There would be no such accountability for such imported products that the petition is asking for. This move will likely also negatively impact product credibility the US industry has been devoted to.

Douglas Corwin