

White, Ralene

From: Alexandra Yurkovsky [yurkovskya@juno.com]
Sent: Thursday, June 10, 2010 3:11 AM
To: Draft Validation Guide Comments
Subject: draft rules for meat safety

Dear Sir or Madam:

I am a vegetarian who occasionally buys meat for holidays and also tries to include vegetarian dog foods and cage-free meat chews in my dog's diet. As a widely read teacher and writer, I am aware of the issues involved in factory and small farms, the latter including farms which, basically, do not torture their animals.

The likelihood from disease is far greater on factory farms, due to the numbers and unhygienic living conditions, than on small farms. The one-size-fits-all rulings that many small--and humane--farmers object to are not necessary for ensuring that meat from such well-managed farms.

It makes sense to make different rules for small, free-range farms, as long as they ensure the animals (and their meat) are healthy. Forcing rules that are unnecessary as well as exorbitantly expensive will reverse the trend toward small, humanely run farms and will increase the suffering of millions of factory farm animals. And it will increase the need for more chemicals to be added to the meat, and for diseases to remain dormant in any case.

I also append the three salient points of concern made by the Niche Meat Processor Assistance Network:

1. Scientifically questionable and unlikely to improve food safety

The mechanisms used to control food safety hazards in a HACCP system – critical control points or CCPs – must be based, by regulation, on sound scientific research. Increased in-plant testing of a CCP will not increase the validity of the CCP. Instead, FSIS should increase efforts to help plants make sure they have correctly identified and are meeting the key operational parameters of a CCP as documented by the scientific research supporting that CCP.

For example, a plant making a fully cooked product such a ham or a hot dog that is otherwise meeting the cooking time and temperature parameters of FSIS' lethality performance standards (as described in "Appendix A") should not be required to perform in-plant microbial testing to "validate" that cooking to the prescribed temperatures kills pathogens in their particular plant.

In addition, the FSIS appears to be taking two contradictory positions regarding laboratory versus in-plant conditions. On the one hand, FSIS states that new in-plant testing requirements are required "because often laboratory conditions may be different than actual conditions in the establishment" (Guidance, p. 5). At the same time, the new guidelines mandate the use of "indicator organisms" to validate in-plant pathogen reduction based upon laboratory demonstrations of the relationships between such "indicator organisms" and their associated pathogens (Guidance, pp. 7-9). We do not doubt that sound laboratory results will predict in-plant results if key operational parameters are met, but we disagree with the Agency's decision to treat some laboratory results as more transferable to in-plant conditions than others.

2. Likely to reduce farmer and consumer access to appropriate-scale processing

Recent USDA initiatives – notably "Know Your Farmer, Know Your Food" and the recent partnership with the

Department of Justice to examine consolidation in the meatpacking industry – suggests that the Department understands and supports the critical role played by small, independent meat processors as demand for local and other niche meats rises around the country. Yet as proposed, the new validation testing requirements would be extremely burdensome on small and very small plants. Such plants typically produce a wide variety of products, and the proposal would require separate testing for the production of all products that are “substantially different” (Guidance, page 9). Many small establishments around the country have stated that they will either stop processing under inspection or close entirely if this proposal were to be adopted due to the cost estimates for compliance.

3. Lacking clear justification

In your March 19th letter, you write, “there has been a demonstrated failure to adequately address validation for certain RTE products. FSIS has had more than one finding of Salmonella in its routine verification testing of... These findings resulted in recalls.” These incidents – and the desire to make such incidents never happen again – appear to have motivated the new proposal.

We request that you release the incident data used as the basis of the proposed guidance so that stakeholders can properly evaluate the information. What if the data actually indicate that these are “key parameter” problems? If so, that won’t be fixed by testing outcomes. If not, this likely indicates either an inadequate hazard analysis or inconsistent circumstances that defy sampling and predictability, such as operator error, and neither of these will be solved by in-plant validation as proposed. We reiterate that FSIS should instead increase efforts to help plants make sure they have correctly identified and are meeting the key operational parameters of a Critical Control Point supported by scientific research.

I share these concerns and urge you to revise your proposal to ensure that small farms employing humane animal husbandry methods can continue to improve the life of both animals and meat eaters in this country.

Respectfully yours,

Alexandra Yurkovsky
1207-B University Avenue
Berkeley, CA 94702
(510) 849-2613
yurkovskya@juno.com

White, Ralene

From: Sara Ibis [saraibis@gmail.com]
Sent: Wednesday, June 09, 2010 2:16 PM
To: Draft Validation Guide Comments
Subject: HACCP Guidelines

Dear Mr. Al Almanza:

I am writing in concern over the proposed changes to the HACCP guidelines. While I appreciate the concern for safety in wake of recent events, these changes are redundant and expensive. The proposed changes threaten small-scale processors and, as a result, the smaller farms that rely on them. Minnesota is blessed with many local farmers and ranchers who are raising smaller numbers of animals in more humane conditions and on more nutritious diets. These farmers need small processors and changing HACCP will result in increased prices and, as a result, loss of high quality product coming in to the food chain. Please re-consider these changes and pursue a less stringent option that will not force local processors out of business.

Thank you,
Sara Ibis

White, Ralene

From: jlingren [jlingren@netins.net]
Sent: Thursday, June 10, 2010 11:31 AM
To: Draft Validation Guide Comments
Subject: Small meat processors

Your attempt to put undue burdens on small meat processors is another move to kill small business and pander to large monopolist packers. Where is the concern? WE have had no problems. They are already inspected and have a clean record. I thought USDA was promoting local food supplies. This would be denying us the use of our home-grown food. Do the right thing and leave it at local control. I feed some cattle and usually take 6 head to the local locker for family and friends. Don't spoil this.

Laverne B. Lingren Ogden, IA

White, Ralene

From: Steve Dropkin [steve@dropkin.net]
Sent: Thursday, June 10, 2010 2:12 PM
To: Draft Validation Guide Comments
Subject: Comment on USDA meat-safety guidelines

Dear Mr. Almanza:

I understand that USDA legislation now in draft will have a chilling (no pun intended) effect on small meat producers. I am writing to urge rejection of these proposed regulations.

I know the USDA has a mandate to protect the American public from tainted and improperly-handled meats and animal-related products. I know that, over the years, the USDA has recommended and mandated many HACCPs which have helped ensure food safety.

But I'm concerned that a well-intentioned effort to double-verify some HACCPs is a movement which significantly impairs smaller producers.

If the USDA requires -- and independent research confirms -- that an acid wash over a specific time interval is sufficient to disinfect meat (and it does), then documentation that the wash has been done properly should be enough to verify clean meat. Requiring small producers to further verify this verification is a step which will drive up the costs incurred by smaller producers, putting them at a further disadvantage to the IBPs and Cargills of the world.

I cannot believe that is the intent of this legislation. I say this as a consumer who refuses to eat commercial ground beef because of the poor track record of the slaughterhouses and the fact that the large companies find it acceptable to combine flesh and trimmings from several continents to create "beef products" (viz the recent lawsuit against Cargill). Their failure to process properly results in tons of product being recalled (!).

I say this as a consumer who feels entirely comfortable with the products I buy from producers like Fischer Family Farms and Prairie Pride Farms and Odenthal Meats -- producers with well-publicized management practices and documented safety in their businesses.

Small producers already find it challenging to compete with the lower-than-low prices offered by the local megamart. Certainly producers of any size who fail to meet USDA standards should be punished and the conditions corrected. But please do not hobble small producers (with demonstrated safety records) with "belts and suspenders" regulations when so much of the rest of their business is conducted with integrity and safety.

Respectfully,

Steve Dropkin
489 Michigan Street
Saint Paul, MN 55102

White, Ralene

From: Vicki Mann [vicki@storymann.com]
Sent: Thursday, June 10, 2010 4:10 PM
To: Draft Validation Guide Comments
Subject: proposed legislation

For many years, I have purchased pork, beef and chicken from a farming family that lives about 100 miles west of my home. I have seen the way they raise their animals: free range, grass-fed, hay in the winter when snow covers the ground. They are humanely raised and slaughtered. The quality of the meat from these animals has a positive impact on the health and well-being of those who eat it. It's very important to me to be able to choose to buy from a local, sustainable farm. They have their meat processed at a small processor, Belgrade Meat Center, whose existence is threatened because of proposed legislation that would make it prohibitively expensive to do business because of the testing they would have to do.

Every news story I have heard that is about contaminated meats has involved the large meat processors. I don't recall hearing any news stories about problems with dangers of small processors. Federal inspectors should be able to stop slaughter at those large plants if they see something that raises a red flag about food safety.

Belgrade Meat Center markets their meats only in Minnesota. Their safety record is easy to track and speaks for itself.

In this time of buying locally because it's better for the earth and better for the consumers, the proposed legislation makes no sense. It would only hurt those who are making it better for me, my family, and our region.

Vicki Mann
3208 46th Ave S
Minneapolis MN 55406

White, Ralene

From: nanettehall@hotmail.com
Sent: Thursday, June 10, 2010 5:42 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - Draft Validation Guide for HACCP

Hello,

I feel that the guidelines in place for small IOWA meat processors are quite adequate! If you continue with proposed rule change you will have a **NEGATIVE** impact on my familys choice of where we obtain out meat. We buy a significant part of our meat that has been processed by small meat processors because of the apparent inability of the Large processors to provide us with a consistent healthy product. I do not hear of problems with a small packing firm primarily because they service neighbors and people who will complain if the product is "bad". However, you hear time and time again of a "recall" from various large processors and inevitably it is to late to due anything about the suspected products because of the timing.

Again, I would like to reiterate that you **NOT** change this rule as it would not provide that much in alleged safety. It would only add more red tape. This would also limit my choices for meat and it would likely add to the cost of my food budget which in these times are of **GREAT** concern to me.

Thank you kindly,
Nanette Hall

White, Ralene

From: Russ Young [Russ@jitpowdercoating.com]
Sent: Thursday, June 10, 2010 6:53 PM
To: Draft Validation Guide Comments
Cc: Arlene Young
Subject: Need an explanation here...

Dear Clerk,

I'd like to introduce myself before asking a few pointed questions (just so you know a little about the person asking these questions).

I am an American citizen.

I was born and raised in a farming community.

I have served in the armed forces.

I pay my taxes (both state and federal).

I am involved in my community.

I am involved in my school system.

I am involved in my church.

I vote every time there is an election.

I am all for "We the people..."

I support government regulations so long as they are proven to be necessary, well defined, and do not cause bigger problem than what they are intended to solve.

I am NOT a "tree hugger" (defined as an over-the-top, throw caution to the wind, find a cause—any cause—to protest against).

I am NOT a vigilante.

I am NOT a welfare recipient.

I am NOT involved in any type of political protesting movements.

Briefly stated, I am an average middle-class American Joe trying to support my family, friends, community, and country.

I have said all of that to say this; the USDA (part of MY GOVERNMENT) has decided to mandate where I purchase the food I am going to eat!

I buy locally, supporting the farming community which is part of my heritage. The meat that I purchase and consume has been humanely raised and slaughtered, grown naturally without steroids or loaded with anti-biotics, tastes great, and just happens to be as cost effective as the mass-produced stuff that is for sale in Cub Foods!!!!!!!!!!

I have recently learned that the Food Safety and Inspection Services (FSIS—a subdivision of the USDA) is proposing new rules which will impact small meat processors and rapidly put them **all** out of business. The initial testing and annual maintenance fees for each individual product for sale are only affordable for mass-production facilities and related companies. Passing these new rules will force me...the average American Joe...to purchase only from those big-business companies which all have had multiple recalls and contamination issues—my meat processor has had NONE! This was a major contributing factor in my decision to purchase directly from the small community producers in the first place.

Here is my pointed question:

Can you provide me a detailed study showing that the small farming community meat producers provide a reasonable threat requiring this level of ACROSS-THE-BOARD testing requirements? Show me this and I will be the first one to support it. If you cannot, I believe it is time for the legislators to work on how to manage the facilities that are the source of the **issue**, rather than pass across-the-board rules that will do nothing but force more people to purchase from the biggest violators of the rules intended to keep us Americans safe.

I eagerly await your response.

Russell, Arlene, Mikayla, and Tiffany Young

P.S. If you'd care to discuss this in person, please call me at my office phone listed below.

Russell Young
Sales Manager

JIT Powder Coating
21020 Eaton Ave
Farmington, MN 55024
651.463.4664 phone
651.463.4627 fax

White, Ralene

From: Keith Naps [keithnaps@gmail.com]
Sent: Wednesday, June 09, 2010 11:47 AM
To: Draft Validation Guide Comments
Subject: validation comments

To Whom it May Concern,

The USDA is to be commended for taking action in the wake of recent meat contamination cases here in Minnesota. Meat processing practices are far from perfect, but the recent upsurge in small, family owned and operated slaughtering facilities has increased my confidence in the meat available to the discerning customer. Unfortunately, our dependence on mass-produced, factory farmed meat will continue to propagate unsafe slaughter and handling practices, and will ensure that a majority of the meat in supermarkets and restaurants carries an elevated risk of contamination. As a consumer, I value the option to obtain meat from other sustainable sources.

I was relieved by your fact sheet to learn that microbial studies will not be mandated for those slaughter facilities practicing scientifically proven de-contamination techniques. Imposition of such a mandate would impose an unfair disadvantage to those smaller family farms and facilities that are unable and unwilling to automate their slaughterhouses. In addition, such a mandate would not protect the customer, since the efficacy of smoking and other established techniques is not in question. Imagine a surgeon donning sterile operating room apparel and then swabbing it for microbes before entering the OR.

I urge you to make sure such a mandate does not enter future policy with respect to meat decontamination. Maximum meat safety will be achieved through the success of smaller, sustainable family farm and slaughter operations. As consumers and citizens, we must see to it that they are able to survive.

Thank you,
Keith Naps

Keith Naps
4722 28th Ave S
Minneapolis, MN 55406
612-817-6060

RECEIVED
MAY 04 2010

April 29, 2010

Susan Griebel
12327 170th Street
New Ulm, Minnesota

Docket Clerk USDA
FSIS Room 2-2127
5601 Sunnyside Avenue
Beltsville MD 20705

Hi,
My name is Susan Griebel and I live near New Ulm, which is in Brown County, MN.

As a livestock producer who depends on the meat industry, I am concerned about the draft validation compliance guide because:

- a) There is no clear and supportable case for the existence of a food safety problem that this testing would resolve! The majority of food borne illness in meat products come from huge corporate meatpacking plants. "If it ain't broke, don't fix it."
- b) The guidelines run absolutely counter to the Know Your Farmer, Know Your Food Campaign that the USDA is promoting.
- c) The new meat testing regulations will be costly and time consuming for small meat processors, which could possibly put them out of business. These small and midsize processors are key partners in making local and regional food systems work. Also, especially during these economic times, the United States needs every business to be successful!
- d) I believe these new meat testing regulations for small food processors will waste money, time and precious resources (i.e. the well-being of small business owners) In other words, it will increase their psychological, emotional and physical stress.

Please do not implement these meat testing regulations for small food processors. Thank you for your time.

Sincerely,



Susan E. Griebel