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APR 28 2010

April 19, 2010

Mr. Alfred Almanza, Administrator
c/o Docket Clerk
USDA Food Safety and Inspection Service, Room 2-2127
5601 Sunnyside Avenue
Beltsville, MD 20705

Dear Mr. Almanza:

I am the co-owner of Boccalone Artisan Meats, a Very Small plant (est. 6034) in Oakland, California, producing less than 50,000 pounds of pork products per year. I am writing to comment on "DRAFT GUIDANCE: HACCP SYSTEMS VALIDATION", under consideration at the USDA Food Safety and Inspections Service.

We believe that the document under consideration places far too much focus on process-related aspects of food safety, while excluding from consideration the USDA's own policy role in engendering the arguably much greater systemic risk posed by the increasing consolidation occurring within our industry. Specifically, the policy shift being considered will place disproportionately greater financial burden on small and very small plants, which in turn will drive more and more such plants out of the market. If implemented, this shift in policy will ultimately make our nation's food system as a whole less safe, not more safe.

We understand the political and bureaucratic attractiveness of imposing supposedly higher standards of safety on food producers. However, a change in guidance such as the one under consideration will have the opposite effect that you intend. By issuing policies that greatly favor producers who enjoy substantial economies of scale in production, the outcome will be – just as the implementation of HACCP itself has caused over the past 10 years – to reduce the number of small and very small meat producers such as our business. In turn, Americans will continue to obtain a greater and greater proportion of their food supply from among a narrower selection of increasingly large producers. We are not advocating a repeal of HACCP. However, from a practical perspective, one has to acknowledge that many of the gains made from the adoption of HACCP in the past two decades have been more than offset by systemic losses in food safety as more and more of the nation's food supply is processed by large-scale industrial producers, causing individual failures in food safety to become both more likely and more severe in scope. If implemented as currently considered, the draft guidance will worsen this existing trend and more consumers will be at greater risk.

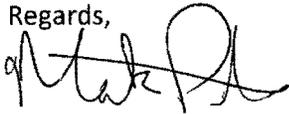
We assert that the most serious food safety issues facing our nation have more to do with the size, scale, and distribution scope of industrial food producers than they have to do with how HACCP policy is

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administered at small and very small plants. The raw numbers of consumers at risk due to food safety issues from an individual incident at an industrially-sized plant dwarfs those at risk from food produced small plants, even when considered proportionally. Put another way, our little plant would need to produce tainted food every day - completely and continuously - for more than 20 years to generate the same amount of unsafe product as found within a the most recent significant single-processor recall in our field, which consisted of product that processor created in just a few weeks. Yet the new rules under consideration treat our plant's risk the same as the large plant's risk. As future FSIS policies increasingly favor the super large plant at the expense of the very small plant, consumer suffering in each future food safety incident will be increasingly severe and dangerous to the public.

We urge you not to implement the draft guidance as contemplated; it would be a severe blow to small plants and will reduce the overall safety within our nation's food system. We ask instead that you consider from a broader perspective how to best serve the USDA and FSIS's mission of providing leadership for the nation's food supply by taking steps that increase – rather than diminish – consumer choice and to prioritize access to safe, clean, local food produced at a smaller scale.

Regards,



Mark Pastore
Boccalone

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Duane Acker
President Emeritus, Kansas State University
66344 Troublesome Creek Road, Atlantic, IA 50022
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712-243-4757

April 23, 2010

To: Under Secretary Jerold Mande, Food Safety
Administrator Alfred Almanza, FSIS
→ Docket Clerk, FSIS/USDA

This letter is to express concern regarding proposed changes in the HACCP validation process for small and midsize meat processors.

As background, I have taught meat processing at Oklahoma State University, spent days in processing plants with carcasses and product from research animals while at Iowa State, watched the transition to requiring federal equivalency for state inspection programs while at Kansas State, and aggressively supported the move toward HACCP while USDA assistant secretary for science and education.

I now live near a town of 7,000 that has two well-managed, high quality meat processors which do custom processing and retail. I patronize both, the community is proud of both, and both have both local and distant customers. Former residents, after a visit to Atlantic, often leave with a cooler full of product from one or other of the shops.

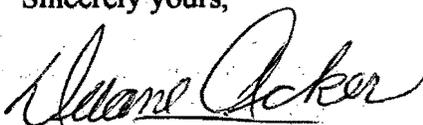
Many communities across America host quality meat processors of this type. Collectively they are part of and serve the increasingly valued citizen desire for "known source product." As important, they provide respected examples of entrepreneurship and worker jobs in Rural America.

I worry that the proposed changes will impose such a cost and time burden on such processors as to force reduction in services, product handled, and jobs, or even closure. Certainly, they would inhibit the start-up of new facilities.

I fully respect the need for sanitation/safety regulations. I remain committed to support of the HACCP concept and I also understand the statistical bases for making judgments on numbers of tests.

Always there are trade-offs. In this case I worry that entrepreneurship, "known source product," and jobs in Rural America will be unnecessarily sacrificed for a perceived, but indeterminate, increase in "food safety caution." I urge reconsideration of the proposed changes in the HACCP validation process for small and midsize meat processors.

Sincerely yours,


Duane Acker



**Hillsboro Community
Unit School District #3**

1311 Vandalia Road
Hillsboro, IL 62049

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David E. Powell, Superintendent

dpowell@hillsboroschools.net

Friday, April 23, 2010

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

Re: Comments – Draft Guidance on HACCP System Validation

Dear Mr. Almanza:

It has come to Hillsboro CUSD #3's attention through our local meat processor, Paris Frozen Foods, Inc. in Hillsboro, IL that many new federal requirements will be placed on all meat processing plants. This could force the price of meat to rise or possibly put them out of business altogether. Paris has served our community and many of the surrounding communities that make up Montgomery County for over 50 years.

Our community as well as our school district benefit not only from the tax revenue businesses such as Paris Frozen Foods, Inc. provide, but also from the local charity and services they offer. Many school and community fundraisers throughout the county are supported by Paris Frozen Foods, Inc. products. Their product quality and service are second to none. Without their products, service, and generosity, many school and community organizations will suffer.

I understand the good intention the HACCP System Validation was implemented under. However, if meat processors have no problems passing past inspections and no current food safety related issues facing them, why implement new requirements that may harm communities and close the doors of small businesses for good?

Please consider all of the above comments on the HACCP System Validation and thank you for the opportunity to express our concerns.

Sincerely,

David E. Powell, Superintendent

Cc: Senator Richard J. Durbin
Senator Roland Burris
Congressman John Shimkus
Congressman Phil Hare

Rhodes, Suzette

From: harriet fasenfest [harrietjim@mac.com]
Sent: Monday, May 24, 2010 3:52 PM
To: Draft Validation Guide Comments
Subject: Comment

To whom it may concern,

Being an advocate of small farmers and direct farm share meat purchaser and having currently written a book on the matter I know, after research, the challenges facing small processors as they currently exist. More costly regulations would be the death bell for many of them. Though I think safety inspections are vital to this movement you must understand that the these small operations simply to not have the same funding as larger facilities. In any event, I would like to formally offer my comments in hope that more, not less, independent and small processing centers are both established and supported. These new HACCP requirements for small processors don't really seem to be working towards that end.

Sincerely,
Harriet Fasenfest
4039 NE 14th
Portland, OR 97212

Dear Manager:

I am a farmer in Southern Minnesota who direct-markets pork to customers interested in buying local foods. While I applaud the USDA for implementing policies to promote the local foods economy, I am concerned about how new proposed meat testing guidelines will impact local meat processors like the one we partner with to sell pork. I hope the USDA is mindful of the potential of this legislation to prove so costly and onerous for small meat processors that it has a chilling effect on the local foods economy. Thank you.

Sincerely, Jim Musson

Rhodes, Suzette

From: ERIC FORSBERG [ewforsberg@msn.com]
Sent: Sunday, May 16, 2010 8:31 AM
To: Draft Validation Guide Comments
Subject: small meat processors

I am concerned about the proposed meat inspection rules affecting small meat processors. Testing sounds like a very good idea, yet the costs appear to be prohibitive for the small, local processors that provide the clean, safe meat on which I depend. Meat from the big, factory farms is what is making us sick, yet these farms and their huge processors may be the only producers that survive if this legislation goes through.

I got my information about this from Land Stewardship Project, an organization that I trust.

Gloria Peck
Minneapolis

The New Busy think 9 to 5 is a cute idea. Combine multiple calendars with Hotmail. [Get busy.](#)

Rhodes, Suzette

From: Emily King [4lllimey@gmail.com]
Sent: Sunday, May 23, 2010 3:02 PM
To: Draft Validation Guide Comments
Subject: in support of small slaughterhouses

I am a consumer, and I am writing to comment on the federal Food Safety and Inspection Services draft rules for meat safety.

I do not think that small slaughterhouses should have to go through the same testing regulations as huge industrial slaughterhouses. The processes are very different at the different size facilities, and small slaughterhouses should not be punished for the meat recalls resulting from the way huge industrial slaughterhouses do things. Please don't make things so onerous for the small slaughterhouses that they cannot afford the regulations and are forced out of business. Small slaughterhouses are the only way many of us who prefer to can eat local meat.

Thank you,
Emily King
Hanford, CA 93230

Rhodes, Suzette

From: Valerie Maddock [maddadh@hotmail.com]
Sent: Thursday, May 20, 2010 2:04 PM
To: Draft Validation Guide Comments
Subject: Re: Meat Production

Docket Clerk USDA

I have heard about new rules that will require meat processors to submit their products to very costly tests. I don't understand how the family farms will be able to afford this, and isn't the whole point to get people to support these family farms? To buy locally produced meat? Please consider all the reasons people are turning back to these small producers, and do not make it impossible for them to exist in the market.

Sincerely,
V Maddock
Mound, MN

maddadh@hotmail.com

Get a free e-mail account with Hotmail. [Sign-up now.](#)

White, Ralene

From: aeammons@hughes.net
Sent: Tuesday, June 08, 2010 10:05 AM
To: Draft Validation Guide Comments
Subject: Message from Internet User - Regulation of Local Meat Lockers

I strongly resist proposed additional "safety" regulations for local meat lockers. These businesses have served safely and successfully for years under current safety regulations. The imposition of more controls is evidence of a larger government trying to take more steps to "protect the people" from a problem that does not exist.

We need these businesses for processing at the local level a safe, home-grown food source. We need them for processing the huge annual deer harvest in Iowa.

Enough regulation is enough. Leave the current regulations for local meat lockers unaltered.