

White, Ralene

From: Jennelle Harper [jennelle.harper@gmail.com]
Sent: Tuesday, May 25, 2010 3:18 PM
To: Draft Validation Guide Comments
Subject: comment re proposed changes to HACCP food safety plans for small and very small plants

Hello,

I see and hear a lot in the news regarding food contamination lately. I'm sure the changes to HACCP food safety plans are in part, a response to some of these instances. However, it occurs to me that changes, that would include year-round testing in plants that have no history of contamination, are a solution, by plain definition. They are just NOT the solution to this particular problem.

Contamination generally occurs in large processing plants. Some large processing plants have historical violations and should be tested year-round. But not the small and very small plants with no record of incidents. There should not be a "one size fits all" approach in this situation. More focus should be put on fixing the problems at the large facilities. When contamination is discovered, measures should be taken to ensure it doesn't spread to other products at the facility or continue to be in products that are put out for distribution.

Why simply test for ecoli if you can do more to make sure it doesn't end up in the meat in the first place?

For the past year, I have bought meat EXCLUSIVELY from my local farmers market. I DO NOT plan to go back to buying meat at the grocery store. If my local meat producers cannot continue to supply me with meat, I will stop buying it. I rarely eat conventional meat in restaurants. Many of my friends feel the same way I do.

Thank you so much.

Jennelle Jones
www.deliciouspotager.blogspot.com

Rhodes, Suzette

From: shaneupchurch@gmail.com
Sent: Thursday, May 27, 2010 10:12 AM
To: Draft Validation Guide Comments
Subject: Message from Internet User - HACCP Changes

Hi, I just read an article outlining the new regulations on slaughter houses that are being proposed. I feel that this is a terrible idea. The cost far outweigh any benefits we, US citizens, would get from these changes. I work at a gym and purchase about 1 cow every quarter that I divide up among our members. To us, grass-fed beef is the only way to eat beef. These new changes would simply be too costly for any small scale local farmer to comply with.

I think the number 1 reason our country is the most obese in the world is that we have become so disconnected from our food. We eat and eat and eat and never stop to consider the source of our food or the work involved. Buying from local farmers, people that you can physically talk to and develop a relationship with, is the only way to reverse this problem. Dont add to an already faulty system. We do not need more regulations, we need more education!

Rhodes, Suzette

From: lynnedeg@yahoo.com
Sent: Thursday, May 27, 2010 7:44 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - HACCP proposed draft regulations.

Please do not enact these regulations without considering how they will impact the small local meat processing plants. These plants are providing a service for grass fed animals. The market for grass fed animals has just come to my attention and I greatly appreciate the ability to go to the farm and order my meat. Please do not make the farmers send their animals to a "factory" meat processor. As all of the meat recalls have come from the "factory" meat processors, I no longer wish to purchase meat from the grocery stores. The smaller local meat processors adhere to all the present standards and then some. To require them to meet these new regulations is tantamount to cutting them off at the knees. Please reconsider these regulations for the small local processors. We need their services.
Thank you,
Lynne Doctor

Rhodes, Suzette

From: dpinnisi@twcny.rr.com
Sent: Monday, April 19, 2010 6:48 PM
To: Draft Validation Guide Comments
Subject: No reinterpretation by USDA of existing regulations!

Please do not make it even more difficult for our local butchers and farms with the reinterpretation by USDA of existing regulations!

I love that I know what farm my meat came from, and I am welcome to visit that farm at any time.

It is important to me that the animals are free range.

The only reason I can see for making the regulations more difficult is to make it impossible for the small farms to sell to the public.

This goes against everything this country was founded on and still has anti-monopoly laws to prevent.

Thank you,
Donna

Rhodes, Suzette

From: m.gwin@meat-pro.com
Sent: Thursday, April 01, 2010 9:50 AM
To: Draft Validation Guide Comments
Cc: Charlie Drumheller; rdubpi@aol.com
Subject: Inspection

To whom it may concern (or, perhaps better stated, whomever is listening),
This is another example of an imperial government forcing their ideas upon the populace w/absolutely no regard for the individuals and businesses that will be effected by its actions.
The reality of this whole issue is, pathogens are endigenous to meat products. If given the tools to realistically combat these pathogens - tools like post consumer irradiation or carcass irradiation - which have been demonized by politicians throughout the years as it was expedient to do so.
All of the academicians and lawyers that populate DC must understand that pathogens cannot be legislated, tested or litigated out of meat products. Only meaningful bacteriocidal steps will help in this fight.

Sincerely,
Mark Gwin
M/S Technologies, Inc.

Rhodes, Suzette

From: Randall.Larson@fsis.usda.gov
Sent: Friday, April 02, 2010 3:32 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - Validation initiative

As an FSIS employee for a state program, I agree with the initiative that validation needs to be continuously upgraded and will continue to try to prepare plants to comply with the new expectations. One of the issues we are continually faced with is the level of food safety risk the small and very small plants pose compared to the large volume producers. Please help us to support this effort by providing data regarding the number of positive test results, number of recalls, and especially food borne illness cases traced to small plants. This will help link cost of the initiative to potential outcomes.

Rhodes, Suzette

From: Todd Douma [todd.douma@gmail.com]
Sent: Saturday, April 03, 2010 11:57 AM
To: Draft Validation Guide Comments
Subject: Hazard Analysis and Critical control points

Dear Sir/Madam,

Please reconsider the new measures you are considering to ensure food safety. My wife and I buy local meat and produce from small farmers, and we are concerned that the price they would have to pay would put them out of business.

Thanks

Todd Douma

Rhodes, Suzette

From: Lisa Carlson-Douma [lisacarlsondouma@gmail.com]
Sent: Saturday, April 03, 2010 12:40 PM
To: Draft Validation Guide Comments
Subject: HACCP Concerns

My husband and I are attempting to be Locavores and eat food produced within 100 miles of our home. We are committed to this practice because it has environmental benefits (less transportation costs), economic benefits (my dollars are spent close to my home) and practical benefits (the food just tastes better). We have a concern that the new HACCP guidelines could potentially make it cost prohibitive for small, local food producers to eliminate some of the food products that they provide or, worse yet, cease to operate.

Please consider the small, local food producers when you are contemplating these new guidelines.

Lisa Carlson-Douma
5740 Tenth Avenue South
Minneapolis, MN 55417
612.205.6626
lisacarlsondouma@gmail.com

Rhodes, Suzette

From: gzick59045@juno.com
Sent: Monday, April 05, 2010 5:03 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - Validation

WE have calculated the additional testing according to your proposed validation and it would put our plant out of business. In 26 years of usda inspection We have never had a product failure or problem. This is a kick in the butt to a small plant making ready to eat product. This proposal as it stands must be reviewed and some common sense thrown in to it.

Thank you
Garry Zick
Zicks Meats

Rhodes, Suzette

From: anders@newulmtel.net
Sent: Monday, April 05, 2010 8:26 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - HACCP Systems Validation changes

What are you thinking - this will put the small business owner out on the street!!! Our local sausage and fresh meat shop relies on selling to local businesses and no way makes enough to even begin paying the initialization fees for each product let alone the annual fees. You will put them out of business. I thought with the economy the way it is that small businesses were to be assisted not destroyed. There are enough regulations in effect without adding those that will destroy this business and the businessmans family, as its a mom and pop shop supporting 2 small children. Its tough enough nowadays to make it!! This business sells a quality product from a small storefront and would like to expand, but with the increasing government controls they are getting priced right out of the business!!!

Patti Anderson

White, Ralene

From: pastamami@bellsouth.net
Sent: Tuesday, June 08, 2010 10:15 AM
To: Draft Validation Guide Comments
Subject: Message from Internet User - new testing regarding HACCP validation

With the new regulation for testing small plants will be in jeopardy, especially ones like mine that have many items for sale. At a cost of \$70. for each test when we have over 400 different items this will put us out of business for sure. When we first started making meat filled pastas under the supervision of the USDA they did there own testing periodically, and all results came back negative, then they stopped asking for samples to send. Please do not force this new expense on us, we are a family business with less than 7 employees. We are not the only small business out there, I have read letters of other companies stressing this same point. This regulation could create a domino effect to the loss of jobs first with the plant employees, then the owners, then the USDA inspectors with less plants to inspect. This will cause unemployment to rise in an already struggling economy.

Rhodes, Suzette

From: Tim Kretzmann [tim@kretzmannstudio.com]
Sent: Thursday, May 20, 2010 12:01 PM
To: Draft Validation Guide Comments
Subject: New rules

To USDA and Tom Vilsack,

I really like your "Know Your Farmer, Know Your Food" campaign but I'm afraid the new rules requiring small processors to submit products from our local farmers to many new tests costing so much per product that implementation of these rules would put them out of business. This would run counter to the Know Your Farmer, Know Your Food campaign. We need our high quality products from our local farmers. The large processors need the FSIS oversight for sure but please don't put our local small processors and farmers out of business. Thank you for considering, Tim Kretzmann

Rhodes, Suzette

From: Gary Mavis [gmavis@twcny.rr.com]
Sent: Thursday, May 20, 2010 9:08 AM
To: Draft Validation Guide Comments
Subject: community based meat processing

...community-based meat processing is very important to many people in our rural area... we have few choices when purchasing food because we are rural...our farmers' markets have been most well-received and welcome in part because people want to talk with the people who produce their food... ...please consider us when you take the necessary steps in making the meat supply safer....

Gary Mavis
manager, LYONS FALLS FARMERS' MARKET

White, Ralene

From: Alessandra Rafferty [ohumanchild@gmail.com]
Sent: Tuesday, May 25, 2010 4:40 PM
To: Draft Validation Guide Comments
Subject: Please don't burden small slaughterhouses with unnecessary testing

The "one size fits all" inspection no longer fits current industry practice and consumer demand. These new HACCP requirements are going to be an unnecessary burden on smaller slaughterhouses that are already conducting safe practices. It's vital that we find a way to split the agribusiness mega-plants from the community-based localized plants within the regulatory structure.

Sincerely,

Alessandra Rafferty
Jersey City, N.J.

White, Ralene

From: George Haselton [gphrmi@gmail.com]
Sent: Saturday, June 05, 2010 1:52 PM
To: Draft Validation Guide Comments
Subject: new slaughterhouse rules

the proposed new rules that would increase testing are a good idea, for the largest of facilities as there is where the incidents are more likely to take place. There is a very positive movement for small slaughter operations as well as many established small operations in my area. Businesses like these are the heart of our economy, especially in rural locations. I would support "flexibility" for smaller operations as they cannot be subject to the same guidelines as larger more capitalized industries which have been setting the tone due to their influence. Once us average citizens learn and taste the difference, we want to purchase from our local, small farmers and want our government to assist these folks, not lay more barriers in their path.

Thanks,

George Haselton
Rockport Mechanical
14 Rockport Park Center
Rockport, Maine 04856
Office: 207-236-4172
Mobile: 207-691-1548
gphrmi@gmail.com

Rhodes, Suzette

From: Shepard, Ronald J - Eagan, MN [ronald.j.shepard@usps.gov]
Sent: Wednesday, May 19, 2010 5:06 PM
To: Draft Validation Guide Comments
Subject: comments

To Whom It May Concern,

I am a livestock farmer in SE Minnesota who direct markets his Bison meat directly to consumers. I am concerned about the new rules/compliance guide that is ongoing at this time. As a small to medium family farmer who has the greatest concern for consumer safety and a viable rural community, I am concerned that I may be priced/fee'd out of the market. Safety problems need to be addressed but at the same time, rules should only be done to solve problems where they exist. Most if not all food safety problems related to meat products are by large scale companies where product quality is hard to manage. Please address the problems where they reside and keep in mind that the rural communities, family farms, need protection from too many regulations. Safety is our top concern when direct marketing meat, solve the problems where they exist and ensure family farms can stay in business.

Thank you for your time and consideration

Ron Shepard, Shepard Buffalo Farm, 23103 465th St. Mazeppa MN 55956

White, Ralene

From: Kyle McCaskill [kmccaskill@uninets.net]
Sent: Wednesday, June 02, 2010 9:04 PM
To: Draft Validation Guide Comments
Subject: comments

The proposed changes to HACCP for small and very small USDA-inspected plants threaten to take down the few remaining local, community-based processing plants that remain, making healthy, local meats a rare commodity.

"One size fits all" inspection that treats industrially sized processors the same way as small ones is inappropriate and fails to recognize the differing circumstances within those processing operations.

We need to keep local infrastructure alive in this country. We need an inspection system that recognizes that the small plants do not put either the food economy or millions of people at risk in case of a food safety event.

My family and friends care about community-based meat processing and humanely produced meats, and we want to have the ability to purchase such food.