

White, Ralene

From: Kara Caputo [svstardust@aol.com]
Sent: Tuesday, May 25, 2010 2:34 PM
To: Draft Validation Guide Comments
Subject: comment

Dear Sirs and Madams:

I'd like to comment on the federal Food Safety and Inspection Service's draft rules for meat safety. I am concerned that a universal policy that makes an across the board guideline regarding food safety rules which encompass very small artisanal butchers and food processors the same way that high volume "factory food" processors is detrimental in several ways. I, along with first lady Michelle Obama, strongly believe in eating healthy and local, and am concerned that the proposed guidelines may make eating locally and sustainable difficult and possibly more expensive by reducing the already limited few producers out there. Using the same guidelines for factory producers and for very small producers doesn't make sense. For one thing, the same standards should not apply. The standards, in order to be fair, should vary depending on the volume processed. This is similar to the way that pilots and merchant mariners have to have federal credentials in order to operate the equipment that they use. For example, a pilot of a single engine plane is required to have a different license than the pilot of a 747, and likewise the small boat captain operating on the bay isn't required to have the same credential as the captain of a supertanker hauling millions of gallons of crude. The fact is, that a butcher who prepares one to five cows a day, is a much smaller and more specialized business. The people who work in the small businesses are skilled workers who by the nature of being smaller, have more roles, and generally have a responsibility to keep things clean and safe, firsthand. A facility that process 5000 cows a day, on the other hand operates like an work or assembly line, with unskilled workers and machines processing serious bulk product, of which the worker is responsible for only a small part of the overall picture. Requiring the regulations of the factory facilities to apply to the small producers creates more overhead and costs which ultimately will close down some of their operations. This in turn, will affect the small, family farmers who rely on the small butchers, and food processors. It has a negative snowball effect that ultimately will put many people out of work, and increase the costs for families who care to eat the product. In addition to smaller global footprint that eating locally helps reduce, it also helps keep our friends and neighbors working, which in this economy is of utmost importance. I'm all for food safety. My wife is a chef. However, I recommend that for the smallest of producers, there needn't be any change to the already outstanding job the USDA has done in regulating facilities. It's possible that there may be a need for more regulation of the largest factory producers to help prevent the possibilities of unhealthy disease or spread of food-borne illness, but let's not make things more expensive or harder for the small producers to stay in business by incurring more regulation and hence, more costs. Let's try to keep more Americans working.

thank you and best regards,

Adam Smith
(510)543-4955

Rhodes, Suzette

From: christy sturlaugson [christy.sturlaugson@gmail.com]
Sent: Friday, May 28, 2010 4:18 PM
To: Draft Validation Guide Comments

Dear Sir or Mdm.

I am very worried about the USDA's drafts of new meat testing regulations for small processors. I am really that these new regulations could put small processors out of business. Without those small processors, small farmers would not be able to sell their meat to people at a time when folks are really excited about local food. The number of tiny farms has grown greatly in recent years, and those small-scale farmers are selling their products to a small but enthusiastic and quickly growing market.

I do not believe that these regulations will make the public any safer. Most people who get sick eating meat are not eating meat from small processors. These processors also do not face many of the conditions that make the larger processors more vulnerable to spreading food-borne illness.

Please make exceptions for small processors in your rules. People want a choice about the kind of meat they buy, and small business people (processors and farmers) deserve a chance to make a go of it. They don't need any more obstacles in their way, and their work is not making the American people unsafe.

Thank you,

Christy Sturlaugson

Rhodes, Suzette

From: ellmersg@gmail.com
Sent: Thursday, May 27, 2010 2:40 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - HACCP Systems Validation

I writing with regard to "Draft Guidance: HACCP Systems Validation," published by USDA's Food Safety and Inspection Service FSIS on March 19, 2010."

I am deeply concerned that proposed new regulations for butchering meat could severely impact small, organic farmers who raise grass-fed beef. These small farms are important parts of the nations agricultural community, and provide valuable products to consumers. There is considerable demand for healthy and high-quality grass-fed beef from small farms. Costly new regulations that would force these farmers to have their meat butchered at massive conventional facilities would defeat the purpose of raising high-quality, carefully produced meat. I urge you to work with small, grass-fed beef farmers to ensure that they can to continue to pratice safe butchering procedures without undue regulatory burdens.

Rhodes, Suzette

From: Francis Herrero [francisherrero@yahoo.com]
Sent: Wednesday, May 26, 2010 6:59 PM
To: Draft Validation Guide Comments
Subject: One-Size-Fits-All Regulations for Slaughterhouses

I recently read an article about HACCP. My diet is based primarily around pastured meat from small, local farms. I purchase most of my meat at the farmers market, and occasionally supplement with grass fed meats from Trader Joes. I am concerned that the new proposed regulations will shut down the processors who help to supply me with my main source of protein.

I truly believe that local meat from animals raised on pasture is different from the meat grown in industrial feed lots, and different processing regulations should govern the meat from pastured animals. The pastured animals do not become sick in the same ways the industrial animals do, as they are not fed the same diet or kept in the same conditions.

Please change these regulations so that they only effect the slaughterhouses who created the problem in the first place: the Industrial Slaughterhouse.

Sincerely,

Francis Herrero
8539 Saturn st #5
Los Angeles, CA 90035

Rhodes, Suzette

From: dan@dbender.com
Sent: Wednesday, May 26, 2010 9:28 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - Hazard Analysis and Critical Control Point proposed changes

To whom it may concern,

I encourage your agency to reconsider proposed changes to the current HAACP rules. These rules will put an unbearable strain on many small processors and put them out of business.

Small farmers like the ones I source for all of my meat products rely on these processors to maintain the integrity of their products. In turn, the communities that rely on these sustainable, responsible and local farmers will ultimately be left out in the cold.

At a minimum I encourage your agency to consider applying the new standards only to larger plants which likely do need the increased standards.

Thank you for your consideration.

Respectfully,

Dan Bender,
Arlington, Va.

Rhodes, Suzette

From: Jay Dickason [jaydickason@hotmail.com]
Sent: Sunday, May 30, 2010 5:47 AM
To: Draft Validation Guide Comments
Subject: FSIS Draft Rules for Meat Safety

Hello,

Please adjust your new meat safety requirements to encourage local, small-scale production. There is a growing segment of the population which refuses to purchase or eat "factory meat", and I fear the new regulations will favor the "Big Four" producers which currently hold 80% of the market.

Local ranchers and farmers promote quality, humanely-raised, and healthier meats with a significantly smaller negative impact on the environment. Every measure should be taken to promote such operations and allow consumers to distance themselves from factory meats.

Greatly appreciated,

Jay Dickason
jaydickason@hotmail.com
San Francisco, California

Hotmail is redefining busy with tools for the New Busy. Get more from your inbox. [See how.](#)

Rhodes, Suzette

From: Kristine Fayerman-Piatt [kristine.piatt@newbury.edu]
Sent: Thursday, May 27, 2010 2:33 PM
To: Draft Validation Guide Comments
Subject: DraftValidationGuideComments

Although it is important and necessary that the U.S. Department of Agriculture and the Food Safety and Inspection Service (FSIS) prevent contamination of our meat supply by harmful pathogens, allowances for smaller meat processors and abattoirs must be made in the newly proposed HACCP rules. Other government agencies and regulations take size into consideration, and so should the USDA.

USDA policy consistently appears to favor large, agri-business above smaller, 'family' farms, a trend which has contributed to the escalating costs of obtaining quality meats, seafood and produce. These costs place high quality foods out of reach for most Americans. Our government must search for ways to improve access and help reduce these costs. The newly proposed HACCP rules work against these goals and should be revised.

Kristine Fayerman-Piatt
Operations Manager
Roger A. Saunders School of Hotel & Restaurant Management
Newbury College
Brookline, Massachusetts
617-730-7037

Rhodes, Suzette

From: kyleinsc1432@hotmail.com
Sent: Sunday, May 30, 2010 11:43 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - Proposed HACCP Requirements

I am writing in support of local farmers that are attempting to bring pastured, grass fed meats to consumers. These farmers/ranchers are trying to meet a demand for healthy and humane beef. While I am sure that most of you are aware of the benefits of grass fed beef and I will not reiterate its importance. For consumers like myself who have chosen to buy food not on price but quality I would hate to see regulations be forced upon smaller businesses who can not afford to comply with the new HACCP regs. It is my belief that they provide a safe product and have not seen the issues that large manufacturers have. I am not downplaying the importance of food quality regulation for the masses, but I do not think a one size fits all approach is the solution. I don't profess to be an expert in this field and would hope to leave an answer to those that are. Please protect our ability and right to choose buying from a local farmer and don't impose regulations that would put them out of business.

Kyle Adams
831 234-4350

Rhodes, Suzette

From: Joelle Berlat [joelle.berlat@att.net]
Sent: Friday, May 28, 2010 11:47 AM
To: Draft Validation Guide Comments
Subject: Small plant exception

I would like to comment on the HACCP system validation changes. It is unreasonable to expect that small processing facilities should comply with the same regulations regarding testing and controls that a large facility utilizes. I am not a participant in this industry other than as a consumer of meat and a voter. I understand the driving force behind these regulations and agree with them in principal as they apply to the large industrial processing facilities that mix meat from various suppliers and process large numbers of animals daily. However, these regulations are not logical for a processor that already knows exactly where all meat is coming from, and indeed is frequently processing meat not for sale to the public at large, but rather for sale to a person that specifically knows where the meat they are consuming was raised.

Forcing additional costs into a small production system utilized only by those of us that already take more responsibility for our own food choices is heavy handed and frankly insulting. We already pay more for our meat in order to avoid exactly the risks that you are attempting to mitigate in the industrial system.

I ask you to consider that no regulation can be "one size fits all" and implement a small processor exception to these regulations.

Thank you,

Joelle Berlat
1126 Chantilly Ln
Houston, TX 77018

Rhodes, Suzette

From: Jenny Sabo [saboranch@gmail.com]
Sent: Monday, May 31, 2010 5:15 PM
To: Draft Validation Guide Comments
Subject: Small meat Processors and HACCP regulations

To whom it may concern,

I am writing to say that we depend entirely for the survival of our grassfed beef business on our LOCAL MEAT PROCESSOR. They kill, cut, package, and "sausage" our meats for us. We then sell our meats directly to local customers. If that small facility were not here, we would be driving a 3 hour round trip for every animal, and another 3 hour round trip to get our meats, as there are very few facilities in Montana-- all far apart.

Our butcher, Montana's Best Meats in Whitehall MT is clean, open doored, and responsive to our needs. We know our Montana State Meat Inspector, and he is fully capable of keeping MT's Best Meats in full compliance with current rules.

PLEASE think carefully about creating a two-tiered plan for large, and SMALL, meat processors. Montana's local meat business is growing well, and providing many new jobs in our small, Montana communities. We used to have a butcher shop in every little town. We all eat meat, and we need these facilities. They pay good wages, provide steady jobs, and are crucial to the survival of all locally grown meat sales in Montana.

Jenny and Mark Sabo
Sabo Ranch
P.O.Box 65 -- 303 Pony Rd.
Harrison, MT 59735
(406)685-3248
saboranch@gmail.com- email
www.saboranch.com- website

Rhodes, Suzette

From: Chloe S. Flora [cflora@sussmanshank.com]
Sent: Thursday, May 27, 2010 1:45 PM
To: Draft Validation Guide Comments
Subject: Public Comment on HACCP Requirements

To Whom It May Concern,

I am writing in support of an exception for small-scale meat processing facilities in the changes to HACCP requirements. Under proposed changes all processing facilities would be required to staff a lab solely for end-product testing. For large scale facilities where millions of pounds of meat is handled daily, and individual attention to cuts is reduced, this makes sense. However small-scale facilities are able to insure food safety by tried practices that work on their level. A 'one size fits all' policy is not applicable simply due to the differences in scale between facilities. Not to mention that many small scale facilities are already taxed by current governmental regulations and many would go out of business if an exception was not created.

I am a vegetarian, and have been for 6 years, following work as a butcher. Seeing the meat come in from large scale plants is what put me off meat. However, I have eaten meals with meat from small slaughterhouses, farm-raised animals, and seen how rural communities can thrive. As consumer tastes become more local, and as food security on a local scale becomes more important there will be a greater need for small-scale processing plants. There needs to be an exception to protect our health and food supply from the control, and misuse, of large corporate plants.

Chloe Flora

White, Ralene

From: David Losure & Mary Schaeffer-Losure [losuredr@ncn.net]
Sent: Tuesday, May 04, 2010 4:52 PM
To: Draft Validation Guide Comments
Subject: FSIS Proposed Validation Regulations

Dear Food Safety and Inspection Service,

My husband and I are very concerned that the proposed validation regulations out of the Food Safety and Inspection Service will be costly for small meat processors, forcing them to increase prices for slaughter and processing, or worse, go out of business.

We purchase all of our meat through local farmers so that we have control of what is in the meat we eat and how it was raised. Those farmers all use small local processors/butchers, and for pork especially, those processors turn the meat into many different products. It appears that the proposed regulations would mean many samples of every product would need to be sent for examination creating huge costs that these small processing businesses would have to bear, which most are saying that they could not bear and would have shut down. The proposed new regulations could therefore, make it impossible for us to continue to obtain the only meat we will eat, since the large growers and processors who the proposed regulations would harm very little do not in our opinion create meat that is healthy to eat.

Furthermore the proposed regulations could severely hampering the growth of local and regional food systems which we rely on.

We have purchased meat from small processors for many, many years and feel that their products are already much safer than what we could get from any other source so please don't force them out of business or force them to have to charge us more because of new regulations.

Thank you.

Mary Schaeffer-Losure

P.S. Until a few years ago we raised free-range pork and used several small local processors for the meat we sold direct to customers. However the effect ethanol had on the cost of corn in the feed we were purchasing - it doubled in one month when the first corn for ethanol was harvested then later tripled - forced us out of business. Now we are musicians.

Flying Pig Fiddle & Banjo
Dave Losure and Mary Schaeffer-Losure
2919 260th Street
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515-325-6349
515-689-1434 c-Dave
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White, Ralene

From: Lucy Cameron [thistlesandclover@gmail.com]
Sent: Thursday, April 29, 2010 11:36 PM
To: Draft Validation Guide Comments
Subject: I am concerned about draft validation guide

I am concerned about the draft validation compliance guide because it will hurt small meat processors. The new validation systems would raise costs significantly for processors, driving them out of business or passing new costs onto farmers and consumers. These changes could severely hamper the growth of local and regional food systems.

We are farmers who raise a small number of cattle which we then have butchered at a small, local, federally-inspected meat processor. We then take the beef and sell it to customers at the farmers market and to a few local shops and restaurants. Our processor has already informed us that if this compliance guide goes into effect, they will not be able to afford to stay in business. If they go out of business, we too will no longer be able to run our business of selling local beef. There are no nearby federally inspected processors that are willing to take 1-5 head of cattle at a time, produce natural seasoning mixes (no Monosodium Glutamate, no nitrites), and/or work with us on our packaging to make it attractive to our customers.

Please do NOT put this guide into effect. You will be ruining all of the wonderful growth that "local foods" and "know your farmer" movements have made over the past decade. You need to ask yourself, of all of the meat that's been tainted over the past 10 years - what % of it came from small meat processors versus the giant processors? Laws and regulations need to make sense. If you're trying to protect consumers from bad meat, then regulate where the bad meat is coming from (mostly from the giant processing houses). Maybe you should limit the size/volume that processing plants can be? Sure, the price of food would go up, but it would be much easier to make sure that things are done correctly when the volume isn't so dizzying.

Maybe you should make these new sampling requirements FREE or subsidized, or a tax-credit to processors that are small. That way, you won't be putting all of these small family businesses out-of-business.

Thank you,

Lucy Cameron

--

Thistles & Clover
Adam and Lucy Cameron
Danbury Iowa
(712) 371-9861
thistlesandclover@gmail.com
www.thistlesandclover.com

Rhodes, Suzette

From: Ed & Pat Hedinger [pathed@tcaexpress.net]
Sent: Sunday, April 11, 2010 12:20 PM
To: Draft Validation Guide Comments
Subject: HACCP Validation

Once again government is stepping in and trying to take further control of something they know **nothing** about. I am talking about a very, very small meat processing plant in Paullina, IA.

Your idea of a HACCP validation system will ruin my husband's business. He only processes approximately 10 to 12 head of beef a **year** for inspection. He has a food for life program and he does butcher a lot of hogs for inspection. The meat he processes for inspection is probably about half of his yearly business. His gross yearly business on a good year is right at \$100,000. How is someone with this size of business suppose to make it if you demand this validation system? You mention there is significant oversight of a plant's HACCP systems. What plants? How may plants have had oversights? If only a few have had oversights, does that mean we all have to pay the price for their problems? Where are they? How big are they? How many people to they employ?

My husband has 2 part-time employees and himself working at his plant. My husband has owned and operated the Paullina Locker plant for over 30 years. He has never had an issue of contaminated or spoiled meat. The locker itself was established in 1932 and has **never** had an incident. My husband new the son of the man that built the locker. My husband worked for the son and eventually purchased the locker himself. The locker is a very valuable business for our small community. You have no idea, nor do I think you care, what happens when a small community (we are less than a 1,000 people) looses a business. We never get them back.

If this new regulation is passed and imposed on the small meat processing plants, they will become extinct and so will the Food for Life programs that provide precious food to the under privileged and to the soup kitchens that feed our homeless. Do you want to be responsible for this outcome? **You** will be if this is passed.

Ed and Pat Hedinger
Paullina, IA
712-949-3417

Rhodes, Suzette

From: Nicholas Heckett [nichec@earthlink.net]
Sent: Thursday, April 08, 2010 11:24 AM
To: Draft Validation Guide Comments
Cc: Bob Perry; Gregg.rentfrow; Chuck.Talbott@mail.wvu.edu
Subject: Concerns over changes to FSIS regulations.

Dear Sir/Madam - over the past 4 years, my partner, Dr Chuck Talbott and I have devoted hundreds of thousands of dollars to developing our project, Woodlands Pork. We have been breeding our animals, and developing a farming methodology that will produce an American ham of great character, one that can stand against the finest that Europe has to offer. We intend to achieve for cured meat what California has done for wine - create an American expression of a traditional product that neither apologizes to nor copies its progenitor. Our animals are hand raised in the forests of Appalachia, allowed to graze in pastures and then to glean the fall mast on the forest floor before heading out to the processor. The character of a fine ham, like a wine, is developed in the field, not in the processor or post-processor. The only ingredients in our ham are pork and salt, so the pork must be of the first order. Our production is small, but the possibility for growth is enormous. We are currently developing a business plan that will increase our production in the Cincinnati area by more than tenfold. This would lead to job creation and increased farm revenues in some of the poorest areas of our nation, the back valleys of Appalachia. Also we can reclaim the pride of our ham traditions that underpin the cultural and economic histories of the Pan-Appalachian region - from salt mining at what later became Charleston WV, to hog-farming across all the forests of the territory, to the processing and curing along the banks of the Ohio at Cincinnati. American dry-cured ham was a matter of local and national pride and can be again, if locally produced USDA inspected meat is not made a thing of the past.

However I fear that the proposed changes to the validation requirements will essentially spell the end to our project - despite the fact that we use no beef products that might carry e. coli contaminants. We depend on small scale slaughter plants in our local area, far from the centralized production zones of Iowa and N. Carolina. Large plants will not even process our animals as our production is too small. I beg you to consider the impact of your decision on struggling businessmen like me, the future of the local food movement in this country, the impact on traditional rural communities, and the need for a wide range of food options for all Americans.

I appreciate the need to regulate this industry carefully. I understand the importance of protecting the integrity of the national food supply. However our products, salted and dry-cured in a process essentially unchanged for three thousand years, produced with love and care, fully traceable back to the farm from the plate, cannot be said to threaten anyone's health, when consumed within reason. Please make sure that the small independent processors that businessmen like me depend on for our survival are not regulated out of existence. It is already very hard to meet all regulations for these processors - even the USDA inspectors, in my own personal experience, do not always understand the intricacies of the current regulations. Please be fair to small producers serving local communities.

Thank you for your time, and the great job you do, Nic Heckett - Woodlands Pork

Rhodes, Suzette

From: Woerner, Daniel
Sent: Thursday, April 08, 2010 4:04 PM
To: Draft Validation Guide Comments
Subject: Comments

COMMENTS: Having been an inspector, food tech, and consumer safety inspector for over 31 years, I don't see the logic in forcing any plant (large, small, or very small) to validate CCP-CL's for GRAS (Generally Regarded As Safe) processes, practices, and critical limits/values which have been proven adequate for years to be safe. Such processes I feel should be exempted would include the need for plants to validate cooking temps, chilling times & temps, pH, aW, salt concentrations, etc. which are supported by science. We tell consumers to cook turkey to 165°F., chicken to 163°F., etc... so why can't plant do the same thing? The plants are more sanitary than most household kitchens and will suddenly have to validate/prove something we already know is acceptable. Only the labs will benefit with a flood of sample products.

Cooking to Appendix-A and Chilling to Appendix-B have been around for years and prior to HACCP, we regulated product cooking temps and plants were required to cook to the regulatory temperatures. The scientific support of meat related to pH below 5.3, aW below .85, salt at 20%, etc. Again, only the labs will benefit.

I have no conflict in saying that plants who have "questionable CCP's or CL's" should be required to support them and validate them. An example would be where a plants states that they allow their product to air dry for 21 days at 70 to 110°F. to allow aW to below .85. Pathogens (especially staph) could grow at the temperatures they propose and no scientific support could probably be found to support such a CL so this type CCP-CL should be required to be validated by the plant.

Questionable data... YES.

Scientifically supported values... NO.

As inspectors, EIAO's, District Offices, PDD, we can always request a plant to show the safety of their food. We do this every day.

Thanks,
-DANNY-



Daniel R. Woerner
Consumer Safety Inspector
361 Sandy Lane Fredericksburg, Texas 78624
☎ Work – (830) 997-6915 ☎ Cell – (830) 456-3838
☎ Home – (830) 990-8992 ☎ Fax – (830) 997-9916
✉ e-mail - daniel.woerner@fsis.usda.gov or dannywoerner@yahoo.com

—Today's mighty oak is just yesterday's nut that held its ground—

In loving memory of AFGE Local 2873 President Larry Lenser

Rhodes, Suzette

From: Woerner, Daniel
Sent: Thursday, April 08, 2010 5:11 PM
To: Draft Validation Guide Comments
Subject: Comment #2

COMMENT: If we require validation of all Pre-req's such as metal detector, GMP written programs, temperature monitoring programs other than CCP's (storage, receiving, processing, etc. with upper limits which use the Bruce Thompkin Study as reference) then the plants will simply remove them from their plants rather than pay to validate them. Dr. Thompkin did that for the plants already when related to storage temps, product processing temps, etc.

Now I agree if they have a bogus-looking value not supportable by any supporting or scientific basis, then they should show the value/temp/number/frequency is a valid one. This is in need of validation, but changing the regs to do so is not necessary given out statute already in place where we can flag and question such questionable issues as it is already today. My responsibility as a CSI is to question the plant programs which are vague and unsupported.

I have seen plant's with CCP-CL's stating something like "**product temp may rise to 65°F. for no more than 4 hours during processing at which time the product must be placed inside a cooler or freezer and the temp must be brought back down below 44.6°F. before packaging**". These must be questioned and plant should be forced to validate the bogus ones (not the GRAS one supported by all food science universities and entities around the world). After notifying FSIS management, a regulatory control action would be initiated most assuredly until the plant can show the product is wholesome and not adulterated.

FSRE Training and every supervisor I have every had supports the field inspectors to question bogus values and that will never change. To force plants to validate so much will cause undue burden onto them at a time when they are barely surviving as it is. One plant I inspect employees 12 employees and can barely pay the lab charges for their LM Testing Program required y 9CFR 430 since they only produce fully cooked RTE products.

Thanks,
-DANNY-



Daniel R. Woerner
Consumer Safety Inspector
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—Today's mighty oak is just yesterday's nut that held its ground—

In loving memory of AFGE Local 2873 President Larry Lenser