

Rhodes, Suzette

From: allyson.sanborn@gmail.com
Sent: Wednesday, May 26, 2010 3:14 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - HACCP

I recently read an online article about HACCP. My familys diet is largely based around pastured meat from small, local farms. I am concerned that the new proposed regulations on slaughterhouses will shut down the processors who supply my family with our main source of meat.

Different processing regulations should govern the meat from pastured animals, largely because local meat from animals raised on pasture is different from the meat grown in industrial feed lots. The pastured animals are not fed the same diet or kept in the same conditions and industrial animals, and as such do not become sick in the same ways that animals from large-scale industrial farms do.

Please reconsider passing this bill. It is already expensive to obtain good quality meat, and this bill win increase that problem. Perhaps more importantly, it reduces consumers ability to choose the type of food we feed our family in our attempt to stay healthy. It seems clear that "one size fits all" inspection no longer fits current industry practice and consumer demand. It is my hope that the USDA will recognize this and NOT pass the HACCP bill.

Sincerely,
Allyson Sanborn

Rhodes, Suzette

From: gwen@adomaitis.net
Sent: Wednesday, May 26, 2010 10:34 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - HACCP

I am writing about the new guidance document for Hazard Analysis and Critical Control Point system validation. I do indeed appreciate the USDAs tireless work to make the food supply in the United States as safe as it can be. And I believe that the new guidelines will probably be very effective when put into use by very large slaughterhouses.

My concern about this document is its implications for small-scale slaughterhouses. These family-owned businesses are a critical part of local food systems. I am very concerned that the new requirements would put undue hardship on small slaughterhouses and may cause many to go out of business. At a time when our economy is so shaky, I cannot imagine how putting small businesses that directly put money into the local economy serves our best interest. Also, as a consumer, I greatly prefer to work with small-scale operations. They have a greater accountability to me, the consumer, and I believe this is a huge incentive for safety. When a business owner knows his or her customers know and talk to one another and care deeply about quality and safety, she works hard to ensure that quality is high and safety is paramount.

Please revise the new requirements to provide a feasible way for small businesses to comply with them.

Thank you,
Gwen Adomaitis
Farmington Hills, Michigan

Rhodes, Suzette

From: myshanana@gmail.com
Sent: Wednesday, May 26, 2010 3:56 PM
To: Draft Validation Guide Comments
Subject: Voicing opposition

To Whom it May Concern,

I writing to voice my opposition to the proposed changes to HACCP. They place an unsustainable burden on small, local meat processors and will like drive many (all?) of them out of business. For safety's sake, our food system needs to be *more* decentralized, not less. Local processors also keep money within the community and stimulate the economy.

I am deeply concerned about what these new regulations may do to my ability to have access to locally-raised, pasture-fed and humanely slaughtered meats. This directly impacts my family and our health. These options should be available to us. Please do not proceed with these changes.

Thank you,
Shana Herrin

Rhodes, Suzette

From: theresabush@gmail.com
Sent: Thursday, May 27, 2010 12:52 AM
To: Draft Validation Guide Comments
Subject: Message from Internet User - Small Scale farms and slaughter

Please do not hinder the growing local food movement: we need more small farms, small growers, locally raised meats, humanely treated livestock, etc.

Regulating the small players is not the way to a safe food supply: the problems come from CAFOs, from overcrowded and inhumane treatment of animals, not from lack of fancy equipment and regulations.

When we scale down and shop/buy/eat local, we support our local economy and give our neighbors income, and protect the environment, and vote with our food dollars for the right way to do it. No amount of regulations can do that: the large scale factory farming is a flawed system and inspecting it doesn't fix the pervasive issues.

Thank you for listening,
Theresa

Rhodes, Suzette

From: Anita Graf [mazaltaj@gmail.com]
Sent: Monday, April 19, 2010 10:13 AM
To: Draft Validation Guide Comments
Cc: marlo capoccia
Subject: USDA meat inspection rules: we're NOT happy

It is very important to me and my family that we be allowed to get fresh, locally produced meats at a reasonable price. The recent interpretations of USDA meat inspections that would require all producers to use the giant (and non local) processing facilities would completely shut out our small, neighbor-producers. This is wrong as well as contrary to the American value of supporting small businesses/entrepreneurs and freedom of choice. We don't believe this is a food safety issue; we believe it is a political tactic to run small producers out of business.

Please do not allow this to continue. Please do not allow regulations to keep us from supporting our local economy while following our dearly-held food values.

Thank you.

Anita Graf, Francisco Valoy, Sequoia Valoy, Ruby Valoy

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Anita Graf
323 North Albany St.
Ithaca NY 14850
607-275-3375

Rhodes, Suzette

From: Lorettaamaynard@yahoo.com
Sent: Friday, April 16, 2010 3:05 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - Testing

Blue Ribbon Meats
Cleveland, OH

HACCP programs are all based on the scientific documentation created by FSIS and has already proven that the procedures and guidelines followed by FSIS will provide a safe product. We have followed our HACCP plan since 1993 and changed it as necessary. We do test as per the FSIS guidelines for pathogens per guidelines in our HACCP program. This program has worked for us so why should we have to take on thousand of dollars in testing to come up with the same result. All products that are bought in are also following the same guideline. How can you warrant this kind of testing? With every product line that the government wants tested means more people handling products and in turn your going to have more problems with different pathogens. Is the government trying to turn everyone into vegetarians??? Who could possibly afford to buy meat by the time the consumer picks up tab for all the testing going on. I think the government has lost track on what it takes to run a company, the expenditures, employees, public safety. Do you know the cost of a recall? It would put a small company out of business so the smaller companies do everything they possibly can for public safety. Has the government really thought about what there asking the smaller companies to do....This needs to STOP NOW!

This will be forwarded to the Senate, all local TV stations, FSIS, Congress and who ever else I can get to read this.

Blue Ribbon Meats
Cleveland, Ohio

Rhodes, Suzette

From: Kathryn Engel [rkfarms@devonangus.com]
Sent: Friday, April 16, 2010 6:50 PM
To: Draft Validation Guide Comments
Subject: Comments - Draft Guidance on HACCP System Validation

4/16/2010

To Whom it May Concern:
Re: Comments - Draft Guidance on HACCP System Validation

The proposed new regulations for small meat processors will devastate my business, RK FARMS GRASS-FED BEEF, in that the resultant increase in processing costs will make my product economically unsustainable for myself as a farmer and for my customers as consumers.

My life's work is to make clean, healthful, natural and local food available and affordable to families in my community. Our communities' economy will be adversely affected by these new regulations by the compromise of considerable investment in livestock, improvements, equipment and feed on the part of several small beef operations. When we are forced out of business by the inaccessibility of affordable processing (or the closing of our local processing facility) the income stream and general economy of our region, upstate New York, will further deteriorate.

More processors are needed, not less.
At the very least, the necessary improvements and increased operating costs should be subsidized by stimulus money and tax credit to the processing plants.

Sincerely,
Kathryn Engel
small farmer, owner of RK Farms Grass Beef

PO Box 602
6401 Potomac Road
Trumansburg, NY 1488g
607-227-0380

Rhodes, Suzette

From: Bill Callahan [cowahen@dejazzd.com]
Sent: Monday, April 19, 2010 11:26 AM
To: Draft Validation Guide Comments
Cc: cowahen@dejazzd.com
Subject: HAACP System Validation Draft Guidance

At what point will additional testing make food truly safe? Perhaps we need to skip all of the intermediate steps and start testing at the interface between the fork and tongue.

I take food safety very seriously. I strongly encourage the food preparers in the 400 families that I help feed to follow safe food handling procedures and always use a meat thermometer. I am always observing my processors for any sign of sloppiness (Thank you FSIS for the service that you provide). I farm as cleanly as I know how.

Everyone involved in food, from farmer to consumer, must take responsibility for food safety. Additional testing during one step may give the consumer a false sense of security. The added cost and time involved will drive some of us (farmers and meat plants) out of business. In the end, will the consumer be safer?

Bill Callahan
COW-a-HEN Farm
Mifflinburg, Pa.

Meadow Raised Beef, Veal, Chicken, Turkey, Pork, and Eggs.

Rhodes, Suzette

From: Mary Kainz [kainzco@hotmail.com]
Sent: Wednesday, April 14, 2010 10:54 AM
To: Draft Validation Guide Comments
Subject: usda inspections

Dear Sir or Madam;

It's been called to my attention that the USDA is imposing or enforcing a 14 year old law that we have gotten along well without.

Our local locker is doing a great job employing people and processing meat for our local farmers. Enforcing this law would impose a great hardship on our local locker and all like it in small town America.

In my opinion we don't need, want or can afford this regulation. If one person suffered any ill effects from any meat processed by our locker or any like it they could not do business in small towns. We police our own and again don't need or want the USDA imposing their standards on us.

We need people in Washington helping us not imposing regulations we don't want or need, and can't afford. We are getting along fine the way it is, please do everything in your power to help us.

Thank You Robert Kainz

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Rhodes, Suzette

From: Anne Rockefeller [anne_rockefeller@yahoo.com]
Sent: Wednesday, April 14, 2010 7:08 PM
To: Draft Validation Guide Comments
Subject: small meat producer

USDA,

Please don't put this burden on our small meat producers since they are not the cause of the problem. I buy my meat locally since I know how the animal was cared for and feel it is safer to feed my family.

I think your agenda is to put the small farmer out of business as to increase the sales of the larger meat plants since they can afford these increases and welcome them. I think someone is being paid off to influence this burden onto the small farmer and thus put them out of business.

Keep the small farmer and meat producer exempt from this law that will drive up prices that families are already struggling to afford and direct it to the factory farm. The factory farm is the one causing the problems not the small meat producer.

Sincerely,
Anne Rockefeller
Friendsville PA 18818

Rhodes, Suzette

From: Don & Stella Reschke [dsreschke@verizon.net]
Sent: Wednesday, April 14, 2010 8:42 PM
To: Draft Validation Guide Comments
Subject: DISAPPROVAL OF USDA REGULATIONS

Dear Mr. Almanza:

My husband and I respectfully submits these comments regarding the Draft Guidance on HACCP System Validation that were publically released on March 19, 2010.

We are happy consumers of locally processed livestock. Our concern regarding process validation in inspected establishments of HACCP programs have prompted us to comment our concern. Through communication with our current butcher and other concerned meat processors it has become apparent that initiating systems validation in these establishments would considerably affect our costs as well. It is our belief that this will cause many of the federal and state inspected processing plants that our farmers rely on to be forced out of business, or pass the increased cost onto us and ultimately putting their business in financial jeopardy. The loss of income resulting from this will be devastating to these businesses because their business depends on very small and small establishments.

Please consider our comments and allow these small processing plants stay in business. They do a great job!

Sincerely,

Stella and Don Reschke
Owego, NY

White, Ralene

From: Robin Proebsting [rcp3a@virginia.edu]
Sent: Thursday, April 29, 2010 11:38 AM
To: Draft Validation Guide Comments
Subject: Comment on the validation of HACCP systems

I am writing to voice my opposition to the validation of HACCP systems.

As a consumer, I have far greater concern about factory farm-produced meats than about meat produced on small-scale factory farms, and it is my understanding that the validation of HACCP systems would disproportionately burden small meat producers. As food safety is a high priority for me, I oppose this new legislation because I believe it will actually make meat less safe by putting small producers out of business.

**Thank you for the opportunity to comment,
Robin Proebsting
1012 D Druid Ave
Charlottesville, VA 22902**

White, Ralene

From: Luke Tessum [luke.tess@hotmail.com]
Sent: Thursday, April 29, 2010 4:39 PM
To: Draft Validation Guide Comments
Subject: Validation Compliance guide

To Whom it may concern:

My name is Luke Tessum, I manage a grass based beef operation in SE Minnesota. 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.

I greatly depend on local processors to butcher and wrap all my meat to sell directly to my customers. These added costs to the processors will force me to raise my costs leaving the consumer with the burden of paying more with out added value. Since we know many of the problems with meat come from one of the large commercial outfits this draft validation only undermines the USDA's commitment to promoting locally raised goods. We raise healthy meat with no added hormones or antibiotics, our cows graze grass during the warm season and eat stored forage during the winter months. My customers pay for the peace of mind that the beef they are eating is humanely raised and they know where it comes from. This draft validation only hurts the goal of establishing a local arena to sell our farm goods.

Thanks,

Luke

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White, Ralene

From: Marty Konzen [haunsmeat@yahoo.com]
Sent: Monday, May 03, 2010 6:14 PM
To: Draft Validation Guide Comments
Subject: HACCP Validation

To whom it may concern,

I am writing this email in opposition to the validation issue. The first reason for opposing the issue is the cost. There is just not enough money to go around the way it is without having to validate processes that already work and are proven in this plant already. I will agree that some plants use studies to validate there processes that do not match the studies 100%. However, if the study is relevant to the plants process and prevents, eliminates, and/or reduces a food safety hazard reasonably likely to occur then by using that study validates the whole concept of HACCP.

The second reason in opposition is that even if we occur the cost of validating each and every process it still may not improve food safety. Please remember many of these studies are multifaceted to facilitate a wide parameter of situations not just one temperature, one size of meat, etc. Also many plants have enough records that validation could be done by using past experience.

I also would like to know why this was called a re-interpretation and not a new rule? I just read that it was not a new rule and am very inquisitive as to why we would not give this the same scrutiny as every other rule FSIS issues.

Please think also about the possiblity of many plants going out of business from this one "re-interpretation" which probably will not improve food safety anyway. Thank you for your time.

Marty Konzen

Haun's Specialty Meats

Dubuque, Iowa

563-582-9939

Rhodes, Suzette

From: Laura Fitzgerald [marxfitzgerald@gmail.com]
Sent: Wednesday, April 14, 2010 10:35 AM
To: Draft Validation Guide Comments
Subject: push back on the USDA

I am a consumer of organic and humanely-raised and -slaughtered meat, through a local meat-buying cooperative.

It has come to my attention that the USDA is poised to impose some extremely unrealistic requirements on slaughterhouses, which has the potential to make the organic and sustainable meat industry come to a grinding halt.

Small slaughterhouses and small-scale producers are not the problem (the factory farms and huge slaughterhouses are), but the requirements are set to affect even the smallest slaughterhouses. It could put them out of business, which will leave small-scale meat producers with no place to process their organic and sustainably raised meat.

Please reconsider this legislation, with the small-scale meat producers in mind.

Thank you -
Laura Fitzgerald
718-812-6348
Brooklyn, NY

White, Ralene

From: Jeff Bromberger [bromberger@cox.net]
Sent: Monday, May 03, 2010 6:06 PM
To: Draft Validation Guide Comments
Subject: Proposed FSIS regulations

Hello,

I am writing from Omaha, NE. I am an end-user or consumer, not a producer, but I am very concerned after speaking with several of my local producers about these proposed changes. I currently get 100% of my meat from local farmers and I am VERY happy to be able to do so. I simply will NOT eat meat from factory farms. These local farmers tell me that the proposed Food Safety and Inspection Service regulations will cause small meat processors to have to spend an enormous amount of additional money every year (one said in excess of \$100,000). Because of this, the small processors have indicated that they will simply go out of business. The farmers that depend on them have in-turn indicated that they will have to go out of business if this happens. That would then mean that my family will not have any meat that we can eat. I consider this to be the worst news that I have heard in a long time. Please consider some changes to these regulations, especially exemptions for smaller processors. Small, family-owned businesses are the only ones I trust. I do not want to eat meat from a large corporate-owned factory, and I am afraid that only those large operations will survive these changes.

Thank you,
Jeff Bromberger
2608 N 169th St
Omaha, NE 68116
402-510-3982

White, Ralene

From: Beth Dooley [bdirish@earthlink.net]
Sent: Thursday, April 29, 2010 11:29 AM
To: Draft Validation Guide Comments
Subject: Support Small Meat Processors! Rethink regulations so they're fair

I support local butchers and purchase locally sourced meat. Please reconsider the FSIS regulations that are burdenson to small processors and farmers. Please conduct an economic impact analysis for FSIS regulations.

PLEASE CREATE MORE EXEMPTIONS for small and medium sized processors!

A decentralized food system is a SAFER food-system. We need to be regulating to scale.

This type of regulation undermines the small local food system that's critical to our food supply and critical to our LOCAL ECONOMY.

**Beth Dooley
2322 Oliver Ave. S.
Mpls., MN 55405**

White, Ralene

From: Jay Jacobs [mamajessiniowa@yahoo.com]
Sent: Monday, May 03, 2010 1:45 PM
To: Draft Validation Guide Comments
Subject: Food Safety and Inspection Service

To Whom It May Concern:

What is going to happen to this country's great legacy of the family farm if you keep heaping more and more expensive regulations on the backs of an already stressed small ag industry? Factory produced meats taste vile compared to family farm raised meats. The feeding, drugging and inhumane slaughtering methods are the reasons why today's meat products are so disgusting! Small livestock farmers are not the ones mainly responsible for contaminated products that harm our population-- factory operations are! As a meat consumer, I am not interested in purchasing anything from the likes of Con-Agra. I support locally grown foods, the farmers who produce said foods and the farmer's markets that provide the venue.

I'm 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. USDA needs to rethink these new rules; they don't increase food safety and sure don't help local food systems or family farmers. Wake up and smell the coffee! This legislation will surely drive the small producers out of business. As someone who longs to be more self sufficient by running a modest farm someday, FSIS is like a dark cloud that obscures my dream.

Sincerely,
Janet Jacobs