

## Rhodes, Suzette

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**From:** Chris Bole [cmd.nys@gmail.com]  
**Sent:** Monday, April 19, 2010 8:55 AM  
**To:** Draft Validation Guide Comments  
**Subject:** Comments - Draft Guidance on HACCP System Validation

**Chris Bole**  
**72 Sandelwood Dr.**  
**Getzville, NY 14068**

April 19, 2010

### Address

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

Email: [DraftValidationGuideComments@fsis.usda.gov](mailto:DraftValidationGuideComments@fsis.usda.gov)

### Re: Comments - Draft Guidance on HACCP System Validation

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Dear Mr. Almanza:

I am respectfully submitting these comments regarding the Draft Guidance on HACCP System Validation that were publically released on March 19, 2010.

As a consumer and American with the right and independent authority to choose where, how and from whom I buy my food, and as someone in a family who relies on the trusted services of my local farmers and small meat processors, I have concerns regarding process validation in inspected establishments through HACCP programs. Through communication with one of our current farmers it has become apparent that initiating systems validation in his preferred meat processor establishment would considerably affect both of their businesses. Consequently, my family and I would be affected. It is our belief that this will cause many of the federal and state inspected processing plants that we rely on to be forced out of business as well as deny my family's choices for food sources. The loss of income resulting from these proposals will be devastating to many (e.g., Leona Meat Plant), and our community's food choices depend on this and other similar local meat processing establishments.

In this country, forced centralization of meat processing (as well as other industries), by means of shutting down small plants through un-necessary or un-fair or oppressive economic and regulatory mandates, seems to be a CONTINUING and BAD practice of our State and Federal government. The decentralization and diversification in size and scope of meat processing plants, regulated locally with Boards representing all concerned parties (local processors, local public health, local consumers, etc.), is the best way to provide consumers with appropriate food choices, build consumer knowledge/confidence/trust in their suppliers, reduce government intrusiveness and costs/tax burden, and establish economic growth and stability for all.

I appreciate the chance to comment on the Draft Guidance on HACCP System Validation. Thank you for your time and consideration.

Sincerely,

Chris Bole

## Rhodes, Suzette

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**From:** Ruzicka296@aol.com  
**Sent:** Tuesday, March 30, 2010 11:46 PM  
**To:** Draft Validation Guide Comments; jschnell@iowapork.org  
**Subject:** Re: Comments on FSIS

I'm writing to you in regards to the comment period on the subject that the USDA says processors must validate prerequisite programs. I'll respond to this in different paragraphs in regards to what I think it will do and mean to this sector of the industry both as a regulatory matter and financially.

As far as financially, I think it will be devastating. Those that will be able to survive this part of it, your involvement with us will be totally altered.

As to the fact that the guidelines we are using are no longer acceptable; HACCP tells us that history is part of validation, and we have over a 10 year history. HACCP also tells us that you can't test your way into results. Testing only verifies that the process that we are using is working. Also that the ongoing testing that is required by FSIS and State are part of the continued verification of that validation. The different States and their continued success overall should show this, if you look at the history of recalls which HACCP tells us to do, the major majority of them have not been with the small plants and their procedures.

Now, if for some reason we would have to conduct all this testing, these individual results for plants would be considered trade secrets and probably protected like the 11 herbs and spices of KFC that very few people have ever seen. Any standards that you would then try to impose, would have been admittedly not prudent in the different plants for the fact that all plants are different in how they are set up and procedures they do, as well as the number of employees handling the product. FSIS would actually have to also run their own battery of tests in each individual plant across the U.S. to meet these plants actual set ups. This way FSIS tests would match what would be considered our controlled test. The fact that all plants employees and equipment are all different FSIS tests would have to match our exact testing.

If our state plants do accept those standards that are set forth by meat scientists, labs, universities, state and national organizations, I believe the FSIS would have to recognize and accept this. I've come to this conclusion by the precedent set forth by the FSIS. The precedent that I refer to is that of which they call industry standard, in which they let big packers do things that are actually unlawful but accept them as industry standard. I refer specifically to that of phosphates in fresh meat and now in meat patties because of the trim off the pre packed cut lines that they are ending with. So if individual states or small packers across the U.S. accept guidelines given to us by meat scientists, labs, universities, state and national organizations, as industry standard, I feel that they would have to be accepted as industry standards.

Since starting this letter, we have been given some preliminary pricing on how much this would cost which was shocking! It would cost plants approximately \$100,000.00 to accomplish this plus the ongoing cost of maintaining. This leaves me unsure if any small mom and pop shops could survive this.

Ruzicka's Meat Processing

Jeff Ruzicka  
Phone # 319-310-7034

## Rhodes, Suzette

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**From:** Arion Thiboumery [arion@iastate.edu]  
**Sent:** Wednesday, March 24, 2010 8:42 AM  
**To:** Draft Validation Guide Comments  
**Subject:** Draft validation compliance guidelines

Hello,

I have a question about the draft validation compliance guidelines:

Has the Agency made available the data that it has used to make the determination for the need of these guidelines?

Specifically, Mr. Almanza's 3/19 letter, middle of page 3, states that

"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."

Having read the letters (Industry & Almanza's) and attachments completely, these incidents (and the desire to make such incidents never happen again) seems to be the key factual driver here.

So basically, I'm curious to know about the incident data because if the "key perimeters" were not followed then this would appear to be exclusively a "key perimeters" problem and not a problem that would be necessarily aided by outcome testing.

If these incidents were not "key perimeter" problems and were in fact caused by other, nebulous factors ("the unknown unknowns") then this would seem to indicate either

A) inadequate hazard analysis or

B) inconsistent circumstances that defy sampling and the predictability tenant of natural science (and HACCP), such as operator error.

Please let me know if this sounds totally irrational. I just don't get how we can say "HACCP is scientifically sound" and then simultaneously say:

science + key perimeters ≠ predicted outcomes

And thus we need to test all three.

Thank you,  
Arion Thiboumery

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Arion Thiboumery, Ph.D.  
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[www.nichemeatprocessing.org](http://www.nichemeatprocessing.org)

**White, Ralene**

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**From:** Andrew Harker [aharkemp@gmail.com]  
**Sent:** Saturday, June 05, 2010 7:08 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Federal Food Safety and Inspection Service's draft rules for meat safety

To whom it may concern:

Thank you for inviting comment on "Draft Guidance: HACCP Systems Validation," published by USDA's Food Safety and Inspection Service (FSIS) on March 19, 2010, proposing new and expanded testing and recordkeeping requirements for all meat and poultry establishments operating under inspection.

While the goals of the draft regulations are laudable, I caution that the FSIS not adopt a "one size fits all" approach to ensuring meat safety. Rules and regulations that would be appropriate for large-scale agri-biz would not necessarily be appropriate for smaller farms and producers, such as those represented by the Niche Meat Processor Assistance Network.

I urge your organization to construct carefully the rules and regulations for all sizes of business to ensure consumer safety.

Thank you.

Andrew Harker  
Redwood City, CA 94062

**White, Ralene**

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**From:** wgeadelman@aol.cpm  
**Sent:** Tuesday, June 08, 2010 9:27 AM  
**To:** Draft Validation Guide Comments  
**Subject:** Message from Internet User - Locker Inspections changes

Iowa has many small lockers located in small towns - one of few businesses still able supporti the local economy. Myself and others in my family have used their services for years without any health problems caused by using their products and services.

There a already rules and standards im place - why more??? If a locker is not providing good service and product the local consumer will not shop with them and that will take care of problem.

Increased government inspectons rules will cause an increase in expences and force them to close. Our only choice left will be to shop at large super markets located many miles away and further cause the decline of employment and business opportunities in small towns.

If that is the goal of currant government then impose these rules.

Wayne Geadelmann  
Adel, IA

## **White, Ralene**

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**From:** daig0004@umn.edu  
**Sent:** Tuesday, June 08, 2010 11:56 AM  
**To:** Draft Validation Guide Comments  
**Subject:** citizen concerns re. proposed FSIS rules

**Dear USDA Secretary Tom Vislack:**

**We live in Minneapolis, Minnesota. Through our local cooperative grocery and other farm-in-the-market locales, we have been purchasing and eating meat from Pastures A Plenty in Kirkhoven, Minnesota, for around 7 years. All of these products are delicious; some, particularly their pork shoulder, are the best we've ever tasted. Local sustainable farms remind us of how good meat used to taste before industrial agriculture made red meat unhealthy, and we want our meat coming from local, sustainable farms that raise and slaughter animals humanely. In fact, we used to be vegetarian, and we'd sooner go vegetarian again than return to industrial, mass-produced meat.**

**We were disheartened to recently learn of the new FSIS rules proposed and their impact on local, sustainable farms and their processors. The expense alone seems unfair to smaller operations. And it would seem to undermine the USDA's own "Know Your Farmer, Know Your Food" campaign. Pastures A Plenty products are marketed only in the state of Minnesota, and the case has not been made that small processors are a danger. On the other hand, the large meat processors, with their huge operations and interstate marketing capacities, are the ones involved in virtually every food safety scare at the national level. The implications are clear: We need to more actively support and empower these smaller, locally-based operations; and we need to tighten up regulations and inspections at major plants, where it is our understanding that inspectors do not even have the power to stop slaughter if they see something questionable.**

**We understand that food safety is your concern. But we also feel you must find a solution that prioritizes small farms and producers rather than one that threatens to put them out of business, effectively removing competition for Big Agribusinesses.**

**Thank you,**

**Eric Daigre and Melissa Licht  
Minneapolis, MN**

## Rhodes, Suzette

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**From:** George A [georgea@albertsmeats.com]  
**Sent:** Thursday, April 01, 2010 7:37 AM  
**To:** Draft Validation Guide Comments  
**Subject:** New Validatio Guidelines

Al Almanza, Where does the FSIS officials come up with such idiotic ideas? Will all this testing mean, that our food supply will be safer? All this testing will be a financial drain on small to medium plants between the testing and the paperwork.

With all the preventative measures we have now, why are we still having ecoli outbreaks? We have listeria outbreaks on products other than meat, what about all the imported products from china, we know their safe! Zero Tolerance is impossible, you're aware of that!

I guess eventually all small business in this great country will close, thanks to a bunch of government leaches ( an insect that lives off of another host, produces nothing and pretends to contribute to society - as in fishing bait).

Hopefully you will use your education and common sense to make our food supply safer by focusing on the imported products coming into this country and leave our FSIS system alone. Our products in this country are very safe, safer than ever.

Sincerely, George A. Weiss V.P.

Feel free to give me a call 724-948-3321  
email [georgea@albertsmeats.com](mailto:georgea@albertsmeats.com)

## Rhodes, Suzette

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**From:** jacqueline.haviland@fafadvisors.com  
**Sent:** Thursday, May 20, 2010 10:15 AM  
**To:** Draft Validation Guide Comments  
**Subject:** Let My Meat Producer Keep Producing!

Hello,

I am a customer of a small meat co-op in Minnesota. We get excellent beef, pork and chicken from three small local producers. This is part of my commitment to the idea of "know your farmer, know your food". I really believe in this idea -- and I believe it makes me and my family safer and healthier. In addition, I am committed to the humane processing of animals for meat. And our small meat co-op allows me to see for myself that this is happening with each cut of meat I put on my table.

Unfortunately, the proposal for new rules that increase testing at all meat processing centers threatens this small operation. The testing protocols may be appropriate to facilities that process thousands of animals a day, but at our smaller processing facility, the testing is simply impossible to implement.

Please, don't shut down my farmers. Please support this community's efforts to buy local, to support independent farmers -- to know our farmers and know our food. Please exempt small producers from this regulation!

I understand the need to regulate meat production. I am horrified by the conditions at large meat processing facilities -- but I don't believe the current proposal is the right way to go about this. Empower your inspectors, get eyes on the ground and stop behavior that's unsafe while leaving the small producers to continue to provide us with a safe alternative to mass market meat.

Sincerely,

Jackie Haviland  
4135 Pleasant Ave. S  
Minneapolis, MN 55409  
612-823-7843

## Rhodes, Suzette

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**From:** Joan Simpson [simpbat@usfamily.net]  
**Sent:** Friday, May 21, 2010 11:36 AM  
**To:** Draft Validation Guide Comments  
**Subject:** Proposed rules re: small meat processors

The Food Safety and Inspection Services (FSIS) division of the United State Department of Agriculture (USDA) is proposing new rules which will negatively impact small meats processors. These rules run exactly counter to the USDA's much promoted local foods "Know Your Farmer, Know Your Food" campaign--probably putting many local farmers out of business.

I want to choose the food I will eat, I want to buy locally, I want to support local rural economies, & I want to eat meats from animals that have been humanely raised and slaughtered--healthy, wholesome local meats are important!

I feel that the case has not been that small processors are a danger, and that it is large processors that are involved in every food safety news story I see. Why don't federal inspectors have the power to stop slaughter at major plants if they see something bad? The state equal-to system has the built in safety that the meats are marketed in state only. Healthy, wholesome local meats are an important !

Thank you for your attention in this matter.

Sincerely,

Joan Simpson

## Rhodes, Suzette

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**From:** joannholm@aol.com  
**Sent:** Thursday, May 20, 2010 11:00 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Making purchasing from small farmers impossible

To Whom it may concern:

I am a consumer that enjoys purchasing meat from Pastures A Plenty, a small farm in Minnesota, processed out of the Belgrade Meat Center plant. We understand their business and farm is in jeopardy and wish to express our disappointment in government policy occurring in their regard.

We want to choose the foods we eat, to buy locally, and to support local rural economies. We want to eat meats from animals that have been humanely raised and slaughtered. I on a number of occasions have bought meat, especially hamburger from the large grocery stores....that has caused stomach upset....it never happens when I buy meat from this farmer. I enjoy meats that have been processed without harmful nitrates.

We are hopeful there will be wise decisions made in this regard, and the rights of consumers honored and respected...it is the major plants in the news with problems of food contamination....We hope our expressed opinions might make a difference.

JoAnn Holm  
New Brighton, MN

## **Rhodes, Suzette**

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**From:** Kahnke, Jane [Jane.Kahnke@rsmi.com]  
**Sent:** Thursday, May 20, 2010 11:30 AM  
**To:** Draft Validation Guide Comments  
**Cc:** Pastures A Plenty  
**Subject:** small meat processors harmed

To: USDA Secretary Tom Vilsack

Dear Mr. Vilsack,

I have been informed that the Food Safety and Inspection Services (FSIS) division of the United State Department of Agriculture (USDA) is proposing new rules which will impact small meats processors greatly and potentially make meats from here at Pastures A Plenty and Red Tail Valley unavailable for me to buy. I have also been informed that these rules run counter to the USDA's much ballyhooed local foods "Know Your Farmer, Know Your Food" campaign.

I started buying products from these farms due to severe health problems of my 12-year-old daughter, Nina, who was getting daily severe migraine headaches, fatigue and abdominal pain. Her nutritionist and doctor had instructed me to buy natural and uncured meats where antibiotics and other harmful additives had not been used. Since her diet change, Nina's health issues have greatly improved and her migraines are now seldom and minor. Not only is the meat processed in a way that is healthy for my daughter, it is far superior to what is available at local grocery stores, even superior to my food co-op.

Please review the rules so that meat processors like Pastures A Plenty and Red Tail Valley are not forced to close down.

The Kahnkes—Jane, Pat, Sam, Nina and Naomi

Jane Kahnke, Support  
RSM McGladrey, Inc.  
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## Rhodes, Suzette

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**From:** Kari Tholkes [kat@mtinternet.com]  
**Sent:** Thursday, May 20, 2010 8:30 PM  
**To:** Draft Validation Guide Comments  
**Subject:** LOCAL MEATS--Response Requested

USDA Secretary Tom Vilsack,

I am writing to request further information regarding The Food Safety and Inspection Services (FSIS) division of the United State Department of Agriculture (USDA) is proposals for new rules which will impact small meats processors greatly. I understand the need to produce safe foods, and appreciate the hard work my government has done regarding this issue.

What I need to know is "will these rules affect the small meat processors, same as the big?" we have a fantastic butchery shop and slaughterhouse in Cannon Falls, MN and I would like to see one in EVERY SMALL TOWN, feeding Americans REAL FOOD that has been HUMANELY TREATED in the slaughterhouse process. I've read The Omnivores Dilemma and the In Defense of Food, by Michael Pollan and I firmly believe our government needs to HELP small corporations and family farms, not discourage them by implementing the same structure for big business...does that make sense? Have you and your department read these books? They are very illuminating and I highly recommend them. Mothers across the nation are choosing healthier options for our children and our families. I am not alone.

I'd like to hear your take on these new regulations your department is suggesting/considering and how they might impact family farmers and specifically our slaughterhouse in Cannon Falls, MN.

Kari Tholkes  
612-208-2569  
[kat@mtinternet.com](mailto:kat@mtinternet.com)

3512 32<sup>nd</sup> Avenue NE  
Saint Anthony, MN 55418

## Rhodes, Suzette

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**From:** knackerman1@verizon.net  
**Sent:** Tuesday, May 11, 2010 5:35 PM  
**To:** Draft Validation Guide Comments  
**Subject:** validation comments

This letter is to comment on the proposed validation requirements for HACCP plans in USDA inspected meat plants.

This regulation would be an unfair burden on small plants, especially those with multiple products and CCPs. While large businesses can implement this type of regulation at minimal cost per pound, the same testing procedures would cost the small processor enough to cause a price increase that would put them at a competitive disadvantage.

Large and politically powerful entities should not be allowed to impose disproportional costs on smaller competitors through the use of regulations.

There is no scientific basis for this requirement and no quantifiable increase in the level of food safety as a result of it's implementation. The FSIS is charged with maintaining a system that prevents contaminated meat from entering the food supply, not applying arbitrary rules that cripple small business.

All government services should be paid for by those who demand them. If the American public demands that this regulation be put into practice, then the American public should fund the testing required to ensure that all producers are on a level playing field.

Until a scientific basis and a risk analysis show that this regulation has any merit,  
**IT SHOULD NOT BE IMPLEMENTED!**

Jim Boland  
President  
JCNB Inc.  
509-330-8569  
910 N Almon  
Moscow, ID