

**Rhodes, Suzette**

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**From:** Lisa Niforopulos [nifo2@earthlink.net]  
**Sent:** Thursday, May 20, 2010 4:53 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Keep Pastures A Plenty Standing

Dear Sir or Madam,

For years my husband and I have enjoyed buying pork from Pastures A Plenty, a producer of high quality pork products based in Kerkhoven, Minnesota. I understand that the Food Safety and Inspection Services division of the U.S. Department of Agriculture is proposing new rules that would impact small-meats processors. Belgrade Meat Center, processor for Pastures A Plenty, would be required to submit their products (pork, for instance) to thirteen tests per product, costing as much as \$10,000 per product to initiate and another \$3,500 annually to maintain.

Pastures A Plenty offers about 40 different beef and pork products in addition to a variety of fresh cuts. Implementation of the FSIS's new rules would likely shut down Pastures A Plenty.

I prefer to choose the food I eat. I prefer to buy locally from farmers I know in order to support my local rural economy. Above all, I enjoy eating meat from animals that have been humanely raised and slaughtered.

It seems that the FSIS has not made the case that small processors are a danger. In fact, large processors are involved in every food-safety story I read. Why don't federal inspectors have the power to stop slaughter at major plants if they see something questionable? In Minnesota, the equal-to system requires that the meats are marketed in-state only. Finally, wholesome meats are an important part of the fight against obesity in our nation.

Keep small-meats processors in business, please. Thank you for your attention to this matter.

Truly,  
Lisa Niforopulos

## White, Ralene

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**From:** Kevin Dufrene [Kevin@eatdeer.com]  
**Sent:** Wednesday, May 26, 2010 10:33 AM  
**To:** Draft Validation Guide Comments  
**Subject:** comments

To SIS comments recipient:

Upon reading the draft guide document, it was assumed that little consideration was given to the ability of very small low volume establishments to meet compliance with the parameters of this guidance. The 1st part of validation can be obtained by using currently available information (i.e. Appendix A or B). However the 2nd part as defined for low volume processes may be unattainable for very small, very low volume establishments. A vs. vlv est. that produces less than 1000 pounds annually may not have the resources to support the level of in plant data collection expected. For a plant this size, initial microbial load testing and finished product testing can become so burdensome as to prevent this business from operating. In this manner a business this size would be denied an opportunity to operate based on regulatory requirements and not food safety risk. Even the expectation by FSIS of the use of a data logger can become overly burdensome. With the number of samples as defined expected, it would become impossible to achieve compliance and remain in business. An example would be a facility that produces less than 1000 pounds of product annually to provide for monthly food contact surface testing at a cost of \$70 monthly( \$30 for the test, \$15 for shipping and \$25 for the pickup charge), thereby being \$840 annually. In addition 2 pounds of finished product submitted for FSIS laboratory sampling on 3 occasions would add another \$30. Assuming this product sells for \$5 per pound, this facility would be spending \$870 or 16.8% of production for testing annually. As you can see this would make it impossible to remain as a facility not because of a food safety concern, but because it would be cost prohibitive to achieve compliance. Would it not be more advantageous to establish levels that vs vlv facilities could remain in compliance over eliminating them. We all want safe food and should strive to achieve that. However no food production facility will be able to remain in compliance and no small business will be afforded the opportunity to grow if FSIS has expectations that cannot be achieved. If a facility has records showing compliance with guidance information( i.e. Appendix A & B), should not that be considered as validation of a system operating within expectations? Is not that what is considered "other information" as stated in the elements of validation?

Kevin Dufrene

## Rhodes, Suzette

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**From:** Jennifer Conklin [jenna.artist@gmail.com]  
**Sent:** Monday, April 19, 2010 8:32 AM  
**To:** Draft Validation Guide Comments  
**Subject:** please protect small local organic meat

*THE CURRENT TROUBLE: USDA is reinterpreting some regulations that have been in place for several years to mean that all butchers/slaughterhouses/meat processors with a USDA seal must significantly increase the amount of testing they do.*

*If we lose some, even one or two, of our small USDA processors we also likely lose some of our livestock farms which limits supply. As I mentioned above, most of our farms book appointments months to a year in advance to get their animals in to the limited space of our local butchers. Our farms can't compensate for the amount of money they lose by not getting an animal to slaughter on time because it eats into their already limited profit margin. (No kidding- I don't know one of our farms where the farmers make even minimum wage. Most have off-farm jobs to make ends meet. They farm because they love it and the lifestyle. They're not getting rich and they COULD end up bankrupt...)*

*For those farms that made it through the loss of a slaughterhouse or two, it would mean a price increase of \$.50 to \$1.00 per pound of meat sold. If you're currently buying local meat you know it already costs more than large (factory) farmed meats and such a drastic price increase is likely to scare away new converts to local foods, those with the lowest incomes, and even people like myself who want to eat locally but who have a limited food budget.*

Please have a separate set of regulations for small processors or help small processors get grants to comply with the new interpretation of the regulations. Being able to buy locally grown organic meat is good for the environment in saved transportation pollution, it's good for my local economy, it feels good to be supporting a neighbor and their chosen lifestyle, and - most important - because it's a small farm I can visit myself, I know the animals are treated humanely and not as a component in a factory. They're allowed to roam and wander and live an animal-type life.

Because of my finances, I can seldom afford to purchase organic local meat now: if the prices go up from lost farms because of lost processors, with my current finances, I'll never be able to afford the meat that feels morally safe, not just physiologically safe. With the reinterpretation of these regulations for meat processors, please protect the small processors from having to shoulder the \$500,000 initial investment and \$180,000 yearly maintenance like a huge factory processor will. There must be some way to support local small farms and keep meat safe.

thank you,  
Jennifer Conklin  
Ithaca NY 14850

## Rhodes, Suzette

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**From:** D Bender [bendingwillows@yahoo.com]  
**Sent:** Tuesday, May 18, 2010 1:26 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Draft Guidance on HACCP System Validation

To whom it may concern:

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

I buy most of my meat directly from Oklahoma farmers. All of the meat products they sell are processed in locally owned processing plants inspected by the USDA or the Oklahoma Department of Agriculture.

It is my understanding that FSIS is proposing to require that meat processors do a series of expensive tests to validate their HACCP plans. Local processors indicate that the costs to them would run between \$5,000 and \$50,000/year, depending on the number of their products. This is a prohibitive cost for small locally oriented meat processors, and if this guideline is enacted as a regulation, it will virtually destroy the small processor market. This would put local meat producers out of business.

I am not aware of any problems in food safety caused by local meat processors in Oklahoma. When I read of meat recalls, they aren't coming from small processors, they are coming from giant multi-state processing operations. Laying this new regulatory burden on small meat processors is unnecessary. It would cause the destruction of important heritage businesses that operate in sustainable ways. It would damage the economies of rural areas and destroy jobs in an era when job destruction is already a real problem. I would lose access to locally grown, locally processed meats.

For all these reasons, I strongly request that the Draft Guidance on HACCP System Validation be revised to clearly state that no in-plant microbial testing is required when an establishment is following the long-standing, safe processes of HACCP.

Sincerely,  
Danyelle Lechner

## Rhodes, Suzette

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**From:** Mike Lints [mlints@alum.mit.edu]  
**Sent:** Wednesday, April 14, 2010 11:13 AM  
**To:** Draft Validation Guide Comments  
**Subject:** Proposed HACCP validation process

I am addressing my comments to you primarily as a consumer of meat products from a small-scale meat processing plant. I am very concerned that the proposed validation process would have a very negative impact on me as a consumer.

For numerous reasons pertaining principally to health, I buy most of my meat from small-scale organic farmers. In the past five or ten years, the amount of effort and planning required to find sources for such meat has decreased significantly. In fact, I now buy almost exclusively from a few local farmers, who all have their meat processed at a small, local meat processing plant. This plant processes a wide variety of products - I count twelve different products just in the beef hind quarter I purchased last month - but at relatively low volumes. As I understand the proposed validation process, separate testing would be required for each different product. This would have a disproportionate impact on small-scale processors with a wide variety of products, and does not seem necessary in order to ensure the safety of those products. As I further understand it, the cost of such testing might add somewhere between \$0.50 and \$1.00 to the cost per pound of the meat that I buy.

In addition to the negative economic impact the proposed rules will have, I'm also concerned about issues of food security. If people cannot afford to pay the extra cost that would be imposed by the proposed rules, then our local plant, as well as many others, may go out of business. In the event of a disaster or emergency of any type, I would not want to be reliant solely on large scale meat processors hundreds of miles away. A food system that includes both large- and small-scale processors will be much more robust, and better able to recover if something bad happens.

I urge you to reconsider the proposed rules, particularly with regard to the disproportionate impact they will have on the small-scale processors that I rely on for most of my meat.

Sincerely,

Mike Lints  
2971 Halfway Brook Rd  
Brookfield, VT 05036

## Rhodes, Suzette

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**From:** L [lbrocato@stny.rr.com]  
**Sent:** Tuesday, May 18, 2010 8:29 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Comment on Reinterpretation of regulations for meat inspections

I understand the USDA is reinterpreting some regulations that have been in place for several years to mean that all butchers/slaughterhouses/meat processors with a USDA seal must significantly increase the amount of testing they do.

I also understand that, small processors are being asked to adhere to the same regulations as immense processors even though they have a limited (financial) ability to comply. The numbers estimated by the trade associations are an \$500,000 initial investment by any single meat processor with \$180,000 in maintenance yearly. Our farms can't compensate for the amount of money they lose by not getting an animal to slaughter on time because it eats into their already limited profit margin.

Further, I understand the number of USDA plants in the Central New York State area is limited and shrinking with farms having to book appointments up to one year in advance to ensure that their animals make it to slaughter when they're ready.

Please do not regulate the small family farm into bankruptcy. The American consumer is not best served by eliminating the small farm in favor of large corporate processors. I ask that the USDA work with the small family farms throughout the USA to ensure their survival while maintaining the safety of the food supply.

## Rhodes, Suzette

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**From:** K. Biggs [dkddj@yahoo.com]  
**Sent:** Thursday, May 13, 2010 11:01 AM  
**To:** Draft Validation Guide Comments  
**Cc:** K. Biggs  
**Subject:** Preserving our local products

Docket Clerk, FSIS

Room 2-2127  
5601 Sunnyside Avenue  
Beltsville, MD 20705

To whom it may concern:

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

I am an Oklahoma consumer. I appreciate our local farmers and try to support them as much as possible. All of the meat products they sell are processed in locally owned processing plants inspected by the USDA or the Oklahoma Department of Agriculture.

It is my understanding that FSIS is proposing to require that meat processors do a series of expensive tests to validate their HAACP plans. Our local processors indicate that the costs to them would run between \$5,000 and \$50,000/year, depending on the number of their products. This is a prohibitive cost for small locally oriented meat processors, and if this guideline is enacted as a regulation, it will virtually destroy the small processor market. This would put our meat producers out of business, and would destroy my attempts to buy locally.

I am not aware of any problems in food safety caused by local meat processors in Oklahoma. When I read of meat recalls, they aren't coming from small processors, they are coming from giant multi-state processing operations. Laying this new regulatory burden on small meat processors is not called for by the facts on the table. It would cause the destruction of important heritage businesses, that operate in sustainable ways. It would damage the economies of rural areas and destroy jobs in an era when job destruction is already a real problem. It would cause me to lose access to locally grown, locally processed meats.

For all these reasons, I strongly request that the Draft Guidance on HACCP System Validation be revised to clearly state that no in-plant microbial testing is required when an establishment is following the long-standing, safe processes of HACCP.

Sincerely,

Kendra Biggs  
7912 NW 39th St.  
Woodlawn Park, OK 73008

[dkddj@yahoo.com](mailto:dkddj@yahoo.com)

## Rhodes, Suzette

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**From:** Fred Griffen [fredgriffen@frontiernet.net]  
**Sent:** Tuesday, April 13, 2010 10:10 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Comments - Draft Guidance on HACCP System Validation

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

Comments - Draft Guidance on HACCP System Validation

Dear Mr. Almanza:

I am the owner and operator of High Lonesome Farm in the state of New York, and I respectfully submit these comments regarding the Draft Guidance on HACCP System Validation that were publically released on March 19, 2010.

As a farmer who raises certified organic beef cattle and who depends heavily on the meat industry, I am deeply concerned regarding process validation in inspected establishments' HACCP programs. Through communication with our current processor and other concerned meat processors it has become apparent that initiating systems validation in these establishments would considerably affect my business as well. It is my belief that this will cause many of the federal and state inspected processing plants that we rely on to be forced out of business, or pass the increased cost onto me and my customers which could ultimately put me in financial jeopardy as well. The probable loss of income resulting from this could be devastating to my business because our business depends exclusively on very small and small establishments.

Obviously the recent contamination problems in the meat processing industry in our country need to be addressed and corrected along with the rest of the food processing industry. However, it seems to me that most if not all the problems of recent vintage have involved the huge industrial processing complexes, not the small and sometimes very small establishments upon which so many of us direct sellers rely. System Validation should not come in a "one size fits all" document. I believe HACCP System Validation should exempt these small and very small establishments who do a superlative job day after day and year after year. Validation seems completely unnecessary in these establishments while subjecting them to enormous and possibly devastating financial burdens, leading many to simply cease operations or go bankrupt which would then trickle right down to my farm. FSIS regulations currently in place have proven very successful in these small plants. Further requirements in these settings is simply not necessary.

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

Sincerely,

Fred Griffen  
High Lonesome Farm  
2273 Stafford Road  
Cincinnatus, New York 13040

## Rhodes, Suzette

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**From:** Lisa Hammer [hammer.lisa@gmail.com]  
**Sent:** Wednesday, May 26, 2010 8:41 PM  
**To:** Draft Validation Guide Comments  
**Subject:** HACCP complaint, please read.

My family and I want access to locally-raised, pasture-fed, and humanely-slaughtered meats, NOT COMMERCIAL MEATS FROM HUGE CORPORATIONS.

We are NOT alone. There are MILLIONS like us who will take action if our clean food is threatened. We are VERY careful about our food, in fact we travel to small farms to inspect the conditions and animals ourselves.

Help keep these independent farms and slaughterhouses ALIVE and stop trying to force them out of business because industrial meat corporations are lobbying you.

The people of America want locally-raised, pasture-fed, and humanely-slaughtered meats from small, independent farms.

The slaughterhouses that spread ecoli and other pathogens are LARGE INDUSTRIAL CORPORATE slaughterhouses. The small, clean, family run slaughterhouses NEVER get contaminated or spread these diseases. You know this, because you can read the statistics.

One size does not fit all!

The evils of large corporate slaughterhouses should not be suffered by the small, clean slaughterhouses. The little guys are playing by nature's rules. The big guys are not. The big guys are spreading the diseases. The small guys are not.

Large corporate slaughterhouses use methods to process meat that spread millions of pathogens. The small slaughterhouses and farms do not.

Start caring about the welfare of American people. Not the lobbyists and the corporations. That is un-American.

Help us support locally-raised, pasture-fed, and humanely-slaughtered meats. THAT is American.

Enough is enough!

The Wilsons

## Rhodes, Suzette

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**From:** Meira N. Hertzberg [mnh7@cornell.edu]  
**Sent:** Saturday, April 17, 2010 9:55 PM  
**To:** Draft Validation Guide Comments  
**Subject:** don't include small processors in reinterpretation of rules

Small processors don't have the same health and safety concerns of large processors. Therefore, they don't need the same level of oversight. If it is the USDA's intention to put small processors out of business, then this is exactly what the rule re-interpretation will do. The meat from responsible small processors is SAFER than the meat from large processors (and it tastes better). I do not buy any meat from large processors: not poultry, not beef, not fish. So, the USDA is going to put small farmers, small processors out of business in order to make their monitoring jobs easier. This is not acceptable.

Please reconsider this ruling to include small processors in the expensive oversight program that is currently only applicable to large meat processors.

## Rhodes, Suzette

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**From:** Bill [bc1961@sbcglobal.net]  
**Sent:** Friday, May 28, 2010 12:44 AM  
**To:** Draft Validation Guide Comments  
**Subject:** Please consider the points made by the Niche Meat Processor Assistance Network

To Whom It May Concern,

Hello. I read an article in the May 23rd, 2010 San Francisco Chronicle which you can read here:

<http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2010/05/23/MNQ41DEQK8.DTL>

The article says that new proposed regulations could be so costly to small-volume meat processors that cater to animals raised on small farms that it could put those meat processors out of business. I hope these proposed regulations do not do that because if they will do that, I would hope they would be changed so that the meager financial resources of the small processors would be a very important factor in what are the final regulations.

This country needs those small meat processors to not be put out of business - putting them out of business is not in any one's interest.

The article had a link to a website run by the Niche Meat Processor Assistance Network which you can find here:

[http://www.extension.org/pages/NMPAN\\_Comments\\_on\\_FSIS\\_Draft\\_Validation\\_Guidelines](http://www.extension.org/pages/NMPAN_Comments_on_FSIS_Draft_Validation_Guidelines)

I do hope the points raised at that website will be taken into consideration.

For the record, I have no connection in any way with any meat processor (I live in San Francisco) or any other party to this. I just happened to read the article in the Chronicle and it said I had until June 19th to comment so that's what I'm doing.

Thanks and have a great day!

William Crowley  
organization affiliation: none  
home state: California

## Rhodes, Suzette

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**From:** Michal Jasek [JasekM@co.st-louis.mn.us]  
**Sent:** Thursday, April 15, 2010 1:16 PM  
**To:** Draft Validation Guide Comments  
**Subject:** 4.12.2010

4.12.2010

This e-mail is in regards to the Draft Guidance on HACCP System Validation released on march 19. 2010.

My name is Michal Jasek.I am an owner-operator of a custom plant in Floodwood MN.I also work full time as a slaughterhouse crew leader at Northeast regional correction center (a minimum security facility) in Saginaw MN. I have processed meat under HACCP program on and off for seven years.First two years at retail level as a head sausage maker utilizing HACCP program to make shelf stable beef snack sticks.It was quite a new experience going from making sausage without any oversite and documentation to having a meat inspector present while processing and also documenting temperatures and times at different stages of process.

When I was introduced to HACCP I learned some valuable information I was not aware of before.Especially time that takes for pathogens to grow at different temperatures .

In my four years of making sausage at two meat markets ,Without HACCP and under HACCP I had not heard of a single person ever getting sick or dying from our products.

In my current position ,we process pigs under HACCP for about six weeks in the fall.All the pork is than used in our kitchen and also to make a variety of smoked products that are served to our 150 residents.At first it was a challenge to work under HACCP.But eventually I became familiar with all the requirements and worked hand in hand with MDA inspector.We swab 13 carcass for e-coli each year in edition to the meat inspector's 13 swabs.

Since working with HACCP program I have become more aware of food safety involved in slaughter process and further processing and made me more responsible.Last summer we processed chickens under HACCP one day a week for eight weeks for a local farmer who sold them at farmers market in Duluth.We have successfully met HACCP criteria ,but decided not to continue processing chickens under HACCP anymore.Due to the fact of being required under HACCP to test processed birds for salmonella.That decision came after discussing the matter with our meat inspector .Neither one of us thought we could pass all the tests.And if that is the case we would not be able to make the necessary changes in our process.

Process that produces birds that have been sold at farmers market for many years before HACCP was required for this farmer's chickens. Now with HACCP the sale of locally raised livestock at local farmers market is totally eliminated.To my knowledge I have not heard of a single person getting sick or dying from consuming chickens processed in this facility.The closest poultry processing facility is two hours away.

There were many facilities and stores that quit processing when HACCP came into effect.Most of them small and very small business.I understand ,there is a big push for safe food and that is a good thing,but ultimately the consumers have to behave responsibly as well as processors.

After reviewing the proposed testing policy I must ask ,will this do more bad than good.Especially to small processors. Variety of processing is what lets most of these businesses stay afloat.

If this new policy comes in effect most small businesses will not be able to afford to pay for all these tests.

The result will be in shrinking of product variety,letting employees go,dropping inspection or shutting business down completely.

This is the biggining of the end of small meat processors in this country.

So I urge you do not make any changes to current HACCP.

Sincerely  
Michal Jasek-butcher

May 17, 2010

Docket Clerk -

With regard to proposed HACCP validation guidance regulation:

The whole premiss of a HACCP plan is that if you examine a process and determine the critical control points, then determine limits for the critical control points, and strictly adhere to the limits of those critical control points a safe product will be made. To suggest as you have in your March 19, 2009 letter that prerequisite programs and other controls that are not identified as critical control points be validated is contra to the HACCP food safety principle. With a kill step such as cook temperature as the critical control point why is it necessary to validate prerequisite programs that are only meant to provide a starting point but have little impact on food safety as long as the critical control points are followed?

There is a huge difference between the message delivered in your March 19, 2010 letter and the "*FSIS Fact Sheet: Validation*". The March 19, 2010 letter describes a great deal of in plant testing is necessary. The *Fact Sheet* says microbial testing may not be necessary. I will expect that the USDA's reinterpretation of validation does not require excessive microbial testing.

Hopefully, we can agree that all establishments have scientific technical support documents that satisfy the first part of validation or else an establishment could not have developed critical control points. As the *Fact Sheet* is written I do not believe anything is missing at my establishment. However, the March 19, 2010 letter describes a tremendous amount of regulatory creep. The regulatory nature of the Mega-Reg continues to suffocate my business. Just another cost to my business with no benefit. I am responsible for the safety of the food I produce and take steps to see that happens every day. I do it for moral and economic reasons. I follow the regulatory requirements of the USDA because I am required to do so in order to stay in business. In these difficult times when I am doing my best to keep people employed one more cost would be damaging to my business.

Joe Maas

JTM Food Group

VP of Manufacturing & Production

513-367-3516

## Rhodes, Suzette

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**From:** Dawn Bries [dbries@gmail.com]  
**Sent:** Wednesday, April 14, 2010 5:32 PM  
**To:** Draft Validation Guide Comments  
**Subject:** In-plant validation testing

To whom it may concern,

Hello, I'm Jayme Bries, owner of Wholesale Meats and Processing, Inc. in Dyersville, Iowa. We have been a family owned business since 1974 and have been at our current location since 1980. In October of 2009 my wife and I purchased the business from my parents. We currently have ten employees.

This letter is in regards to the FSIS consideration of mandating validation of all HACCP plans. I understand the concern for food safety, however we have for years been ahead of our time when it comes to sanitation in our plant. We completed our FSA last November and our auditor was Mr. Dick Benda, he told me that our beef and hog carcasses were some of the cleanest he has ever seen in all of his years and that our records were second to none. We currently test for L. Mono, Generic E. coli and E. coli 0157:H7 in addition to the state's testing of Salmonella, L. Mono and E. coli 0157:H7 and have never had a positive test.

My concern is about the in-plant validation or our HACCP program. We are considered a small to very small plant which is said to produce 1,000lbs of official product daily. If you figure this at 5 days per week and 52 weeks per year that is around 260,000lbs/year. Last year we produced around 50,000lbs in official product total. According to the mandate, we would have to validate 9 plans at an estimated cost of around \$12,000 in initial cost. The cost doesn't justify the production, but we need all the production we can get to keep our employees busy and employed. Also I don't feel that we can raise our prices to accomodate for this testing, because in these economic times the customer can't take on much more of the cost.

I ask that you please reconsider this proposal in order to save a lot of small locker plants from going out of business and even more people being on the unemployment line.

Thank you,  
Jayme J. Bries

## Rhodes, Suzette

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**From:** singfasola@yahoo.com  
**Sent:** Thursday, May 27, 2010 7:49 AM  
**To:** Draft Validation Guide Comments  
**Subject:** Message from Internet User - Draft document on HACCP validation

I live in central Vermont, in a part of the state that still supports a number of small farms. The infamous large slaughterhouse in Grand Isle had uncorrected humane and biological violations, and was closed for good reason. But small slaughterhouses would be the choice for many small-herd livestock farmers. In Vermont, the need for small slaughterhouses goes unfilled most have closed because of the cost burden of existing regulations.

Regulations and procedures are necessary, but they should be appropriately scaled. In my opinion, regulations are overbearing because federal inspection is inadequate. Inspection is expensive, but procedures alone do not guarantee compliance. HACCP outcomes would be better accomplished with a more frequent and robust inspection system.

More and more Vermonters want to buy locally produced food, including meat. Our local farmers recognize that assuring meat quality includes safe and humane slaughter and processing practices. Requiring small slaughterhouses to conform to monitoring regulations suited to the scale of much larger operations threatens the food supply for Vermonters as well as the livelihood of the farmers.

Vr,  
Elizabeth Templeton  
Brookfield, VT

## Rhodes, Suzette

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**From:** Sherrie Hastings [iv4planting@hotmail.com]  
**Sent:** Monday, April 19, 2010 10:02 AM  
**To:** Draft Validation Guide Comments  
**Subject:** Comments - Draft Guidance on HACCP System Validation

As a consumer of organic meat, processed by a small meat plant, I am very concerned about the potential effects of this HACCP System Validation, both to small processors, their suppliers and the consumer. Implementation of required in-plant microbial testing appears to be another extreme response by regulatory agencies to resolve problems that have occurred primarily in large scale processing facilities.

This will result in a *h u g e* financial burden to small scale meat processors as well as farmers who are raising the livestock! It will directly affect the consumer as well, first with an increase in meat prices by processors who must raise their prices to offset the monumental testing costs, then with decreasing availability of meat products as these smaller processors find the additional financial burden too much to bear and end up closing their operations. The cost of meat products processed at the larger facilities will also increase, and would very likely affect the number and types of products that are available to the consumer, since they too will have to offset costs.

Those who consume organic meat from the small scale processors will be hit hardest by increased prices, with the conventional market close behind. We consumers simply will not be able to afford the higher prices, will be forced to decrease meat consumption overall. Without the demand, production will ultimately decrease, possibly disappear.

PLEASE revise the Draft Guidance on HACCP System Validation to eliminate the requirement for inplant microbial testing.

Thank you.

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The New Busy is not the too busy. Combine all your e-mail accounts with Hotmail. [Get busy.](#)

## Rhodes, Suzette

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**From:** Diane Gage [dgage@san.rr.com]  
**Sent:** Friday, May 14, 2010 10:34 PM  
**To:** Draft Validation Guide Comments  
**Subject:** proposed food processing regulations

Dear USDA

Here is a copy of a letter I sent to Senator Dianne Feinstein regarding provisions in the Farm Bill working its way through the U.S. Congress. Since I mention a local concern (Southern California) to do with the availability of local meat and meat products from small operations attentive to sustainability and ecological issues, I'm sending a copy to you. Please don't grind small and mid-size operations out of business in a rush to regulate the industrial-strength operations that have substantially different problems and solutions.

Thank you for your attention and here is my letter:

Dear Senator Feinstein:

Thank you so much for responding to my concerns about small farmers being unnecessarily burdened by measures meant to protect the food supply from problems caused mostly by large farming operations. I appreciate the careful concern you are bringing to this issue as well as your taking the time to reply to me. It is especially meaningful to me that you are attending to one small voice in a debate I'm sure is dominated by much louder, well-funded voices with mega-dollar stakes in the outcome. What I care about is access to local, organic/sustainably-grown food from small to medium-sized farm operations well integrated into my community and environment. A situation I wish for everyone.

While I am not an expert and don't know exactly what the best solution might be, I do know that it's been difficult to find local (San Diego) suppliers of certain kinds of sustainably raised foods - especially meats and meat products. My understanding is that this is at least partly due to past laws and regulations put in place to monitor large operations guilty of past abuses, which perhaps inadvertently but nevertheless effectively imposed conditions nearly impossible for smaller farmers to meet.

Here is a link to an essay I read today about precisely this issue:  
<http://www.chewswise.com/chews/2010/05/notes-from-a-slaughterhouse-proposed-usda-rules-could-crimp-local-meat.html>

At this point I would be inclined to favor Tester's amendment over Stabenow's because I can imagine the burden applying for grants and attending training courses might well impose on a small farm with neither people nor time to spare. Small farms tend to be all-hands-on-deck sorts of operations. Maybe if there was a way to test or inspect out of the necessity for such training? What if someone is already engaged in healthy and safe farming practices? Why would they need training to do something they're already doing?

I trust you'll be doing the best you can with this as the issue makes its way through the system. I don't envy you your job, Senator Feinstein, but I'm certainly grateful that you're there doing it. I feel very well represented by you and wish you all the best with the challenges you face on my (and our) behalf.

Sincerely,  
Diane Gage

PS - In case you hear arguments that people like me represent the wealthy few who can afford the luxury of local, organic/sustainably-grown food, I'd like you to know it can be cheaper this way, too. I belong to a CSA farm that supplies me with all the fresh, organic fruits and vegetables I can eat for \$12.50 a week. High nutrition, great flavor, small carbon footprint, good for the soil/water/air - such a bargain!