

## White, Ralene

---

**From:** Racine Kringle [racine.d.kringle@gmail.com]  
**Sent:** Wednesday, May 26, 2010 6:30 AM  
**To:** Draft Validation Guide Comments  
**Subject:** Small scale meat processing

Hello!,

My name is Elizabeth Craig - I live in Indiana. I currently purchase my meat in a few different ways:

1. I purchase from farms that have had their grass-fed beef/pastured poultry processed by a small to medium size processing facility. I am fortunate that I get to look the farmers in the eye and shake their hand and thank them when I buy meat from him.
2. I purchase from a local butcher - he not only takes in meat that's been inspected, etc by you but he also has a separate facility for processing game that hunters bring in. On special holidays, he'll cut us special cuts of meat - and since my husband and I are adventurous, we always ask him for an 'interesting' cut and have not yet been disappointed by his creativity! => We're just starting to purchase from another processor too, and their meat has been tasty and they're very helpful!

These are the situations I purchase our meats under, and for us, this isn't likely to change - but only increase while we build further relationships with local farmers and small processors.

The farms we purchase from tell me that processing can be expensive, and I'm worried that with the new proposals the price will go up or that some of the smaller processors (who have not had any problems with sanitation and have not been fined or had an issue with food safety) will go out of business if they are unable to meet the costs of the new inspections.

I'm sending this Email in the hope that one small voice here in the Midwest can help add to the other small voices all over the USA in joining together to let you know how much we value our farmers and our small meat processors. Please keep them - and my husband and I! - in mind as you propose new guidelines/regulations.

Thank you! =>

Elizabeth Craig

## White, Ralene

---

**From:** katew.justfood@gmail.com on behalf of Kate Wall [grocerymgr@justfood.coop]  
**Sent:** Tuesday, May 04, 2010 11:03 AM  
**To:** Draft Validation Guide Comments  
**Subject:** HACCP

### **To those those chosen to represent me,**

I am a citizen who wears many different hats when it comes to local food. I am responding to the proposed "verification processes" of HACCP regulations.

I have been trained on these very requirements and while I value them the process of verification seems an unfair burden, at this economic crossroads it seems especially important to fully consider the ramifications on small businesses. USDA Deputy Secretary Kathleen Merrigan has said that she doesn't think added costs from these FSIS regulations will be burdensome to small processors and/or farmers. But does she know for sure? Has an economic impact analysis been conducted for these FSIS regulations? Shouldn't we do that first before proceeding?

I would also ask that this process slow down. Many small farmers who rely on local processors probably don't even know about this proposal, and as the growing season kicks into gear now is NOT the time to expect them to be aware of this political debate. Since it will affect them dramatically, small meat producers need to be solicited for comment.

I would also like to state that there need to be more EXEMPTIONS for the smallest producers. The BEST way to create a safer food system is to protect and propagate small- and medium-sized processors, not to make them less profitable. After all, a decentralized food system is an insurance system against big outbreaks. Small processors can't produce enough meat to necessitate a 20 million-pound national recall of hamburger, so we should strengthen our small, local food systems, not undermine them.

Thank you for listening to and advocating my views,

--

Kate Wall  
Grocery Manager

Just Food Coop  
516 S Water St.  
Northfield, MN 55057  
(507) 650 0106

**White, Ralene**

---

**From:** Frank Kloucek [fkloucek@hotmail.com]  
**Sent:** Tuesday, June 08, 2010 9:13 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Attention Alfred Amanza Docket Clerk re: Comments from Senator Kloucek

**June 7<sup>th</sup> 2010**  
**Docket Clerk FSIS**  
**Alfred Almanza**  
**Room 2-2127**  
**5601 Sunnyside Ave.**  
**Beltsville, Maryland 20705**  
**RE: Draft Guidance on HACCP Systems Validation**

**Dear Mr. Almanza:**

**I am a state senator from South Dakota and strong supporter of our small in- state meat processors. The South Dakota Meat Processors Association has approximately 100 members state wide. These processors have done an excellent job in keeping our food supply safe for many years.**

**I agree with the processors that the rule being proposed by USDA FSIS on HACCP Systems Validation does not implement measures that will result in safer food. I strongly support the current system of validation and oppose the proposed rule. Validation should focus on procedures and methods used in each plant. The mandate for more microbial testing will increase costs without necessarily increasing food safety.**

**It is my belief that FSIS and the meat processors should strive to do what is in the best interest of the food consumer as both groups ultimate goal. I believe the consumer will be hurt by these proposed rules because of higher food costs and fewer choices of business to purchase product from. Increasing microbial testing without precise evidence that a problem exists will drive up costs and not increase food safety. Please keep the current system of validation interpretation. It has worked well since the beginning of the HAACP program thirteen years ago.**

**This proposed rule will be cost prohibitive especially to many small processors with no guarantee of increasing food safety. We instead should be looking at ways to expanding our small processors base in this great nation. I believe it would be counter productive to run them out of business with no guarantee of increasing food safety by adopting this new rule.**

**In conclusion I strongly oppose the proposed HACCP Systems Validation Rule. The additional mandated testing requirements will be extremely costly and do not make the food safer. If a new rule is needed it should be developed with the input and support of the small processors to ensure the continuation of cost effective, safe food for our consumers.**

**Respectfully Yours**

**Senator Frank Kloucek**  
**29966 423<sup>rd</sup> ave.**  
**Scotland South Dakota 57059**

## White, Ralene

---

**From:** Dean and Colleen DeWitt [china\_oaks@yahoo.com]  
**Sent:** Wednesday, June 09, 2010 5:22 AM  
**To:** Draft Validation Guide Comments  
**Subject:** Commentary.....

I'd like to comment on the proposed USDA regulations for small slaughter facilities.

First, I'd like to qualify my input by stating that my experience in food preparation with an Associate degree in Culinary Arts, my education in nursing, interest in community health and experience as a RN, fifteen years as a licensed arborist, some experience in commercial chicken processing, milking on dairy farms and my personal efforts gardening and raising livestock which I have butchered at home should give my thoughts some credibility.

My years as an arborist gave me opportunities to work privately while I was trying to raise my family through chronic financial concerns. I attempted to do the right thing and looked into obtaining personal insurance for tree work. To cover the thousands of dollars of expense for insurance doing little fifty dollar take-downs should have taken away any financial incentive to work. But it didn't, and I worked some, here and there, without insurance. I point this out because even the small, maybe reasonable, regulation of insurance coverage to be an arborist was too much of a difficulty for me to meet but I REALLY needed the income.

I don't believe it in the best interest of the public to inhibit local agriculture. Regulation will inhibit local agriculture, wherever it is directed, even under the best intentions. I seriously believe we need to encourage and develop more local food sources as a matter of public health, and for national security. Common sense is too underrated. If regulation was so simple as to require small processors to display and inform patrons that their facility is unlicensed, not inspected, and may not meet USDA standards, that should be enough I think. To insure that small local facilities are just that, maybe it could be limited to processors of <25 birds a week, one cow a bi-monthly, one pig a week, or a simple financial basis of less than some amount a year. You could also prohibit shipping for such businesses, requiring that customers pick up their products, so as to ensure that they could see and evaluate the facilities and producers personally.

For our health and future, we need to encourage and support local agriculture. Giving any more advantage to larger scale, corporate agribusiness is not a wise or healthy road to take; they are the ones needing more regulatory oversight, not our small-scale local farmers and neighbors that we trust.

Thank you. Please vote with preference to local producers, not for more regulation that will deter local agriculture.

Yours sincerely,

Dean DeWitt, RN, milker, and blueberry raker.

"Freedom's just another word for nothing left to lose."

---- Kris Kristofferson

## White, Ralene

---

**From:** Ken & Sue Griebel [ksgriebel@newulmtel.net]  
**Sent:** Thursday, April 29, 2010 1:52 PM  
**To:** Draft Validation Guide Comments  
**Subject:** new meat testing regulations for small food processors

Hi,  
My name is Susan Griebel and I live near New Ulm, which is in Brown County, MN.

As a livestock producer who depends on the meat industry, I am concerned about the draft validation compliance guide because:

- a) There is no clear and supportable case for the existence of a food safety problem that this testing would resolve! The majority of food borne illness in meat products come from huge corporate meatpacking plants. "If it ain't broke, don't fix it."
- b) The guidelines run absolutely counter to the Know Your Farmer, Know Your Food Campaign that the USDA is promoting, which I support.
- c) The new meat testing regulations will be costly and time consuming for small meat processors, which could possibly put them out of business. These small and midsize processors are key partners in making local and regional food systems work. Also, especially during these economic times, the United States needs every business to be successful!
- d) I believe these new meat testing regulations for small food processors will waste money, time and precious resources (i.e. the well-being of small business owners) In other words, it will increase their psychological, emotional and physical stress.

Please do not implement these meat testing regulations for small food processors. Thank you for your time.

Sincerely,  
Susan E. Griebel

## White, Ralene

---

**From:** wrhenning@gmail.com on behalf of WILLIAM R HENNING [wrh6@psu.edu]  
**Sent:** Thursday, April 29, 2010 10:13 AM  
**To:** Draft Validation Guide Comments  
**Subject:** validation proposal comments.

Dear Sir:

It seems that this proposal FSIS does little to improve food safety. The proposed Validation is not Validation as it is defined by your agency... It is verification. To complete a true validation study you must do a challenge study with the organisms you are trying to validate the process for. For example, we we tried to validate dry sausage processes, FSIS forced us to inoculate with a 5 strain cocktail of the E coli that were implicated in an acutal outbreak. I have been teaching HACCP for 13 years and it does not meet the definition of Validation.

I have worked with dozens of small and very small plants to help find and provide scientific validation of their processes. While not perfect, scientific challenge studies are the only effective method of validation; trying to show that indicator organisms validate the process to control pathogens does not work. We have plenty of data to show that there is a very weak correlation between indicator organisms and pathogens, just as scientists in your agency has argues.

When you add the tremendous cost to these small plants, this will be a death blow to many processors. There is little scientific evidence to support such expenditures. If there is a problem with validated processes, no one from your agency has ever communicated this, even though many groups have asked for this. WE have been told it was the cause of some recalls, but we are still waiting for come clarification as to which these were.

I have had several plants tell me they would drop inspection and go strictly Custom and Retail Exempt. How does this make the meat safer???

I hope the agency will reconsider such a wide sweeping proposal and focus on the problem, if one actually exists, in process validation. I know there are a couple of marginal specialty products, but these do not warrant imposing such costs on the rest of the industry at any time, but especially when the economy is so weak.

Please look at the science and do not implement this proposed regulation.

Sincerely,

William R. Henning, Ph.D.  
Industry Consultant  
Emeritus Professor, Penn State

**Rhodes, Suzette**

---

**From:** Heidi Sprunger [manleymeatsinc@centurylink.net]  
**Sent:** Monday, April 12, 2010 12:40 PM  
**To:** Draft Validation Guide Comments  
**Subject:** HACCP Validation Guidance Release

I am writing in regards to the HACCP Validation Guidance Release. Many plants such as ours has several HACCP programs that we participate in. The breakdown of what this may potentially cost us is ridiculous. You have already cut the state inspection and the state funding for state inspected plants, what on earth would be the purpose of charging these additional charges. I understand that you want to make sure that state plants are producing a safe product, but the costs that come along with producing the product really should be re-evaluted. Hopefully you will received several comments and other suggestions that you will take the time to look over what you are to trying to get passed.  
Thank you for your consideration.

**Rhodes, Suzette**

---

**From:** Nancy Morrow [NMorrow@kaplan.edu]  
**Sent:** Tuesday, April 13, 2010 12:10 AM  
**To:** Draft Validation Guide Comments  
**Subject:** Validation comment

Please do not burden small meat processors with new end testing requirements. It is not the small processing plants that are having problems. Any new requirements must have provisions for saving small processors from a undue financial burden.

Sincerely,  
Nancy Morrow  
[Tomorrows5@comcast.net](mailto:Tomorrows5@comcast.net)  
253-588-5324

**Rhodes, Suzette**

---

**From:** Dianne Merkel [diannemerkel@hotmail.com]  
**Sent:** Tuesday, April 13, 2010 2:05 PM  
**To:** Draft Validation Guide Comments

Hello,

I am commenting on FSIS. I am concerned that FSIS will put a lot of small independent meat processors out of business by the excessive cost. We will be left with only a few big meat processors who can then have control of our food source. This is scary to me!

Dianne Merkel

**Rhodes, Suzette**

---

**From:** mostlysonny [knin4ever@gmail.com]  
**Sent:** Tuesday, April 13, 2010 6:37 PM  
**To:** Draft Validation Guide Comments  
**Subject:** About New Validation Guidance

Dear Friends;

As a new business, we @ "Hobart's Old Stove" are very concerned about raising costs of any kind. As we understand, new way of collecting microbial data, performed by our meat suppliers will cost them much more than before, which means that we as a business will end up paying those differences. And again, as a new and very vulnerable, we might be unable to survive this. So, please, consider us and many more other business, which may suffer because of this.

Thank You!

## Rhodes, Suzette

---

**From:** Harlan Martzahn [turkey@dishmail.net]  
**Sent:** Tuesday, April 13, 2010 10:47 PM  
**To:** Draft Validation Guide Comments  
**Subject:** HACCP Validation

If you decide to go with this program you will force us and all other small plants out of business. We are a very small plant and no way we can afford to go with this. Do you want businesses or do you want unemployment? If we have to quite processing it will force not only us but our inspectors our customers and our employees a great hardship.

**Rhodes, Suzette**

---

**From:** Sara Shapleigh [sarashapleigh@gmail.com]  
**Sent:** Saturday, April 17, 2010 6:23 PM  
**To:** Draft Validation Guide Comments  
**Subject:** I support Local Farms

Dear Sir/Madam,

I support local farms and depend on them to deliver fresh natural produce, dairy, and meats. If the small processing plants were closed, the local farmers in my area would not be able to process their meats locally and the cost would dramatically increase. Closing the processing plants would incur extra costs to the producer and eventually the consumer. On my grad school student budget, I can not afford such price hikes. Please do not do those who are trying to eat healthy and support local farms a disservice by closing the processing plants.

Sara Shapleigh

**Rhodes, Suzette**

---

**From:** Jason Yonover [jmy37@cornell.edu]  
**Sent:** Saturday, April 17, 2010 7:05 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Local Farming

To whom it may concern:

I have recently heard about prospective changes in the USDA meat inspection policies and I--along with countless others--am extremely concerned. This change will immensely damage the local economy for farmers in Ithaca (my city of residence) and, I am sure, many other locations.

I urge that this proposal be entirely reconsidered with small farmers in mind and I stress that the local food market is already restricted more than enough by the USDA.

Sincerely,  
Jason Yonover

## **Rhodes, Suzette**

---

**From:** Persephone Doliner [pdoliner@twcny.rr.com]  
**Sent:** Sunday, April 18, 2010 12:34 PM  
**To:** Draft Validation Guide Comments  
**Subject:** small meat processors are vital

**To whom it may concern:**

My family and I very highly value our local livestock farms. We believe that localized food sources are vital for a food-secure future, for the upstate economy, and for our health. Small USDA-certified meat processors are needed, and they are doing a good job. Historically, health threats owing to disease organisms happen in large enterprises--huge meat farms, big slaughterhouses--not in small, hands-on, well-run businesses. Please do not drive these small processors out of business with new layers of regulation. Please instead make preserving these vital enterprises a keystone of your policy.

Sincerely, Persephone Doliner, Ithaca, NY

## Rhodes, Suzette

---

**From:** jhw@premieronline.net on behalf of jhw@mtcnet.net  
**Sent:** Wednesday, May 12, 2010 9:02 AM  
**To:** Draft Validation Guide Comments  
**Subject:** new usda rules meat testing

We are deeply concerned about new testing regulations proposed by FSIS and how they will impact small meat processors.

Small firms are careful, and the facility we use for our meat is creating jobs and growing the local economy! Please ensure continued growth for our area by not imposing new testing or safety rules on small firms.

The owner of our processor is very concerned about the overhead costs additional testing will bring to his business. We need him to be profitable for local meat producers to have a way to package meat products for niche markets.

John Wesselius  
Sioux Center, Iowa

## Rhodes, Suzette

---

**From:** Jeremy Braddock [braddock@cornell.edu]  
**Sent:** Monday, May 24, 2010 2:32 PM  
**To:** Draft Validation Guide Comments  
**Subject:** slaughterhouse regulation

To whom it may concern,

I applaud the USDA's interest in curtailing and preventing tainted meat from circulating in the U.S. However, I am very concerned about the effect of proposed legislation upon small local farms. One of these, "The Piggery" near Ithaca New York has been a wonderful new addition to our community. My family buys meat from this farm far more than we would do even from our reputable local grocery stores. I hope that whatever legislation is passed will protect and encourage farms like the Piggery.

Sincerely  
Jeremy Braddock