

Riley, Mary

From: Dakota Harvest Lamb [info@dakotaharvestfarm.com]
Sent: Monday, May 03, 2010 8:41 AM
To: Draft Validation Guide Comments
Subject: FSIS regulation comments

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 want safe food also, but it is not the small processors that are the problem. They do an excellent job of providing a safe product.

I am a small lamb producer and sell all my lamb directly to the customer. The proposed regulations will force my processor to close, which puts me out of business. The next USDA lamb processor near me is 225 miles away, that is if he is able to stay in business if the new regulations go into affect.

Thank you for your time

Bob Corio
Dakota Harvest Farm
Jefferson, SD 57038

5/3/2010

Riley, Mary

From: Curtis Charles [charlesfamilyfarm@msn.com]

Sent: Sunday, May 02, 2010 2:08 PM

To: Draft Validation Guide Comments

Subject: Draft Guidance on HACCP System Validation

Dear Mr. Almanza:

Curtis Charles respectfully submits these comments regarding the Draft Guidance on HACCP System Validation that were publicly released on March 19, 2010.

As a livestock farmer who depends on my local "freezer beef" business, that I am currently trying to establish and grow, our concern regarding process validation in inspected establishments HACCP programs have prompted me to comment concern. Through communication with the several local butcher shops that we use for their service, it has become apparent that initiating systems validation in these shops would considerably affect our business as well. It is my belief that this will cause many of the the federal and state inspected butcher shops that we totally rely on, to be forced out of business or pass huge increases in cost onto us, and ultimately putting my little start up business in severe jeopardy. The loss of income resulting from us catering to this niche market will be devastating to the Charles Family Farm because our business depends on a very small customer base and small shops to provide the butchering service. I can not see how we will survive or the shops we use will survive under proposed validation plan.

Curtis Charles and the Charles Family appreciates the chance to comment on the Draft Guidance on HACCP System Validation. Thank you for your time and consideration.

Sincerely,

Curtis Charles
owner, Charles Family Farm
www.charlesfamilyfarm.com

Riley, Mary

From: Joe and Bonnie [jobon@hmtel.com]
Sent: Saturday, May 01, 2010 10:24 AM
To: Draft Validation Guide Comments
Subject: Comment re New Draft Guidance Rules for meat processors

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

FROM: Mr. and Mrs. R. J. Austin
21975 - 183rd Avenue
Wykoff, MN 55990

Dear Sirs,

We are small farmers in SE MN. We have struggled many years to make farming a positive income. We have, for the past 23 years retailed our livestock directly from our farm to stores and individuals. We use a small USDA locker to prepare the meat for our customers. They do a wonderful job. Our two businesses have added to the local economies by providing jobs, purchasing services and supplies from other small businesses. This also keeps schools and community services staffed and funded.

We are concerned about the draft validation guide compliance guide because it will adversely affect small meat processors. The new validation rules would raise costs for all involved. These changes will be a negative impact on those processors, farmers, and end consumers.

Mr. and Mrs. R. J. Austin

Riley, Mary

From: andrea.geary@uni.edu
Sent: Friday, April 30, 2010 11:32 PM
To: Draft Validation Guide Comments
Subject: small meat processors

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, and could ultimately contribute to further decline of small (independently or family owned) meat production in the U.S.

The state of Iowa alone has seen dramatic decline of small meat processors and meat processing facilities due to over-regulation and the associated high costs with complying with said regulations. While I respect the need for food safety, it seems as if this draft will not significantly contribute to substantial gains regarding the safety of food and will only serve to tie the hands of those trying to build healthier food systems, as encouraged by 'Know Your Farmer, Know Your Food' and other groundbreaking USDA initiatives. I would encourage you to please consult with small meat processors in an open way as to how to better increase food safety concerns while not putting them out of business.

Thank you for your time,

Andrea Geary
Northern Iowa Food & Farm Partnership
UNI-CEEE
Cedar Falls, IA 50614
(319)273-7883
www.niffp.org

Rhodes, Suzette

From: Will Walker [willwalker@gmail.com]
Sent: Saturday, April 17, 2010 12:19 PM
To: Draft Validation Guide Comments
Cc: Katherine Kieckhafer
Subject: small meat producers need seperate guidelines

I buy most of my meat from small, local producers. I think regulatory action that requires them to follow the expensive procedures designed for huge industrial producers is bad for their business and counterproductive to the public health. The small producers I buy from can't afford to set up a multimillion dollar USDA compliance system, and they shouldn't have to. Industrial producers need such systems to manage the major safety risks (low labor intensity, massive throughput and possibility for contamination) that come with their emphasis on achieving economies of scale. Small producers avoid these safety risks altogether by applying extensive PERSONAL supervision to a small number of animals, safeguarding the public health and their own reputations. The small producers I buy from are passionate about providing quality meat to their customers, the majority of whom they know by name, and they take the time to keep their meat safe. I feel much safer buying meat from them than I do buying from the industrial producers, who announce million-pound hamburger recalls with regularity.

For the USDA to bankrupt the small business owners that produce this safe, high-quality alternative to the contamination-ridden industrial meat system, by enforcing onerous and inappropriate industrial regulations in the name of "consumer safety" would be ironic to say the least. The regulatory guidelines for industrial producers are inappropriate for small producers. The USDA should set up separate guidelines for small producers that safeguard and promote the unique consumer benefits of the small producer system.

Sincerely,

Will Walker

Rhodes, Suzette

From: Anita G [anitag99@yahoo.com]
Sent: Saturday, April 17, 2010 11:14 AM
To: Draft Validation Guide Comments
Subject: Disagree with USDA changes to small butchers/slaughterhouses

I disagree with the proposed changes to the USDA regulations. I live in upstate NY and we have some wonderful small local farms that are producing local meat -- which is safer, better tasting, and better for the environment than the large 'factory-farmed' meats you typically get in the US.

The proposed changes to USDA regulations will force these farms out of business in my opinion. I do not support it.

As a US citizen, a lover of safe, fresh local food, and someone concerned about both the environment and the alarming obesity rates in this country,

Please do not make changes that remove the option of local meats!

Thanks,

Anita Christiansen

Rhodes, Suzette

From: Eric Woods [woodseowl@gmail.com]
Sent: Saturday, April 17, 2010 11:04 AM
To: Draft Validation Guide Comments
Subject: Concerns regarding USDA testing reinterpretation

I have learned of the regulation reinterpretation regarding USDA tested meat and was informed via the Cornell Cooperative Extension of the impact that this will have on small operations. In short, I understand that there is a substantial additional financial burden to get set up under the reinterpreted regulations.

My concern is for the health of our farms, our communities, and our environment. Local, small operations are inherently less concentrated than large factory farms and thus less prone to major health issues that come from either close quarters of large numbers of animals and meat or wide distribution of tainted meat. To further reduce the number of small operations puts more apparent control in the hands of inspectors, but it also increases risk of large scale health issues through concentrating activities to fewer locations with higher throughput and larger impact when failures do occur.

To force small operations out of business is inherently against the health-based mission of the USDA. Please do not allow regulations to be shaped and interpreted such that this happens.

Thank you.

Eric Woods
Ithaca, NY

Rhodes, Suzette

From: Sonja Carlborg [scarlborg@earthlink.net]
Sent: Sunday, April 11, 2010 7:29 PM
To: Draft Validation Guide Comments
Subject: Comments

Hello, I am a strong supporter and consumer of locally grown food and livestock, humanely treated. In order to support my local economy, I buy all of my meat at Two Fat Butchers, a butcher shop here in Front Royal, and at our local meat processing plant, Blue Ridge Meats of Front Royal. You can find Blue Ridge Meats featured in the recent Washington Post article *Local Slaughterhouses Come Back to Life* (<http://www.washingtonpost.com/wp-dyn/content/article/2010/03/16/AR2010031600921.html>). I think local food supply is the best way assure food security in this country as well as ensure local jobs, less pollution from industrial-scale agriculture and husbandry, and support for sustainably raised livestock. From what I understand, it seems like your proposed new validation rules are simply a way to harass small producers, who already have a functioning HACCP Plan (zero E. Coli positives ever, which is far better than the larger processors can claim). The \$3000 testing fee seems outrageous, and would likely put these small new businesses promptly out of business. The revival of small food producers and processors has been a small but glowing light of entrepreneurial hope in this bleak recession...and is, I believe, the way of the future. Please reconsider this onerous and unnecessary step. Focus your energies instead on putting CAFOs out of business for good. Thank you.

Sonja Carlborg
210 W 1st St
Front Royal, VA 22630
540-636-4344

Rhodes, Suzette

From: Kathie Emmett [stwpackingco@yahoo.com]
Sent: Sunday, April 11, 2010 4:18 PM
To: Draft Validation Guide Comments; aamp@aamp.com
Subject: comments

This is a prime example of the absurdity of FSIS and their expectancies.

The problem is that even if they don't adopt a rule or publicize a change, through an FSA, NR'S will be written based on 9CFR 417.9(A0. They will relate it to verification activities that they will say are non compliant. This is exactly what they will did to my plant in a recent FSA. The NR stated that my plant was non compliant because the AAOC approved lab I used did not test the full amount of the product sent. No rules just a way to circumvent the system. This N.R. is still in the appeal process. My message is that even if they don't have a rule they will start issuing N,R.'s as a group we really need to stop this in the bud. Appendix A & B have always been safe harbor since it is their published rules and food safety system. Many of us will have to change our businesses or close as a result. Even testing is not a rule, but they coerce us into doing it for the sake of validation and verification. The rules they do have can be twisted and turned by inspectors and EIO people doing an FSA to fit their own agency and for what purpose except to terrorize an already over regulated industry.

signed
Dewey Emmett
Stillwater Packing Co.
42 Hersrud Rd
Columbus Mt, 59019

Rhodes, Suzette

From: Angela [angela@angelinaskitchen.com]
Sent: Saturday, April 03, 2010 5:39 PM
To: Draft Validation Guide Comments
Cc: 'AK'
Subject: Negative Impact of HACCP Systems Validation

Dear Mr. Almanza,

Thank you for inviting our comments on the HACCP System Validation.

My wife and I own a small business in Woodbury, Minnesota that is currently under the state equivalent inspection program. As consumers, and business owners, we believe that food safety is critically important, but we also believe that excessive regulation can have significant unintended consequences. In our case, we believe that the likely increase in costs associated with the testing requirements for the validation would be excessive, and in fact, would result in us having to close our business. We currently provide employment to 10 individuals, and our growth plan would likely double that in the next year.

We are all aware current high unemployment rate in our country. The Secretary of the Treasury, Tim Geithner, stated this week that it will take a considerable amount of time for unemployment to decrease, and the CBO has projected that the recently passed health care reform bill will cost even more jobs. In light of the high unemployment rate we are facing, and excessive costs of HACCP System Validation, we believe that it is worthwhile to reevaluate these changes to see if there are other ways of accomplishing the same goals without causing additional job losses.

Thank you for considering our comments,

Paul and Angela Verrastro

Angela Verrastro
Angelina's Kitchen
2170H Eagle Creek Lane
Woodbury, MN 55129
www.angelinaskitchen.com
[Follow Angelina's Kitchen on Facebook](#)

Rhodes, Suzette

From: Janice Fisher [jejdfisher@yahoo.com]
Sent: Friday, April 02, 2010 7:14 PM
To: Draft Validation Guide Comments
Subject: HACCP validation

Mr. Almanza,

Please consider small plants when making your final decision. I see no way my plant could survive these costs. This plan would absolutely put me out of business. We have been in business since 1945 and presently employ 45 people, with only a few of these part time. The estimated cost of this is greater than my company's income.

Small plants provide many services to their community and those services would be a great loss to those communities.

We all want safe food. Most small plants could not survive if an unsafe product would come out of their plant. For that reason alone, we are extremely careful to make sure only the best comes out of our plants.

If you pass this on small plants, I believe, this will be the death of the small family processor.

Janice Fisher
Fisher Packing
Portland, IN 47371

Rhodes, Suzette

From: Glenn Davison [gwd2@hotmail.com]
Sent: Thursday, April 01, 2010 3:57 PM
To: Draft Validation Guide Comments
Subject: Comments-HACCP System Validation

Dear Mr. Almanza,
Springfield Paper Company, of Springfield, MO. is a 104 year old supplier of products to small meat processors across MO, KS, OK and Ar. The meat processors we service comprise about 25% of our business volume and represent a core base of business as a category. Our customer base to this niche is around thirty companies exclusive of spin-off businesses.
We are concerned that the expense required by the proposed HACCP systems validation will negatively impact the small meat processors we currently sell. These are not large companies-many have fewer than ten employees and are scattered in rural areas. They provide pockets of rural America with sustainable jobs as well as meat products in geographical areas which are not supplied by more convenient places to shop. Many of their employees as well as customers are multi-generational.
Not only meat processors will be affected as a result of the new regulations. An additional consequence is nearby businesses are able to purchase supplies from our distribution center because our delivery truck routes are built around our meat processors. Therefore, neighboring businesses could also face downsizing as distribution to rural areas is reduced or eliminated. Our company may be forced to eliminate drivers and warehouse personnel to adjust to fewer customers if these stringent regulations are adopted. This could result that the manufacturers of the products we sell would also be negatively impacted, resulting in further layoffs along the distribution chain.

Sincerely,
Glenn Davison

Glenn Davison
Sales Manager
Springfield Paper Company

Hotmail: Trusted email with Microsoft's powerful SPAM protection. [Sign up now.](#)

Rhodes, Suzette

From: Megan Powers [meganthom@gmail.com]
Sent: Saturday, April 17, 2010 11:40 PM
To: Draft Validation Guide Comments
Subject: Comments on the new proposed food safety bill

To whom it may concern:

I am happy to see that the United States is taking a closer look at food safety; however, I am concerned that the new regulations may not leave room for small distributors and local farms. I am a dedicated consumer of local meats, and I know the farmers who raise the food I eat. It is already an ordeal for them to find slaughterhouses that will accept one or two animals at a time without scheduling nearly a year in advance. The new proposed measures make sense for large slaughterhouses, but they will put an enormous financial strain on smaller shops. As a result, I fear that the small shops, which are rarely associated with food safety concerns, will be forced out of business.

I would like to see provisions made to the bill to give waivers, exemptions, or to find other (less expensive) ways of verifying that the processes and products of small slaughterhouses are still safe.

Sincerely,

Megan Powers

Rhodes, Suzette

From: James Carstensen [jlcprec@netins.net]
Sent: Friday, April 09, 2010 3:23 PM
To: Draft Validation Guide Comments
Subject: HACCP process validation

This proposed new mandate will present a tremendous burden on local meat processors. This is the exact opposite of what the focus should be. This will hinder the process of decentralizing food production, a stated goal of the Obama administration, and give the larger meat processors another advantage over smaller, local businesses.

This will cause many of the smaller meat processors to either go out of business, or reduce the variety of products that they offer for sale.

Many of the current safety procedures that have been used and documented for many years would no longer be accepted.

I have no connection with any meat processing business.

Jim Carstensen
Preston, Iowa

Rhodes, Suzette

From: Ryan Mucho [pastureland@live.com]
Sent: Thursday, April 08, 2010 9:08 PM
To: Draft Validation Guide Comments
Subject: Microbial Data Request

I myself am an up and coming pasture based, local producer of broilers, eggs, turkeys, rabbits, and eventually a non-local grass based dairy operation. I'm currently a union bricklayer member and have been laid off for 6 months now. With my agricultural marketing plan, I could easily have a much higher income just in the ag sector. If microbial testing was mandatory for the production and sale of any or all of the above commodities, depending on how costly it could be, would surely diminish some or all of my profit. I am not opposed to the testing because it is for the health and safety of the consumer, but if it hinders the dreams and lifestyles of us "consumer caring", small time, "true" farmers, it would clearly be unethical. Being small time, we cannot afford to sell an inferior product, nor would we want to because we truly care about our customers. If it must be that we have microbial testing performed on our commodities, at least let us sell directly to a consumer without the testing. If we sell to any restaurants then I would not oppose to the testing due to the safety of their customers and the reputation of their business. I ASK YOU PLEASE DO NOT, I SAY AGAIN, DO NOT MAKE US SMALL TIME FARMERS TEST OUR PRODUCT IF IT IS ONLY BEING SOLD DIRECTLY TO A WILLING CONSUMER!! WE WILL SURELY BECOME A THING OF THE PAST. Thank you for your time.

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