

Dear Mr. Almanza

My name is Kurt Klinner. I own a small meat plant in Wittenberg Wisconsin. We employ around 10 people with full and part time. We have been trying to keep up with the current proposed rule to validate our HACCP plans. If it is as how our meat organizations say we will most likely be out of business. We process close to 800,000 lbs. Of beef and pork a year and this is for individual people. If we are out that would not affect a large plant at all. They would not have to add one employee to make this up. Hopefully this step will be looked at and not done in a devastating way. Small and very small plants like ours have a place. We butcher for people that raise their own meat and want to eat their own. Some of these people have to be very careful for antibiotics and other hormones and chemicals. Please be careful when reviewing this proposal. I have chosen not to go with the generic form from our organizations. The reason is that this could be very serious to us, and hopefully this shows that. If this is limited testing for validation we could survive it. If we have to prove all steps, which have been done by universities and Drs. Under better conditions than a small plant could do, we will be in trouble. Thank You Kurt

Kurt Klinner
Pond-Hill Processing LLC
W16257 Co. Rd. Q
Wittenberg Wis. 54499
715-253-2491
klinnerk@wittenbergnet.net

To Whom It May Concern:

It has been brought to my attention that the USDA is in the process of proposing new rules regarding food safety at USDA inspected plants. We are a very small processor and employee about 12 to 20 employees depending on the time of year. Our operation is located in rural Kentucky and to give you an idea of how rural we are the towns' second largest employer. We work directly and indirectly with local farmers that raise and sell their livestock at farmers markets and retail outlets in Ky. The amount of volume that we do is very small compared to the huge manufactures, but to the local economy and family farms, processors like us are part of a vital service. Food safety is and always will be the most important part of our operation. We feel that we are producing some of the safest food products in the country. We would appreciate that when changing rules that please keep in mind that no matter how small the change it can have devastating financial effects on small producers and processors. Small producers and processors do not have the luxury of an in house laboratory and have to send samples to a private certified laboratory and this is very expensive. Example (a \$200.00 sample testing to a small processor could add 25 cents per unit, but the same test to a large manufacturer the cost would be less than 1 cent per unit). All we ask is please take this into consideration when changing the rules.

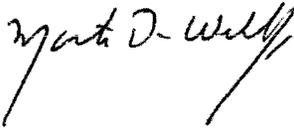
Thank You,

Martin Webb Jr.

Webb's Butcher Block

Payneville, Ky. 40157

270-496-4124



Board of Supervisors Cass County

5 West 7th Street / Atlantic, IA 50022

(712) 243-6661

FAX: (712) 243-4572

May 10, 2010

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

RE: Draft Validation Guide Comments

I am writing this as Chairperson of the Cass County (Iowa) Food Policy Council. The Council is committed to bringing together community members and organizations to promote stable food systems and access to healthy, locally-produced food for all. The Council's goal is to increase the consumption of healthy, locally-produced food while fostering more direct purchases between local farms, local business, and institutions.

Cass County, Iowa, is fortunate to have three lockers that are inspected and can offer various meats for retail. Of course, the Council has concern for food safety and believes the current procedures help ensure the safety of the meats from the locker. The Food Policy council is concerned that the new interpretations concerning HACCP System Validation Plans in Officially Inspected Meat and Poultry Plants will negate the goal of the Council and possibly put the lockers out of business and shift the present local business to the large packing houses.

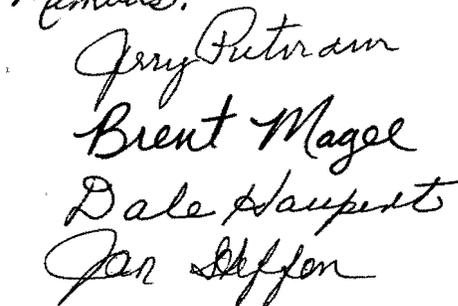
The Cass County Food Policy Council appreciates your consideration of these comments and will be anxious for your response.

Sincerely,



Emily Krenzel, R.D., L.D.
Chairperson of Cass County Food Policy Council
Cass County Court House
Atlantic, IA 50022
kree@casshealth.org

Members:



4 June 2010

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

Re: Comments – Draft Guidance on HACCP System Validation

Dear Mr. Almanza:

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

For the last ten years, I have bought all my meat from small, local producers. Never in this time have I found any fault with the quality of the product - and meanwhile, large-scale producers have had multiple, million-pound recalls of contaminated meat. Thus, I am concerned about the effects of the proposed validation requirements on the small businesses - and of their necessity.

The costs of the new requirements have the potential to put many small producers out of business. At the same time, it has not been shown that the requirements would lead to a safer end product. Clearly, the requirements in place for large-scale producers aren't doing the job. But how many people have been made sick, or killed, by meat from small-scale producers? (If nothing else, the small producers offer this advantage: if the meat does make someone sick, it's very easy to find out where the problem came from - on the other hand, as we've seen, it can be very difficult to make this determination with large-scale operations.)

I don't understand why we need these new regulations. No specific safety issue has been identified, so it's not clear why we need to change a system which seems to be working perfectly well. Instead, this change of regulation may well eliminate many smaller processors (which is bad for business and bad for consumer choice); it will put people out of work (at a time when we already have severe unemployment problems); and it will increase costs overall, without any corresponding increase in safety. So what's the point?

I trust my local producers. I don't want to see them driven out of business by expensive, unnecessary regulations. Therefore, I request that the Draft Guidance on HACCP System Validation be revised to state that no in-plant microbial testing is required of establishments which already follow the long-standing processes of HACCP.

Thank you for your consideration.



Ted LaPage
2026 NW Lance Way
Corvallis OR 97330

cc: Senator Jeff Merkley
Senator Ron Wyden
Rep. Peter DeFazio

Rhodes, Suzette

From: HG Thor at Guitar Lab [guitlab@woodwiz.com]
Sent: Wednesday, April 14, 2010 10:17 AM
To: Draft Validation Guide Comments
Subject: HACCP- validation req- exempt small meat plants

Please adjust proposed slaughterhouse requirements to reflect a sane policy to keep our local farms, businesses and communities thriving.

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

Thank you,
Harris Thor
Vestal, NY

"The proposed regulations would require every meat plant (no matter how big or small), to perform their own testing of carcasses, products, and machinery at every point of processing by collecting samples and then sending them to a lab. The data collected in these tests would be further documentation of pathogen control in the plant. Currently, smaller plants (who do not have the capabilities to perform these tests) are able to use previously collected data and apply it to their own methods. This has proved a safe and reliable method of controlling pathogens thus far.

Based on the figures presented in that document and the number of different products that Leona Meat Plant currently offers, (bacon, hot dogs, sausages, bologna, etc. in addition to our handling of raw meat cuts) the proposed regulations would have an additional cost to us and other small meat plants of over \$500,000.00 with an additional \$180,000 per year after that!

The proposed regulation would not only affect us, but would have direct implications for farmers with whom we do business. As a result of the added cost to us, we would have to raise our processing costs by \$.50-\$1.00 a pound! As the proposed guidance document is currently being interpreted, this is a very real issue with very real implications for us as a processor and you as livestock producers and interested stakeholders. By increasing the demands for pathogen control, the USDA is only making it more difficult for small, local slaughter facilities to exist."

Rhodes, Suzette

From: John and Marilyn Palmer [jpalmer16@stny.rr.com]
Sent: Wednesday, April 14, 2010 10:22 PM
To: Draft Validation Guide Comments
Subject: Validation for HACCP

Dear USDA,

As a customer who buys meat exclusively from local organic farmers, who utilize small local meat processors, I am very alarmed by the proposed new interpretation regarding validation fro HACCP. As I understand it, the proposed regulations would require every meat plant (no matter how big or small), to perform their own testing of carcasses, products, and machinery at every point of processing by collecting samples and then sending them to a lab. The data collected in these tests would be further documentation of pathogen control in the plant. Currently, smaller plants (who do not have the capabilities to perform these tests) are able to use previously collected data and apply it to their own methods. This has proven to be a safe and reliable method of controlling pathogens thus far. Most other industries us the same sort of best manufacturing practices (BMP's) to monitor their processes.

Our local meat processor, Leona Meat Plant, estimates that the proposed regulations would have an initial cost of \$500K with an additional \$180k annually, based on the figures presented in the proposed document, for their situation. As a result of the added cost they would have to raise their processing costs by \$.50-\$1.00 a pound! Our local farmers are already struggling to provide quality meat at a competitive cost and another \$1.00/lb would likely put many out of business, which in turn would result in the closure of meat processors like Leona. This would have a huge negative economic impact on our region.

For those of us who depend on local farmers for fresh, clean, high-quality food, it would be a huge sacrifice to lose them. My wife and I are convinced that our excellent health at age 65 depends, in large part, on local organic meat and produce. We urge you to reconsider the proposed regulations and come up with a plan that allows our local meat farmers and meat processors to remain competitive.

Sincerely,
John W. Palmer
Athens, PA

Rhodes, Suzette

From: Dave Kronlage [dkronlage@yahoo.com]
Sent: Tuesday, April 06, 2010 9:41 PM
To: Draft Validation Guide Comments
Subject: comments

Dear Mr. Almanza

I have been informed by our meat processor that a rule could be changing in the USDA regulations.

From my understanding of this it will cost my small town meat processor upwards of \$350,000 to comply with this new rule. We are the owners of a small value added pork company that has been in business now for ten years. It is at this point very hard to keep our prices in line with the big conglomerates, if this rule were to go into effect it will put us out of business as we will not have a processor to take our hogs and make them into the products that we need at an affordable price.

I thought we were supposed to be getting back to buying local and being a society that is concerned about the local economy. This will only hurt that concept altogether in the meat industry. Please reconsider making this change.

Sincerely,

Dave Kronlage
Manager
Delaware County Meats
563-875-6388

Rhodes, Suzette

From: Mary Francis [mary.francis111@gmail.com]
Sent: Saturday, April 10, 2010 4:45 PM
To: Draft Validation Guide Comments
Cc: Rep Bill Nations; Rep. Wallace Collins; OkSen.Jonathan Nichols; Rep. Tom Cole; Senator Jim Inhofe; Senator Coburn; Sen. Paul Muegge
Subject: Comments - Draft Guidance on HACCP System Validation

Re: Comments - Draft Guidance on HACCP System Validation

Your new proposal is going to be very expensive for smaller local meat suppliers. The new validation requirements would cost them about \$12,000 for testing on their cooked products and \$2500 on the fresh products. It would basically cost around \$50,000 per year to comply, if your proposal goes into effect. These costs would have to be passed on to me, the consumer, or else they might go out of business. Many people would lose their job, and the economic impact on our local economy would be devastating. This is no time to throw people out of work.

It makes no sense to risk closing down local processors when they have been safely operating under your current system. Our local meat supplier uses FSIS standards, FSIS Federal Register documents and peer reviewed studies to maintain reliable processes. Please do not require this expensive new validation.

The USDA should preserve my right to buy locally grown meat from local producers. The importance of our local meat processors to our local economy can not be overestimated.

Please revise the Draft Guidance on HACCP System Validation to clearly state that no in-plant microbial testing is required, as long as they are following the long-standing, safe processes of HACCP.

If it ain't broke, don't fix it.

--

Mary Francis
850-C Cardinal Cr. Condos
Norman, OK 73072
405 474-0695

Rhodes, Suzette

From: Tracy Wells [tracywilson@gmail.com]
Sent: Monday, April 19, 2010 5:08 PM
To: Draft Validation Guide Comments
Subject: save the small slaughterhouses

To Whom It May Concern:

I am writing to oppose the reinterpretation of regulations of slaughterhouses that places a disproportionate burden on those abattoirs that cater to local farms.

- If we lose some of our small USDA processors, we will lose livestock farms. Small farmers can't compensate for the amount of money they lose by not getting an animal to slaughter on time. The end result means less choice for consumers and more domination of the meat market by large corporate factory farms.
- Regulation reinterpretation would mean that small farmers will need to increase the cost of their meat by \$.50 to \$1.00 per pound. Local meat already costs significantly more than large (factory) farmed meats, and such a drastic price increase is likely to scare away budget-conscious customers.

Small farmers have been struggling for years with the decline in local slaughterhouses that can accommodate their needs. Don't make it harder on them by imposing stricter regulations that only the giant factory farms can afford. Don't reduce the choices of the American consumer.

Regards,

Tracy Wells

Rhodes, Suzette

From: keith martin [chefkeifus@gmail.com]
Sent: Friday, May 14, 2010 5:53 PM
To: Draft Validation Guide Comments
Subject: Draft Guidance on HACCP System Validation comments

The intent of HACCP is to prevent contamination of meat by harmful pathogens. It does so by instituting well-recognized, established processes and controls set by the USDA itself.

But on March 19, the FSIS published a Draft Guidance on HACCP System Validation, outlining new rules which would institute much more intensive testing of all meats, whether or not a problem has been identified. These requirements will cost small plants tens of thousands of dollars, perhaps even hundreds of thousands, every year -- a financial burden appears great enough to force many to shutter.

Now, the reason these rules are being proposed is clear: millions of pounds of recalled hamburger, e. coli food poisoning incidents and distrust by consumers and foreign trading partners of U.S. produced meat. But these problems have arisen at plants that handle thousands of animals a day in extremely fast-moving production lines.

Small plants operate quite differently. one small plant, T&E, for example, processes around 20 animals a day. They know which farmer delivered each animal, often because that same farmer wants his butchered animal back so he can sell it. They're not mixing thousands of animals of unknown provenance into piles of hamburger meat and then sending it all around the country.

Perhaps a large plant slaughtering 5,000 animals per day can afford its own lab and microbiology staff, and can pass the cost along to the consumer. And perhaps they should, given the recalls arising from these large-scale facilities. But most small plants can't handle it.

The USDA needs to recognize that "One Size Fits All" inspection no longer works. The risks arising from mega agribusiness plants are far different from community-based plants and they should be regulated appropriately. This does not mean lowering the hurdles for small processors. Rather it means tailoring regulations to the scale and risks of an operation. That way small processors can provide what the consumer wants – safe AND local food, not just the shrink-wrapped anonymous meat in the supermarket.

Thank you,

Keith Martin

TURASKY'S MEATS

"Award Winning Meats"!

"Y-T Packing Co. Since 1949"

4/1/2010

**Y-T Packing Co
1129 Taintor Road
Springfield, IL 62702
EST. 31731**

Address

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

Email: DraftValidationGuideComments@fsis.usda.gov

Re: Comments - Draft Guidance on HACCP System Validation

Dear Mr. Almanza:

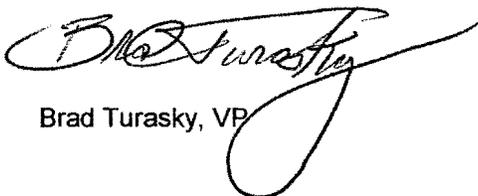
Y-T Packing Co. respectfully submits these comments regarding the Draft Guidance on HACCP System Validation that were publically released on March 19, 2010.

Y-T Packing Co. has done research on these new testing procedures. The new calculations done are around \$109,468.80 in the first year of testing and then around \$40,000.00 every year after that. This does not include our labor. Y-T Packing Co would like to point we do not have a person with a PHD on staff and would have to hire someone that has one to conduct these test. I would be very concerned about how other meat plants come up with their own studies. We think there would be large variations in validation procedures.

Y-T Packing Co. has notified The Illinois Director of Agriculture and he is very concerned about the affects this will have on the Farm to Fork program and others like it. If plants like us and others go to non-inspected products or close then the local farmers will not have any meat products to sell at local farmers markets.

Y-T Packing Co. appreciates the chance to comment on the Draft Guidance on HACCP System Validation. Thank you for your time and consideration.

Sincerely,



Brad Turasky, VP

Mr. Almanza
Docket Clerk, FSIS
Room 2-2127
5601 Sunnyside Avenue
Beltsville, MN 20705

Dear Mr. Almanza:

We are opposed to the Department of Federal Safety and Inspection Services (FSIS) drafted guidance S.510 FDA Food Modernization Act, requiring small meat processing plants to do excessive testing of all inspected meat products.

We purchase our meat, in Tulsa, Oklahoma, from a small meat processing plant. The cost to that meat processing plant would be an initial cost of \$55,000 and an increase to annual cost of over \$11,000 to comply with S.510 FDA.

This small meat processing plant routinely test their products and has never had an e-coil problem. It would cause that small meat processing plant to go out of business and many other small meat processing plant, at a cost of thousands, if not millions, of jobs across the country.

Sincerely yours,

Robert and Susan Ibanez

7114 S.145th West Ave

Sapulpa, OK 74066



DEPARTMENT of AGRICULTURE
STATE OF MISSOURI
JEFFERSON CITY

JEREMIAH W. (JAY) NIXON
GOVERNOR

DR. JON HAGLER
DIRECTOR

*Serving, promoting and protecting the agricultural producers, processors
and consumers of Missouri's food, fuel and fiber products.*

April 29, 2010

Docket Clerk
USDA, FSIS
George Washington Carver Center
Room 2-2127
5601 Sunnyside Avenue
Beltsville, MD 20705

Dear Mr. Almanza,

The Missouri Department of Agriculture (MDA) respectfully submits these comments regarding the "Draft Guidance on HACCP System Validation" that was publically released on March 19, 2010.

MDA values its partnership with the United States Department of Agriculture, Food Safety Inspection Service (USDA/FSIS), and believes that our mission to protect the consumer is imperative. However, MDA acknowledges the concerns expressed by stakeholders regarding the "Draft Guidance on HACCP System Validation". Specifically, the proposed changes could present undue financial burden on small/very small establishments, as well as a subsequent negative effect on individual livestock producers and niche markets if these small businesses relinquish inspection. In addition, we feel that the loss of inspected small/very small establishments would be counterproductive to USDA's "Know Your Farmer, Know Your Food" initiative.

MDA recognizes the importance of the continuing outreach services, to small/very small meat and poultry establishments, provided by FSIS. Traditionally, small/very small establishments have limited technological and financial resources. Therefore, FSIS guidance documents are particularly useful tools for understanding and supporting decisions made in the hazard analysis. The importance of these guidance documents cannot be over emphasized. It is essential that the information contained within these documents identify a clear purpose, address a significant need, and be beneficial to the target audience. Although FSIS guidance documents are not considered regulatory, these documents are used as a resource by FSIS regulators to determine the validity of HACCP systems at inspected establishments.

In summary, while we certainly appreciate and share your emphasis on continued improvement of food safety, it is vitally important that we do not hinder the ability of small/very small establishments to continue to operate under inspection. Onerous requirements on small/very small establishments could result in plant closures and/or failures. The resulting impact would have far-reaching negative effects on Missouri communities and agriculture.

The Missouri Department of Agriculture is confident that all comments will be carefully considered, and further evaluated, prior to finalizing the "Draft Guidance on HACCP System Validation" and appreciates the opportunity to provide our input. Thank you for your time and consideration.

Best regards,

Dr. Jon Hagler
Director of Agriculture

JH/ja



Your partner for standout foods.

Docket Clerk
USDA (FSIS) Room 2-2127
George Washington Carver Center
5601 Sunnyside Ave.
Beltsville, MD 20705-5000

May 14, 2010

We received a letter asking for corporate opinions regarding how the proposed food safety regulations would affect our production facility. It seems that the letter is geared toward slaughterhouses, rather than processing facilities such as ours.

We are a custom manufacturer of soups, sauces, gravies and fillings. We bring in both raw and cooked meats, and produce hot-fill and cook-in-bag items.

We have a detailed recall procedure on file as part of our quality assurance and food safety programs.

We also have a HACCP program in place. It is updated as new items are added to our production list, and the entire plan is reviewed yearly.

If I can be of further assistance, please let me know.

Sincerely,

A handwritten signature in cursive script that reads "Kathy Saldana".

Kathy Saldana
Custom Food Solutions
Food Scientist
(502) 671-6966 ext. 22
(502) 671-6906 Fax

(502) 671-6966 Office • (502) 671-6906 Fax
2505 Data Dr. • Louisville, KY 40299

Lance's Farm Vittles
18700 Miami Foley Road
Bay City, OR 97107

May 26, 2010

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

Re: Comments – Draft Guidance on HACCP System Validation

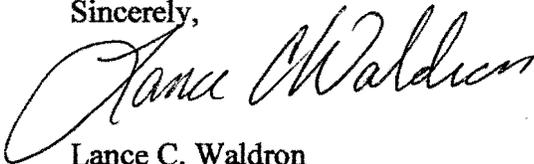
Dear Mr. Almanza:

Lance's Farm Vittles respectfully submits these comments regarding the Draft Guidance on HACCP System Validation that were publicly released on March 19, 2010.

We are a small farm business that directly sells meat to local customers. Farming is our sole source of income. As a livestock producer/farmer who depends on the meat industry we are concerned about the process validation of inspected establishments HACCP programs. Through current communications with our current butcher, whom we respect and trust, it has become apparent that initiating systems validation in small and very small processing establishments would considerably affect our business as well. We believe that as written the HACCP program will cause federal and state inspected processing plants that we rely on to be either forced out of business or put us in financial jeopardy by passing the costs onto us.

Lance's Farm Vittles appreciates the chance to comment on the Draft Guidance on HACCP System Validation. Thank you for your time and consideration.

Sincerely,



Lance C. Waldron
Lance's Farm Vittles

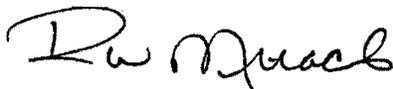
cc: U.S. Senator Jeffery Merkley
U.S. Senator Ron Wyden
U.S. Representative Kurt Schrader
Oregon Representative Deborah Boone
Oregon Senator Betsy Johnson

U.S. Small Business Admin.
Oregon Farm Bureau
Oregon Beef Council

USDA Docket Clerk
George Washington Carver Center
5601 Sunnyside Ave.
Beltsville, MD. 20705

My name is Rodney Miracle, I own and operate a small farm in central KY, (Miracle Farm). I am currently involved in small scale production of custom beef and poultry products. I am raising these animals in a natural way primarily on grass pasture. I am aware you are considering changes to rules regarding food safety. My concern is that the new rules might make it cost prohibitive for a small producer to comply. I am only processing aprox. 10 beeves per year and 100 chickens. The profit margin is small as it is. It is a continuing struggle to stay on a small farm. The other concern is that the new rules would cause processors to scale back from USDA processing to custom severely limiting our options for meat processing. We are continuing to lose small farms and farmers daily and to impose more cost and regulations would only add to this problem. The small farmer that is direct marketing is especially concerned about food safety. Most of the problems in are food system is coming from the large confinement operations but these are the only ones who can afford the extra cost. Please take this into consideration when making changes.

Rodney Miracle
Miracle Farm
3035 KY Hgy 3249
Stanford KY 40484
606-282-0368

A handwritten signature in black ink that reads "Rodney Miracle". The signature is written in a cursive, flowing style.



Vermont Grass Farmers Association

P.O. Box 142 Randolph Center, VT 05061

ORIGINAL

2010-2011 Board Members

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Brookfield Agricultural Services

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

ORIGINAL

April 6, 2010
RECEIVED
APR 19 2010

Dear Mr. Almanza:

The Vermont Grass Farmers' Association (VGFA) respectfully submits these comments regarding the Draft Guidance on HACCP System Validation that were publically released on March 19, 2010.

As an association of over 250 livestock producers who depend on the meat industry for the vitality of our farms and rural communities, our concern regarding process validation of HACCP programs in inspected abattoirs have prompted the VGFA to express our concern.

First, it has been our experience and observation in small-scale plants that the existing HACCP programs are already working, and we question the need for process validation at all.

Second, through communication with our membership and regional meat processors it has become apparent that initiating systems validation in these establishments would considerably affect our businesses as well. 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 or pass the increased cost on to us, ultimately putting our businesses in financial jeopardy. The loss of income resulting from this will be devastating to all of our members because our business depends on very small and small establishments.

Third, the Small and Very Small plants under USDA definition will be the most negatively affected by process validation as an additional cost proportionally higher than in larger slaughter facilities. If USDA must require process validation, we respectfully request that Small and Very Small plants be exempted from this requirement.

Our region has suffered from a loss of small processing plants in the last two decades and even with a modest number of new and updated facilities we are still suffering from a severe shortage of capacity. ANY additional requirements placed on them or curtailing their ability to work efficiently will have a negative impact on our regional "local food" culture and business.

The Vermont Grass Farmers' Association appreciates the chance to comment on the Draft Guidance on HACCP System Validation. Thank you for your time and consideration.

Sincerely,

Sam Smith, President
Vermont Grass Farmers Association

CC: Senator Patrick Leahy
Senator Bernie Sanders
Representative Peter Welch
VT Secretary of Agriculture Roger Allbee



April 5, 2010

LAND O' LAKES INSURORS

RECEIVED
4-9-10 huc

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

RE: Comments – Draft Guidance on HACCP System Validation

Dear Mr. Almanza:

Land O' Lakes Insurors respectfully submits these comments regarding the Draft Guidance on HACCP System Validation that were publicly released on March 19, 2010.

As a supplier/provider of insurance to the meat industry, our concern regarding process validation in inspected establishments HACCP programs have prompted Land O' Lakes Insurors to comment our concern. Through communication with our meat processing customers and trade organizations it has become apparent that initiating systems validation in these plants would considerably affect our companies. It is our believe that this will cause many of the federal and state inspected processing plants we service to be forced out of business, or their operations significantly reduced. The loss of income resulting from this will be devastating to Land O' Lakes Insurors because 15% of our business originates from small or very small plants.

Land O' Lakes appreciates the chance to comment on the Draft Guidance on HACCP System Validation. Thank you for your time and consideration.

Sincerely,

LAND O' LAKES INSURORS

Warren R. Collins
President

cc: Representative Bob Dixon, 201 W. Capital Avenue, Room 315, Jefferson City, MO
65101-6806

Senator Norma Champion, 201 W. Capital Avenue, Room 320, Jefferson City, MO
65101-6806

Senator Christopher S. Bond, 274 Russell Senate Office Bldg, Washington, DC 20510

Senator Claire McCaskill, SH-717, Hart Senate Office Bldg, Washington, DC 20510

Representative Roy Blunt, 2229 Rayburn Bldg, Washington, DC 20515

1630 S. ENTERPRISE

P.O. BOX 4263

SPRINGFIELD, MISSOURI 65808

417 - 887-1373 / 800 - 237-2834

FAX 417-887-8209