

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

RECEIVED
MAY 03 2010

To whom it may concern;

I am not familiar with all the details of what will be required of our local meat lockers. I have been buying meat from our local lockers for 35 years and have never had a reason to doubt the quality or the cleanliness of our lockers and their products

If the lockers are forced to close because of your action you will be doing this area a great disservice. A lot of people depend on our local lockers for quality meats. They are a lot more dependable than the meat packers that you try to inspect. The only thing you can depend on at meat packing plant is they can't wait until they can slip something over on the inspector.

Gene Eyberg
1407 Roosevelt dr.
Atlantic IA 50022





THE *Louisiana Way* - TASTY

2205 Texas Avenue - P. O. Box 3900 - Shreveport, LA 71133-3900
Phone (318) 222-0067

RECEIVED
APR 28 2010

April 16, 2010

To: Docket Clerk USDA, FSIS, Room 2-2127 5601
Sunnyside Ave.
Beltsville, MD 20705

We are a very small processor in North Louisiana. We do not slaughter, but we process raw and some cooked products, thus have several HACCP plans and CCP's.

The cost of the proposed HACCP validation guidelines would be devastating to our plant. Although we have low volume production, our plant meets the needs of our area and provides jobs. In many cases the costs would exceed the sales.

Please consider these issues.

Pete Miller

A handwritten signature in cursive script that reads "Pete Miller".

President, Foodway Inc.

4/16/2010

VALIDATION

4/09/10

Standard Casing
5743 Enchanted View Lane
Waunakee, WI 53597

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

Email: DraftValidationGuideComments@fsis.usda.gov

RECEIVED

Re: Comments - Draft Guidance on HACCP System Validation

Dear Mr. Almanza:

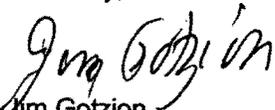
Standard Casing respectfully submits these comments regarding the Draft Guidance on HACCP System Validation that were publically released on March 19, 2010.

As a supplier/provider of sausage casings to the meat industry, our concern regarding process validation in inspected establishments HACCP programs have prompted Standard Casing to comment our concern. Through communication with our trade organizations and meat processing customers it has become apparent that initiating systems validation in these establishments would considerably affect our companies as well. It is our belief 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 Standard Casing because much of our business originates from very small and small establishments.

We work with our customers to ensure we provide supplies that help them produce safe meat. From our discussions with our meat processing customers, we know that they do everything in their power to produce safe food. Adding additional testing requirements is unlikely help them produce safer food. We know firsthand that the meat processors possess incredible knowledge on the subject of food safety and hope you consult them when formulating any rules on this subject.

Standard Casing appreciates the chance to comment on the Draft Guidance on HACCP System Validation. We hope you will consider the serious harm passing this law will do to our business, along with others like ours, and reformulate the rule. Thank you for your time and consideration.

Sincerely,



Jim Gotzian
Standard Casing

EDGEWOOD BOARD OF ECONOMIC DEVELOPMENT

April 6, 2010

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

RE: Comments – Draft Guidance on HACCP System Validation

Dear Mr. Almanza:

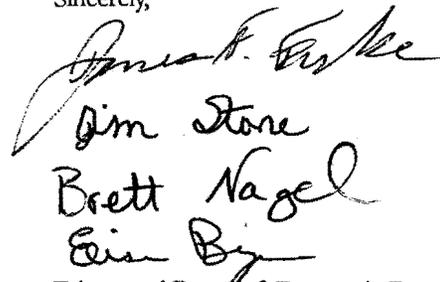
This letter is written on behalf of the small agricultural meat processors, most importantly, the Edgewood Locker in Edgewood, Iowa. The Edgewood Locker is major employer in the community. The Edgewood Locker also brings in customers from all over the tri-states. They provide a significant positive economic impact in Northeast Iowa. The Edgewood Locker is one of the largest employers in our community. The changing of their process or closing of their facility would dramatically affect the economic vitality of Edgewood.

We are concerned about recent actions by the United States Department of Agricultural that would affect the economic viability of this local industry. It is being proposed that additional testing of products is going to be required. This is not feasible for the Edgewood Locker that has numerous product lines to logistically perform. The cost is too great to have it be implemented. The Edgewood Locker estimates the cost of implementing the proposed guidelines would be between \$350,000 and \$850,000. This would be detrimental to the Edgewood Locker and any small meat processor.

At the Edgewood Locker food safety is the number one priority. The facility and staff are USDA inspected. It was a lengthy and costly process, but was seen as being important to the future of this business. We ask 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.

We look forward to hearing a positive resolution to this matter. You may call the number below to discuss this matter further and it's affects on the community of Edgewood and all of Northeast Iowa.

Sincerely,



Edgewood Board of Economic Development
Board Members

cc: Area Legislators

Indiana Meat Packers & Processors Assn.

300 West Walnut Street
Portland, IN 47371

April 12, 2010

Al Almanza
USDA, FSIS, Room 2-2127
5601 Sunnyside Avenue
Beltsville, MD 20705

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APR 19 2010

ORIGINAL

Dear Mr. Almanza:

Please consider the negative effect the new HACCP Validation proposal will have on small business. Also, please consider the question, "Are HACCP procedures really ineffective?" When you consider the amount of meat consumed, how can you believe the system is broken? Also, consider the problems, if any, with the small processor.

No matter how many regulations the government imposes, 100% safety for anything can never be guaranteed. Considering the amount of meat consumed, how can you believe we need more regulations? Consider other things, not nearly as safe, and is our government going to regulate them out of business? Automobile travel does not begin to be as safe as food consumption, and no matter how many regulations you would put on the industry, you could never make it 100% safe because the consumer will continue to cause accidents. When considering all the problems that have occurred, how many would NOT have happened if the consumer would have handled the meat properly (as the label states)?

No one wants a safe product more than the small meat processor. Their livelihood depends upon it. Their family name is on that product. Their family pride went into making that product. They make every effort to insure safe wholesome products. One recall from their plant, and their doors will be CLOSED. They will be finished!

Your new proposal will put most small processors out of business. There is no possible way they can absorb the cost. Considering the small amount they produce at a time, the cost per pound will be too great. They can no longer be competitive with larger companies. The estimated cost of this new proposal is greater than most small processing plant's profits.

Indiana has approximately one hundred small meat processors and their small businesses support many families. If you pass this new regulation, Indiana will lose many businesses and many will be left without jobs. Multiply this times 52 states.

Please consider educating the consumer, beginning with the education of our students in elementary schools. Every year, students should be taught in health class how to handle food properly. By the time they graduate, they should have it mastered. Also, there should be fines on any restaurant who intentionally sells undercooked hamburgers. It angers me every time a waitress asks me how I want my hamburger cooked. This should be illegal!

Please do not regulate the small processor out of business!

Sincerely,

Janice Fisher

Janice Fisher

Executive Secretary

Indiana Meat Packers & Processors Assn.

WISCONSIN **ASSOCIATION**

P.O. Box 327, Lancaster, WI 53813 • 608-723-7551 • Fax: 608-723-7553 • e-mail: wppa@wppa.org

April 27, 2010

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

Re: Draft Guidance on HACCP Systems Validation

Dear Mr. Almanza:

The Wisconsin Pork Association is opposed to the proposed rule on HACCP System Validation.

Small meat processors provide a niche market for several hundred pork producers in Wisconsin. We are concerned that these drastic changes may force many of these processors out of business if they have to implement the proposed rule, which has not yet been scientifically proven. Some estimates by the industry put the cost of complying with the rule at over \$100,000 per plant.

We believe our meat inspection program is among the best in the world now. We support improvements that can be implemented if they fit within the framework of our current program and the costs are reasonable.

We believe an open dialogue with industry groups will provide improvements that are cost effective and continue to improve our outstanding safety record.

Once again, WPA believes the small meat processors are very important to family pork production in Wisconsin. Thank you for the opportunity to comment.

Sincerely,



Howard AV Roth
President
Wisconsin Pork Association

RAINS NATURAL MEATS
23795 260TH STREET
GALLATIN, MO 64640
660-663-3674

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APR 19 2010

April 14, 2010

As an owner of a USDA Processing/Slaughter plant I have great concerns on the new HCAPP Plan they are planning on enforcing. Not only does our plant do the mandatory testing, we voluntarily do the Ecoli 0157H7. We have never had a positive test on 0157H07 or generic ecoli in the ten plus years we have been in business. For our business to go to the new plan it would be financially staggering to run all these tests. Not only would the added product be lost to sales, the cost of the test keep getting more expensive. The figures that I have received in our area prove that we cannot add that price to our product and be able to sell our products. The final outcome would be for us laying off some of our staff to cover the costs and then eventually closing our doors. There are several reasons I can see why USDA is pushing this program:

1. It is USDA's way to do away with the small and very small plants.
2. USDA's way of cutting back on their number of inspectors
3. USDA is yielding to the animal rights activists and vegetarians to do away with meat consumption.

Furthermore the financial burden you will be putting on the city and county levels will be unbelievable nationwide, with unemployment and commerce.

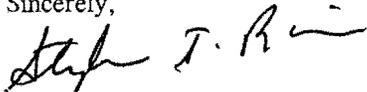
I would hope you would think this project through before making any rash decisions.

The small plants I know of personally produce a clean, healthy product. What USDA needs to understand is that once it leaves our doors it is up to the consumer to handle the products in a responsible way.

Processors are getting a bad reputation due to the fact consumers do not know how to handle products in their homes, have clean counters, correct temperatures and the correct way to thaw products, etc.

In my estimation you will be putting more of an economical and financial stress on the small communities and processing facilities.

Sincerely,



Rains Natural Meats



April 7, 2010

Alfred V. Almanza
Administrator, USDA FSIS

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

Re: Comments – Draft Guidance on HACCP System Validation

Dear Mr. Almanza:

Multivac 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 packaging equipment to the meat industry, our concerns regarding process validation in inspected establishments with HACCP programs have prompted Multivac to voice 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 belief 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 Multivac because 60% of our business originates from small or very small plants.

Additionally, many of these plants have Multivac packaging equipment that could become available on the used market, which would increase the number of machines in the workplace that are not up to current, state-of-the-art, sanitary designs.

Multivac currently services several hundred of these size plants and the financial impact on our business would be affected should many of these close.

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

Sincerely,

Cem Yildirim
Key Account Manager
Multivac, Inc.

W&G Marketing Co., Inc.
Executive Office Building
413 Kellogg Ave. • E.O. Box 1742
Ames, Iowa 50010-1742
515/233-4050 • FAX 515/233-6229

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APR 19 2010



W&G

Marketing Co., Inc.

**Producers
& Exporters
of Quality
Meat
Products**

April 14, 2010

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

Ref: Comments – Draft Guidance on HACCP System Validation

Dear Mr. Almanza:

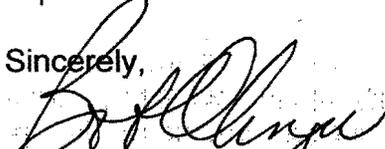
Food safety has been a top priority not only since the implementation of HACCP but long before HACCP was implemented. As operators of two Federally Inspected Iowa processing plants, we feel HACCP has been very effective in preventing harmful pathogens from entering the meat supply. However, the recent draft compliance guide on HACCP systems validation is a grave step backward.

HACCP is a proven system of food safety prevention. HACCP is based on the use of scientifically proven documents. However, this validation initiative retreats to far reaching in-plant micro testing in attempt to control pathogens. Plants, neither big nor small, should be mandated to validate HACCP effectiveness through mandatory micro pathogen testing. Not only is this initiative a huge step backward, it will result in significant added expense for any meat processing plant hoping to survive. The estimated costs for micro testing will, without fail, threaten the survival of many plants, especially the smaller plants.

In summary, we respectfully request that the Draft Guidance on HACCP System Validation be revised to clearly state that no inn-plant microbial testing is required when an establishment is following the long-standing, safe process of HACCP.

We are appreciative of the opportunity to comment on this very important issue.

Sincerely,


Robert P. Olinger
Vice President, Operations
W & G Marketing Co., Inc.



Member of:



Marvin J. Walter
Chairman
515-233-4050 (O)
515-292-9212 (H)

Darren T. Dies
President
515-233-4774 (O)
FAX: 515-233-4773

Robert P. Olinger
VP - Operations
515-827-5436 (O)
FAX: 515-827-5437

WAGNER MEATS, LLC

Mt. Airy Locker Company

The Quality Meat People

P.O BOX 51
604 N. MAIN ST.
MT. AIRY, MARYLAND 21771
829-0500 or 831-7440
FAX (301) 829-6502

ORIGINAL

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APR 19 2010

April 13, 2010

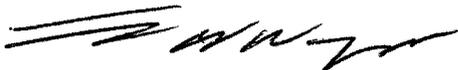
Docket Clerk, USDA, FSIS
Room 2-2127
5601 Sunnyside Avenue
Beltsville, MD 20705

To Whom It May Concern:

I wanted to take this opportunity to comment on the issue of the HACCP validation guidance.

Being in the business since 1953, I have seen a lot of things happen regarding USDA guidelines and inspections, both good and bad. The one thing that has always been foremost in having a successful meat establishment is keeping everything "clean". When HACCP was originated it was confusing to all that were involved, and the result was a cleaner product with a check and then a double check. There is no way I will be able to afford the initial validation, let alone any ongoing validations. These validations will cause me to close my doors and force me out of a successful business.

Yours truly,



Thomas Wagner
General Manager

hw

SLAUGHTERING - PROCESSING



Meats Retail & Wholesale
Frozen Food Lockers



Beef for Freezer
Sides & Quarters

Graziano Brothers, Inc.

Wholesale & Retail Italian Foods

1601 South Union St.
Des Moines, Iowa 50315

515-244-7103 Phone
515-243-2228 Fax
gbros@qwestoffice.net



RECEIVED
APR 30 2010

April 9, 2010

Mr. Tom Vilsack
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, DC 20250

Re: FSIS Draft Compliance Guide on HACCP Systems Validation

Dear Mr. Vilsack:

Graziano Brothers Inc., respectfully submits serious concern regarding FSIS's (Food Safety and Inspection Service) recent Draft Compliance Guide for all HACCP approved plants throughout the nation. The compliance, once mandated, will require ALL processing plants (federal and state inspected) to be validated plants. In short, they are requiring the absolute impossible from processors, especially the small and very small plants.

As an Iowa native, I am sure you are aware of the small meat industries throughout the state. They are your local meat lockers, custom-plants, and processing plants such as ours. I hope you are aware of our product, Graziano's famous Fresh Italian Sausage. We are a proud to service the Des Moines area and surrounding communities within our state for 98 years. We also boast that our sausage reaches most states in the United States once shipped by customers to their families who "can't live without our product". This says quite a bit about an Iowa-made product. But that can easily change.....

Enclosed you will find a copy of my petition sent to Mr. Almanza from the Department of FSIS. He has invited comments regarding this issue until April 19th, 2010. **TIME IS OF ESSENCE!** Please review the letter along with a fact sheet provided by the American Association of Meat Processors. Hopefully this will provide some enlightenment on our predicament as well as others small plants within the state of Iowa.

WE ARE IN DANGER OF CLOSING OUR BUSINESS due to the exorbitant and unjustified expense this will require. The proposed requirement will not produce any safer product than what is already provided. It is requiring an extra and expensive measure without providing justification for such stringent changes.

Please help us in our plight. If for any reason, **to sustain the livelihood of small businesses, like ours, in the state of Iowa.** Many ancillary businesses and workers are at stake as well.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Frances Graziano", written over a horizontal line.

Frances Graziano, President
Graziano Brothers, Inc.

May 27, 2010

Dear USDA,

Please do not change HACCP. It will make it impossible for small scale slaughterhouses to comply. Small local meat processors have always supported food safety. But small plants cannot afford their own lab and microbiology staff. The new procedures do not take into account whether or not the small producers have ever had a positive result.

"One size fits all" inspection no longer fits current industry practice and consumer demand. The new HACCP requirements will cause a disaster in a portion of the industry that is growing for the first time in years. Please find a way to split the agribusiness mega-plants from the consumer based small local plants.

Please find a better way.

Sincerely,
Issahel Beichl



PATRICIA MARKHAM
Administrator

Cass County Memorial Hospital

1501 East 10th Street

Atlantic, Iowa 50022

712-243-3250

May 24, 2010

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

RE: Draft Validation Guide Comments

I am writing concerning the HACCP System Validation on Plans in Officially Inspected Meat and Poultry Plants. As Food Service Director of Cass County Memorial Hospital in Atlantic, Iowa, my passion for supporting local business has led to the use of local foods in the Food Service department of the hospital.

The Food Service department uses locally-raised produce, and more uniquely, locally-raised livestock, which is inspected at the lockers during slaughter. I understand this new interpretation may prevent the use of the local meat processed at the local lockers.

The hospital's initiative of using local foods has been received well by the community and supports the "Know Your Farmer" initiative which was proposed to support small, local food producers. I'm concerned that the new interpretation discriminates against small lockers that process more than one species of livestock and produces a wide variety of products. I have felt comfortable and safe to use the present procedure and am afraid the new interpretation will force the hospital business away from the local farmers and lockers, and give it back to the large packing houses.

Thank you for your consideration of my comments. I will look forward to your response.

Sincerely,

Emily Krengel, R.D., L.D.
Food Service Director
kree@casshealth.org

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

Dear USDA,

I am writing because I buy all of my meat directly from local farmers in Minnesota. These men and women are amazing. I have learned so much about the work of farming and life on the farm through talking to them and visiting the farms on open house days. I was flabbergasted to hear that I may not be able to support these wonderful people and enjoy the best meat in the world because the USDA is about to add another layer of regulation that will be impossible for the small processors to afford. It seems to me that the new cost of doing business is simply a giveaway to the industrial meat industry at the expense of the small guy. This makes no sense. The recalls and contamination are linked to the corporate processors where it is impossible to even figure out where the contamination came from. The added costs will be a minimal incentive for them to clean things up. The small processors and producers are known personally by the farmers who use the facility and the customers. Any major problem would rather quickly put them out of business. Because of their size and personal relationships they actually work harder to keep a clean facility and provide a safe product. Forcing each farmer to spend huge sums of money to test each of dozens of meat products will make it impossible for them to continue to have good, local, and safe meat available for me and my family.

My interest is both selfish, I only eat meat from known sources, and altruistic, I like the farmers I deal with and want to support local agriculture. Please rethink your rules and regulations as per their impact on those small local processors and producers who add vibrancy to rural communities and good food to local tables. Even USDA has been active in getting the word out about local foods and their many benefits. Why would you work at cross purposes? While you are at it, maybe you could revisit those regulations that make it impossible for me to buy fresh (unfrozen) meat from my farmer friends. I really don't want to be a complete vegetarian, but it looks like you are making that my only choice.

Margie Richards
4046 Salem Ave.
ST Louis Park, MN
952-928-0462

May 17, 2010

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

Re: Comments – Draft Guidance on HACCP System Validation

Dear Mr. Almanza:

Our family and farm has been a customer of our local meat processing plants for 40 years. These plants have all been most professional and safe for the meat we have had processed there and purchased there.

Please do not impose requirements on these small, safe, family owned processing plants that will ultimately put them out of business. If there is a problem in the industry address the people/places that have caused the safety issues. When you think of the millions of pounds of product that is processed in this country and the overwhelming safety history that we have here it is really ludicrous to add more regulation to hundreds of thousands of people who rely on this industry for a real and safe food source.

These excessive regulations will affect not only the small processing plants but the local farmers and consumers of their products in an extremely negative way. We love the ability to buy locally processed meat and the ability to raise our own meat for processing.

Please reevaluate your premise with this mandate. Nothing good can come from imposing additional regulations when stricter enforcement of the rules already in place would be sufficient.

Thank you for your time.

Sincerely,



Joan Meyer/Legacy Farms
Witt, IL 62094



RECEIVED
APR 30 2010

Dear: Mr. Vilsack
U.S. Department of Agriculture

My name is Phil Barber. I am a hard working, small business owner pleading for your help. My company has been in business over fifty years and currently employs twenty people.

I have recently received word that our 1997 HACCP Plan's long-accepted validation documents, Appendix A, Compliance Guidelines for Meeting Performance Standards for Certain Meat and Poultry Products, will no longer be adequate, due to FSIS reinterpreting the regulation.

I am at a loss for words. I have done everything asked of me and followed all rules and regulations. My daughter (who is a co-owner) and I worked very hard at developing our HACCP Plan and invested a great deal of time and energy, in order to implement the USDA/FSIS (food safety) regulations.

It's always been our top priority to provide safe, high quality meat for our customers. For the last ten years we've followed our plan exactly as written. We are able to provide the up to the minute documentation required to validate our plan. We have Iowa State Inspectors on-site every day, monitoring and reviewing our documents as well as periodic FSIS audit reviews. We've always passed our reviews, never had a re-call and can provide valid documentation of all findings.

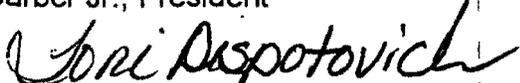
Why is there a need for further validation? The costs associated with the new required validation testing are crushing and not economically possible for us. **FSIS interpretation of the validation guidelines is enforced, it could cause my business of 53 years and many others throughout the nation to cut back or ultimately close.**

I and other small business owners are begging for your help. Please help us fight this onerous and unnecessary government regulation before it's too late and we are regulated out of business.

Thank you in advance, for your time and efforts.

Sincerely,


Phil Barber Jr., President


Toni Despotovich, Vice President