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To: FSIS Petitions - FSIS
Subject: [External Email]poultry exemptions
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To Whom It May Concern:

I am writing to petition a change in the Guidance for Determining Whether a Poultry Slaughter or Processing Operation is Exempt from Inspection Requirements of the Poultry Products Inspection Act, dated April 2006.

The document states that a facility may only operate under one exemption in a calendar year. I would propose that small and very small establishments be able to operate under the following exemptions simultaneously as long as operations were conducted using sanitary methods, and that it provided time and space between inspected and various exempted operations:

Custom Exempt
Small Enterprise Exemption
Retail Exemption

Background: Our facility is a very small operation that is Federally inspected for Cattle, Pigs, Goats, and Sheep (#2442). We would like to purchase locally raised poultry to process and sell through our facility, as well as provide the service for small local producers who raise poultry for themselves. We have had numerous requests for both things, but according to this document, we are only permitted to conduct one of them at our facility in the same calendar year.

I think this would be a benefit for not only our business, but also other similar businesses and small operations as an added revenue stream to help increase financial sustainability. This would also benefit local consumers who would like to raise their own poultry, but lack the infrastructure, financial means or technical ability to perform the processing themselves. Conducting these operations for the consumer at our facility would provide a more sanitary operation that could be completed without negatively affecting the other operations that we perform. Maintaining sanitation by separating processes using space and time would be no different than how we currently conduct inspected, retail, and custom exempt activities.

Maintaining separation of each of these exemptions would also be a simple solution through scheduling activities in the order of Retail Exempt, then Small Enterprise Exempt, followed by Custom Exempt, when necessary.

If all three of these cannot be performed by the same facility in the same calendar year, I would propose that, at a minimum, the Small Enterprise Exemption and the Custom Exemption be allowable simultaneously.

Please contact me directly if you have any additional questions or follow up information.

Thank you,
Benjamin Michael,
Owner, The Russell County Butchery, LLC