

## Rhodes, Suzette

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**From:** Gerald Boullion [GeraldB@savoiesfoods.com]  
**Sent:** Wednesday, March 31, 2010 12:22 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Validation proposal

To Whom it may concern,

I am a plant Manager of a sausage and food product facility the USDA is considering that companies validate their CCP's and HACCP plan in house and show that their plan is working. That's fine, but how do you propose we do that when in order to show a 7-log reduction in a particular pathogen that is being targeted you would have to inoculate the product with the pathogen and then do the step in order to see if indeed the 7-log reduction actually happened in your facility. We have been doing testing on the contact surfaces for years and discourage contaminating product in any shape or form to ensure the product is wholesome when leaving our facility. The interventions used at this and other plants are from studies that have been done at various labs and institutions of learning and have been proven all ready to reduce the pathogen. Most facilities that sell smoked sausages use Appendix A and B which for heating lethality and cooling stabilization which is directly from the USDA-FSIS compliance guidelines. In other words USDA wants us, as an industry to prove that what the USDA is saying is a safe procedure that has been proven all ready should be be validated. If this validation issue passes I can't help but believe that it will be the beginning of the end for all Medium to small facilities that process food for the public. We are not trying to shirk our obligations to put out a safe and wholesome product because as processors if we don't we would be putting ourselves out of business not to mention getting **our** and **other** peoples families sick. It seems that industry is being held liable for everything that happens and the public which in a lot of cases are the ones mishandling the product are getting Carte Blanche' to just pass the blame somewhere else. The industry has been doing everything asked of it for years and there seem no end to it.

## Rhodes, Suzette

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**From:** joshyar@mandafinemeats.com  
**Sent:** Monday, March 29, 2010 4:56 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Message from Internet User - HACCP Systems Validation

Dear Mr. Almanza

After reviewing the Draft Guidance: HACCP Systems Validation I am left with several concerns for our company and the future of small and very small plants. Our company has been producing ready to eat products under HACCP for almost a decade. During this time we have followed Appendix A and B and they have been our only Critical Control Points. These documents have been validated and used in plants of all sizes since the beginning of HACCP. We have never had any finished product samples come back positive. Now after all this time we find that the agency decided these documents are no longer acceptable unless we do microbiological testing in our plant to show what everyone already knows, that Appendix A and B work. Furthermore, scientific literature such as Dr. Tompkins Minimum Growth Temperatures for Selected Foodborne Pathogens has been used in our plant and Im sure many others at cold holding steps to prevent the outgrowth of pathogens from being a hazard that is reasonably likely to occur. Now, this scientific study, produced by Ph.D.s is going to have to be redone by small and very small plants. It seems to me that the agency is taking established materials that have been used effectively for several years and dismissing them as inadequate for some reason. Any recent recalls have not been due to Appendix A or B not working in any specific plant. They are due to the plant not meeting the operational parameters. We believe this new way of viewing the regulations will cost plants a lot of unnecessary time and money that would be better spent on ensuring we meet the operational parameters of the guidelines that have been used effectively for a decade.

Respectfully Submitted,  
Josh Yarborough  
Director of Food Safety and Quality Assurance  
Manda Packing Company

## White, Ralene

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**From:** Krista Carlson [kristamcarlson@yahoo.com]  
**Sent:** Wednesday, May 26, 2010 2:51 PM  
**To:** Draft Validation Guide Comments  
**Subject:** HACCP

I recently read an article about HACCP. My diet is based primarily around pastured meat from small, local farms. I purchase most of my meat at the farmers market, and occasionally supplement with grass fed meats from Whole Foods. I am concerned that the new proposed regulations will shut down the processors who help to supply me with my main source of protein.

I truly believe that local meat from animals raised on pasture is different from the meat grown in industrial feed lots, and different processing regulations should govern the meat from pastured animals. The pastured animals do not become sick in the same ways the industrial animals do, as they are not fed the same diet or kept in the same conditions.

Please reconsider passing this bill, as it will make obtaining good quality meat even more expensive than it currently is, and will harm those of us who are doing our best to be healthy!

Yours,  
Krista Carlson  
[kristamcarlson@yahoo.com](mailto:kristamcarlson@yahoo.com)  
310-968-0003

## Rhodes, Suzette

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**From:** Maureen Milton [alnmo@gorge.net]  
**Sent:** Tuesday, May 25, 2010 3:01 AM  
**To:** Draft Validation Guide Comments  
**Cc:** lauren.gwin@oregonstate.edu.  
**Subject:** Concerns about 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.

I am the great-granddaughter of a New York City butcher. Nearly every year of my childhood in rural New Jersey, my father bought a 4-H cow at the fair (which was slaughtered locally) for our consumption during the following year. As an adult and parent, I have been careful only to purchase, feed my family, and consume for myself meat which has been locally pastured and raised. I know personally and can name among my friends the people who raise the food which I and my family do not raise ourselves, most importantly, the beef, lamb, pork, poultry and eggs raised and processed locally by small operations.

In my opinion, the USDA needs to recognize that "one size fits all" inspection no longer fits current industry practice and consumer demand.

It is because I am serious about food safety that I only purchase from small, local processors, and we need to keep local infrastructure alive in this country. We need an inspection system that recognizes that the small plants do not put either the food economy or millions of people at risk.

Large trucks are required to have two or three brake systems, double or triple rear view mirrors, backup "beeps", and many other safety features to protect the public at large. Bicycles are still allowed on the same roads with these trucks, but bicycles do not require the same safety systems because they lack the same potential to cause widespread harm. Small processors in America need a "bicycle lane" safety systems requirement. Generally these are categorically called "small processor exemptions," and they're a great way to handle a very different kind of risk.

Please do not jeopardize the health of local eaters and farmers by imposing measures meant, rightfully, to protect consumers from the challenges presented by vast CAFOs, whose strict regulation I strongly support. I know, believe in and trust my local meat processors; therefore, I respectfully request 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.

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

Most sincerely,

Maureen Milton  
Parent, Voter, Careful Carnivore

## Rhodes, Suzette

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**From:** Jodi Friedlander [jfriedlander05@yahoo.com]  
**Sent:** Sunday, May 16, 2010 9:37 AM  
**To:** Draft Validation Guide Comments  
**Subject:** locally produced meat

To Whom it May Concern,

I am deeply disturbed by new regulations coming down the pike concerning requirements for small meat processing plants to increase their levels of surveillance for pathogens. To be very clear, I am not referring to large plants where thousands of animals from who knows how many growers are processed daily, but those who process only several animals daily and have never had problems of any sort with contamination of their products. While you write about promoting local food production, this type of action is the very thing that will reduce this type of healthful and sustainable food production.

I personally NEVER purchase beef that has been grown anywhere but locally, and I intend to keep it that way. This beef has been pastured, raised in small numbers, production of which is good for the land. It is grown 10 miles from my house, processed within 50 miles. This is good for the rancher, good for those of us in the community who want to "know our farmer, know our food" and want to know the provenance of our cows. It is also the only sustainable way to produce beef.

Pathogenic bacteria are only a problem from cattle raised in torturous feed-lot conditions, fed the wrong foods, fed items that should never even be considered food, cattle that spend their feedlot days standing in their own excrement, which is what produces these large numbers of pathogens. Pathogenic bacteria become more of a problem under the sped-up production practices of modern slaughterhouses, a practice that is also dangerous to the workers who toil under these inhumane practices.

Yes, it certainly is time for an overhaul of slaughterhouse conditions; in fact, it's time for a complete overhaul of the industrial factory-farming paradigm towards one that is truly concerned about consumer health and not about corporate profit.

If anyone at the USDA is truly listening to consumers (which I doubt), please understand that many of us are completely aware that the agricultural practices you condone and sanction are beyond unfair; they endanger our food supply and our food producers. Hopefully, as with marijuana producers, an increase in unreasonable legislation will produce an underground economy that will allow small-time producers to flourish. Who cares if it's illegal? We want our local, pastured, clean meat!

With all due respect,

*Jodi Friedlander, MS, NC*  
*Board Certified in Holistic Nutrition*

## Rhodes, Suzette

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**From:** Jeremy Dreyer [papino@msn.com]  
**Sent:** Wednesday, May 19, 2010 11:58 AM  
**To:** Draft Validation Guide Comments  
**Subject:** Comments HACCP System Validation

FSIS, USDA  
Dear Mr Almanza,

We refer to the draft guidance on HACCP validation of March 19, 2010 and wish to comment as follows:

We are an exceptionally small processing plant with a processing staff of 3 and have been in business for the past 6 years.

We estimate that on the basis of your recommendation that a small plant would need to collect and test 13 samples at entry and exit points for each HACCP plan that this would cost us about \$8,568.00 in lab testing fees, (Please compare this amount in relationship to our total monthly production of meat products which is approximately \$28,000)

Furthermore the time required to implement these 13 sample tests on a continuous basis from start to finish on certain of our products would take at least 105 days at best (You suggest a time frame of 90 days)

We would also point out that our existing plant history shows that we have never had a negative result from our regular quarterly lab testing or at any stage of processing our products since our inception and we therefore consider this plant history to be a physical validation of our HACCP plan and cannot comprehend the need to create additional costs to an existing and proven safe process.

We would ask that you kindly re-consider these stringent requirements for very small plants with existing and proven HACCP plans due to the severe financial burden this would place on a very small business structure such as ours.

Sincerely

Jeremy Dreyer  
AA Biltong (EST 32046  
11229 E. Independence Blvd.  
Matthews, NC 28105

## Rhodes, Suzette

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**From:** DLKJRICE [dlkjrice@peoplepc.com]  
**Sent:** Thursday, May 20, 2010 11:48 AM  
**To:** Draft Validation Guide Comments  
**Subject:** HACCP program changes

You really need to do an analysis of what good this new regulation will do overall compared to the cost to the consumer and small business.  
Obviously the economy is bad, and small towns need their meat lockers, and we need the small business owners for tax reasons as well as pure survival of business.  
What is the overall percentage of improvement or risk reduction that will be returned by this legislation?  
What will the overall impact be to consumers?  
Are we talking such a minute percentage of improvement that it will never be realized by the average consumer?  
Do the benefits truly outweigh the cost?  
Is this legislation a knee jerk reaction to an extremely limited event?  
Once again, you are imposing regulations that increase cost; ruin peoples lives that have been in the business for generations; hurt the consumer and producer in rural america; and impose regulations that require major expense without offering a plan to pay for it other than jacking prices up out of reach to the average American.  
Prove that this regulation change is needed, and than tell us about it and let us comment on it. Prove that you are doing something for the good of all and not just to justify your employment!  
Thank you  
Dave Rice

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## Rhodes, Suzette

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**From:** Elaine Maltsberger [nvan@gvtc.com]  
**Sent:** Monday, May 24, 2010 1:08 PM  
**To:** Draft Validation Guide Comments  
**Subject:** meat processors - the small ones

In the Texas town where we live, I've been searching for several years for a reliable source of organically raised, free-range meats. A local farmer has helped to supply our family, and recently a small farmers market has shown up in town, offering a couple of alternatives.

We don't make a lot of money - in fact, paying bills is a struggle. But we feel that when we buy meat from animals who've been improperly treated, or who contain growth hormones, etc. that we're casting a vote for the kind of planet we don't want to live in. So we've made the decision to seek out sources of the kind of food that represents our philosophy of responsibility.

Now the USDA, with, albeit good intentions, is putting pressure on the small meat processing business that is just beginning to find a foothold among consumers...please don't make a decision that will take this option away from a group of people who're seeking a healthy and good alternative.

Appreciatively,  
Elaine Maltsberger

## Rhodes, Suzette

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**From:** Jefferies, John [jjefferies@nifa.usda.gov]  
**Sent:** Tuesday, March 23, 2010 6:38 AM  
**To:** Draft Validation Guide Comments  
**Subject:** Unintended Consequences

It make no sense to anyone in the United States to implement a system of overarching one size fits all Federal controls without considering the economic and social impact first.

For example, the Federal government took action to protect fisheries in the past, but the regulations proved too stringent for small fishermen, and put most out of business. However, the market for fishery products was still alive and well, so foreign production stepped up to meet market demands. Today fish biologists have concluded that excessive and ill conceived Federal controls designed to protect fisheries actually caused far more damage than good. Foreign fisherman have absolutely no rules to live by.

Far, far better for USDA to work more closely with existing State systems to find workable solutions. The Federal government should NEVER put anyone out of business who has done no wrong. There have been small food processors making smoked sausage and other meat products for over 100 years without creating any huge health problems. Somebody over there at FSIS needs to fall out of love with their "big idea" and go back to the drawing board.

jj

**John Jefferies**  
Policy Specialist  
U.S. Department of Agriculture (USDA)  
National Institute of Food and Agriculture (NIFA)  
OEP/Policy and Oversight Section: Stop 2272  
1400 Independence Avenue, SW  
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**Shipping and Overnight Deliveries:**  
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Washington, DC 20024

*Farming looks mighty easy when your plow is a pencil, and you're a thousand miles from the corn field.*  
Dwight Eisenhower, 1956



Do you really need to print this e-mail?

**White, Ralene**

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**From:** Martin Primus [freshairfarm@clearwire.net]  
**Sent:** Wednesday, May 05, 2010 1:57 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Fwd: meat testing requirements

----- Forwarded message -----

**From:** **Martin Primus** <[freshairfarm@clearwire.net](mailto:freshairfarm@clearwire.net)>  
**Date:** Wed, May 5, 2010 at 11:53 AM  
**Subject:** meat testing requirements  
**To:** [DraftValidationGuidComments@fsis.usda.gov](mailto:DraftValidationGuidComments@fsis.usda.gov)

Dear Sirs,

Please note that the meat recalls that have brought about the proposed new testing and regulations were caused by one of the 4 big packing plants (business) which already control most of our meat supply. The proposed new testing and regulations are all fine and dandy if applied to where the hurt contamination's accurate, the big meat packing plants that need not worry about what an individual will think or do. These big meat packing plants worry about volume. The pressure is always on to lower cost and increase volume. These are the businesses need to be regulated. But by applying the same rules and regulation across the broad spectrum of the meat packing industry will only serve to even more concentrate the meat packing business into the hands of fewer and fewer players making the risk of a major contamination event ever more likely and ever more deadly. The artisan butcher would be soon put out of business if he is made to follow the same rules. The artisan butcher is already liable to his customers for without them he would have no business. If he makes a few people sick or worse kills a few by shoddy workmanship he would be out of business pronto. This does not happen to the big packers therefore making the regulations and testing being proposed a much needed safety net for the general consumer when the general consumer has to buy products produced by the big packers. I know if my butcher does not do a good job and leaves my customers unhappy I will not go back to him and he knows it.

Please when proposing new testing and regulations know that one size does not fit all. Work at keeping us all safe while insuring a good economic environment for the entrepreneur. It is the entrepreneurial spirit that made this country great and this spirit needs to be fanned and not dampened as the new proposed testing and regulations as proposed would do.

Sincerely yours,

Martin Primus  
Primus Fresh Air Farm  
Sauk Centre, MN

## Rhodes, Suzette

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**From:** Kevin and Lisa Engelbert [kengelbert@stny.rr.com]  
**Sent:** Wednesday, April 14, 2010 12:17 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Proposed HACCP regulations

To Whom It May Concern:

My family owns and operates a certified organic farm in Nichols, NY. We sell organic beef and pork directly to consumers, as well as into several natural food stores in our area. Our meat is processed at a USDA inspected slaughterhouse that is also certified to process organic meat. The proposed regulations that will require even small slaughterhouses to conduct in-house testing will adversely affect our farm and many others like ours. Small-scale producers and slaughterhouses should not be lumped together with large, corporate owned operations. There is a huge difference in how they operate.

Organic producers are required to be able to trace each piece of meat back to the day the animal(s) was born. Slaughterhouses that are certified to process organic meat are required (under USDA organic regulations) to do the same. The traceability of organic products is already in place.

Please do not place these cumbersome regulations on small-scale operations that are raising animals and processing them responsibly. It isn't fair to the slaughterhouses, the farmers or consumers. If these new regulations go into effect, the price of organic and sustainably-raised meat will have to be raised to such a level that consumers will not be able to afford to support their local farms.

Organic and sustainable agriculture is one sector of US agriculture that continues to grow. Please do not impose unnecessary and unfair regulations that will impede this growth.

If you would like to discuss this further, please do not hesitate to contact me.

Lisa Engelbert  
Engelbert Farms  
Nichols, NY  
[kengelbert@stny.rr.com](mailto:kengelbert@stny.rr.com)

## White, Ralene

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**From:** Howard Moechnig [mwgrasslands@frontiernet.net]  
**Sent:** Thursday, April 29, 2010 2:32 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Comments re: New Rules for Small Food Processors

I am sending this message to let you know of my concerns regarding the FSIS plans to increase meat testing regulations on small meat processors. I am a small farmer and a grazing lands consultant to many other small farmers.

I question the need for increased regulations on small meat processors. I cannot recall ever hearing of an issue of sickness or death to consumers eating meat from small meat processors. I can, however, recall several issues (including recalls of meat) with meats from large meat processors. Some of these issues do include sickness and death to consumers. These new regulations that are proposed are not based upon actual evidence and are completely unnecessary.

The proposed regulations will do great financial damage to the small meat processors around the country, and will likely put the majority of them out of business by raising the cost of business considerably. The other option they have is to raise the price of their services to the point that nobody will use their services. The end result is the same.

But it even goes beyond that. Many of the small farmer clients of mine will also go out of business because their customer base will not be able to afford the cost of processing livestock for sale to local customers.

These proposed regulations will severely affect (negatively) the local and regional foods businesses that are beginning to thrive as consumers are turning away from the traditional (and documented to be dangerous) large scale food processors and their products. This change by consumers to local food sources is a direct result of their deciding to opt for safer foods.

These regulations have no basis in need and will be very detrimental to small food processing businesses and small farmers across the country. I encourage you to scrap these plans, leaving the current system in place.

Thank you for the opportunity to comment.

*Howard Moechnig*  
Midwest Grasslands  
37484 90th Ave  
Cannon Falls, MN 55009  
(507)-263-3149