

**Rhodes, Suzette**

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**From:** Brett Walton [bw@midwesternresearch.com]  
**Sent:** Friday, April 02, 2010 5:46 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Comments - Draft Guidance on HACCP System Validation  
**Attachments:** Validation support 3.2010.docx; image001.jpg

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

Email: [DraftValidationGuideComments@fsis.usda.gov](mailto:DraftValidationGuideComments@fsis.usda.gov)

**Re: Comments - Draft Guidance on HACCP System Validation**

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Dear Mr. Almanza:

Mid-Western Research & Supply, Inc. respectfully submits these comments regarding the Draft Guidance on HACCP System Validation that were publically released on March 19, 2010.

It has come to our attention that you are currently considering changing the enforcement of the HACCP system validation. I am unsure of the reasons for this change since our industry has safely operated under the current system for over 10 years. I believe the current system has produced a safe meat supply when following the current HACCP plans. These plans use the FSIS standards, FSIS Federal Register documents and peer reviewed studies to maintain reliable processes.

We currently supply several thousand small meat processors across the United States. We daily ship supplies and equipment to these processors they use to produce high quality meat products. These products are then consumed by their own families, communities and satisfied consumers across the country.

We as well as the other businesses that supply the small meat processors employ many workers who could be affected by this increase in the cost of complying with the change in enforcement. I have personally discussed this change with many processors who believe the new validation requirements would drastically alter their businesses. Most would be forced to significantly reduce the number of products they produce and the number of employees needed to produce them. Obviously this would have a large impact on our business since a reduction in products would require fewer supplies and fewer purchases of new equipment.

We respectfully request that the Draft Guidance on HACCP System Validation be revised to clearly state that no in-plant microbial testing is required when an establishment is following the long-standing,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.

Mid-Western Research & Supply, Inc. appreciates the chance to comment on the Draft Guidance on HACCP System Validation. Thank you for your time and consideration,

Brett A. Walton  
President & CEO

cc: Senator Sam Brownback  
Senator Pat Roberts  
Congressman Todd Tiahrt  
Congressman Jerry Moran

Riley, Mary

**From:** Lyn Stowers -Chalet Market [lyn@chaletmarket.com]  
**Sent:** Monday, April 26, 2010 4:02 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Comments - Draft Guidance: HACCP Systems Validation

**MONTANA MEAT PROCESSORS ASSOCIATION**

4700 Gooch Hill Rd.  
Bozeman, MT 59718  
E-mail: [hapccm@imt.net](mailto:hapccm@imt.net)

April 26, 2010

VIA EMAIL  
DraftValidationGuideComments@fsis.usda.gov

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

Subject: Comments – Draft Guidance: HACCP Systems Validation

Dear Mr. Almanza:

The Montana Meat Processors Association (MMPA) respectfully submits these comments on the “Draft Guidance: HACCP SYSTEMS VALIDATION” that was released to the public on March 19, 2010.

MMPA member plants have discussed the document and wish to briefly comment on the following issues:

1. Is there a problem with the HACCP system that would require additional validation at this time?
2. Will food safety be enhanced by further validation of processes that have already been validated by professionally trained meat scientists, professors, and statisticians? How much money has USDA spent in the last 14 years on just such studies? How much money has the industry spent?
3. Based on the Draft Guidance, we perceive that microbiological testing will be critical in meeting the proposed requirements. The suggestions for numbers of tests – both before and after HACCP interventions – is financially significant for even a very small plant with few processed products. One estimate is \$12,000 for every RTE product with an ongoing annual expense of \$3000 to maintain the validation.

4/28/2010

4. Guidance given in the document for selecting which products within a HACCP category would need to be validated is vague and could lead one to assume that all products because of varying ingredients, etc. might need to be included.
5. Among MMPA members there are no plant operators with the educational background to design scientifically and statistically valid validation programs. Are there many in the country? Who do we rely on? Do we rely on "processing authorities"?
6. If this Draft Guidance is accepted as is, our plants will have to re-evaluate their entire business models. The addition of thousands of dollars of testing, which small companies cannot pass on to the consumer in this economy, or ever, as small processors have higher per unit costs than the large processors, will result in the closing of many plants. In rural areas, like Montana, this will hinder the "buy local" programs; such as the USDA's "Know your Farmer, Know your Products" program, niche marketing of select livestock, and put people out of work in an economy that has too few jobs already.

Just 18 member plants of the MMPA in 2009 provided over 141 jobs and over \$3.3 million in payroll. These 18 plants represent less than half of MMPA membership, but, more importantly represent only 8% of licensed meat plants in the state of Montana.

The Montana Meat Processors Association has one suggestion that might alter the need for so much "re-validation" of processes that are already known to work allow for implementation of regulations based on volume of product produced each year. By FSIS admission, the largest plants constitute 7% of all federally inspected plants, but account for 90% of our meat. Does the Draft Guidance: HACCP Systems Validation, as written, make any sense for the 93% of the federally inspected plants that produce only 10% of the meat supply? And what percent of the volume of recalled meat in the last 3 years has come from small and very small plants?

Thank you for your consideration.

Respectfully,

*Wes Plummer*

Wes Plummer (plumbob\_4@yahoo.com)  
 President of Montana Meat Processors  
 Owner, Lower Valley Processing  
 Kalispell, Montana

cc: Brian Schweitzer, Governor, State of Montana  
 Max Baucus, U. S. Senator  
 John Tester, U. S. Senator  
 Denny Rehberg, U. S. House of Representatives  
 Ron de Yong, Director Montana Dept. of Agriculture  
 Christian Mac Kay, Executive Officer, Montana Department of Livestock  
 Michelle Johnson, District Director, Small Business Administration  
 Jake Cummins, Executive Vice President, Montana Farm Bureau  
 Charlene Rich, Executive Director, Montana Beef Council  
 Anne Miller, Executive Director, Montana Pork Producers Council  
 R. M. Thornberry, DVM, President R-CALF USA Board of Directors

4/28/2010

**Riley, Mary**

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**From:** Daniela Kunz [dany@kunz-fam.com]  
**Sent:** Tuesday, April 27, 2010 11:19 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Local Meat/Small Family Farms and Testing procedure bill

Food safety is much in the news, and rightly so. As the nation has moved from small farms producing meat for their local community to larger and larger processors, food safety has suffered. According to Food, Inc., in 1970 the top 5 beef packers controlled about 25% of the market. Now, the top 4 packers control more than 80% of the market. Every time there has been a massive recall of tainted meat, the meat has come from huge producers and processors, not small, local facilities.

A pending regulation threatens to push even more meat in to the industrial food system by forcing smaller, local processors out of business. FSIS (Food Safety and Inspection Service, part of the USDA) has revised their guidelines to require "micro testing," a new and expensive method that attempts to prove that the safety measures of a meat processing facility are effective. Unfortunately, this micro testing has not been shown to improve food safety.

The system in place since 1996 requires that the HACCP plan (Hazard Analysis and Critical Control Points) actually works in each specific establishment. Old, tried and true methods of providing a safe environment for processing have not required these micro tests. Only new processes not established and proven have required them. This process has worked well for the last decade, especially for small processors who rely on the safe processing methods that have been in use for a long time.

Requiring micro testing data of every step of every process within every establishment, even those using proven methods of safety validation, places too heavy a burden on smaller processors providing local, safe food. How much of a burden? The initial costs for the micro tests will cost \$455,592, followed by an annual ongoing series of tests tallying \$140,182.

The revised rules for a small plant like his would require 13 samples of every product to be sent for testing before processing, and another 13 samples after processing. "When you add all those products and tests, it racks up a super amount of money. Right now we're sitting at about \$500,000 for the initial validation tests, just for the first year. We wouldn't be able to do it. It would just really devastate our business."

There is no evidence that micro validation will result in any improvement to the system of food safety protocols already in place. Because of the tremendous expense involved, these new guidelines will drive smaller processors out of business, putting more meat in the hands of fewer processors—something we already know has a negative effect on food safety. Dustin VandeHoer of the Iowa Department of Agriculture and Land Stewardship agrees. "We haven't had problems with food safety, especially with the smaller plants," he says. "We should never become complacent, but I think we can reach a point where [small meat processors] can still be allowed to operate and food can be safe. I don't know that we need to be taking this path that's going to put small plants out of business."

These new guidelines could spell the end of locally produced, small-batch processed meats. To those of us seeking the freshest, safest food, these new guidelines could mean we no longer can choose to opt out of the industrial food system. To local farmers, they could represent the loss of livelihood.

4/28/2010

I demand the freedom of choice to have fresh and local meats available from small family farms in my area and that their livelihood and our wholesome and genuine food supply will not be taken away. I ask you to not pass that regulation and to protect and exempt small family farms from such procedures. We the people want the freedom to live life healthy and happy - which won't be the case if we cannot have wholesome and genuine food, of which origin and upbringing we thoroughly know and agree on. Our family switched to meat coming from small family farms for a reason = our health and life depends on it!

Best regards,

Daniela Kunz

4/28/2010

**Riley, Mary**

**From:** Jake Manchester [JAKEMANCHESTER@YAHOO.COM]  
**Sent:** Tuesday, April 27, 2010 11:35 AM  
**To:** Draft Validation Guide Comments  
**Subject:** Re: Comments - Draft Guidance on HACCP System Validation

**Attachments:** Letter to USDA-FSIS from Jacob Manchester.pdf



Letter to  
DA-FSIS from Jacot  
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:

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

Food safety is a top priority for my family and I. We are convinced that one of the **best** ways to maintain and achieve even greater food safety in our home and community is to **keep** the production system as close to home as possible.

We produce as much of our food as we can in our home garden, and what we can't produce ourselves we buy locally from farmers that we've come to know by name. We count on **these** farmers to provide us with safe, nutritious food for our dinner table, especially **meat** products. These farmers, in turn, rely on our local meat processors to create **marketable** products from their livestock.

I have grave concerns that the proposed validation initiative may create a financial burden that is tantamount to a market barrier for our local processors. I fear that **this** initiative will force these businesses to close their doors, eliminating desperately needed jobs in our community.

The negative effects of these processors closing would be compounded by the lost capability of our farmers to market their products directly to local consumers. It **seems** inevitable that this lost capability will be another, perhaps final, nail in the **coffin** of our family farms. Our farmers are producing premium products that command **premium prices**, and we are happy to pay the premium for the safe, nutritious food they produce. **Please do** not adopt policy (like this initiative) that will eliminate this option for us.

The established HACCP food safety systems currently provide well-recognized, long-standing processes and supporting documents which, when followed, result in the production of **safe** meat products. The processors and farmers are members of our community. They make a living by selling their products directly to their friends, neighbors, and the **greater** community. This creates a very strong incentive for them to ensure that they are selling the safest products in the market, and I believe that their safety record speaks for itself.

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. We appreciate the chance to **comment** on the Draft Guidance on HACCP System Validation. I encourage you to adopt language that

will increase oversight of large-scale operations. Thank you for your time and consideration.

Sincerely,

Jacob A Manchester

cc: Representative Bart Stupak, Senator Carl Levin, Senator Debbie Stabenow U.S. Small Business Administration Michigan Farm Bureau

Riley, Mary

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**From:** Stephanie Goodrich [stephgoodrich@gmail.com]  
**Sent:** Friday, April 23, 2010 11:53 AM  
**To:** Draft Validation Guide Comments  
**Cc:** The Colemans  
**Subject:** In support of small, local farms

Dear Secretary Vilsack,

I represent one of the families that Ben Coleman is talking about in his email below. I depend on the Coleman family farm for my beef, pork, and poultry, and believe the proposed legislation regarding the new meat testing regulations for small food processors would ultimately be detrimental to the Coleman farm as producers, and to my family, as consumers. Because the Coleman farm deals directly with a small number of families, there is a sense of trust that their meat products are safe and healthy. Moreover, I feel completely comfortable assuming personal responsibility for the very small risk of contamination. I feel that this is my choice to make as a consumer. If I want rigorously tested meat products, I can shop at one of the grocery stores in town. However, it should be acknowledged that the rigorous and expensive testing that the USDA requires for larger meat producers regularly fails to keep contaminated meat out of grocery stores. A quick search of recent news stories is replete with instances of salmonella and E. coli contaminated meat being recalled from grocery stores. The consumer's ability to choose and assume certain risks are what contribute to a diversified and responsive economy. It is my understanding that the proposed legislation will reduce my ability to choose to buy from local producers because the cost of testing will force small meat processors to reduce the products they offer, increase their prices, or even shut down.

Reducing the number of products that local farms produce, or worse, the number of local farms producing local, healthy foods is the OPPOSITE direction our country needs to move in when it comes to food production. Health concerns like salmonella were rare when my grandfather was a boy. It wasn't until food production became industrialized and animals were raised at abnormally and unsustainably high densities that food-borne pathogens became a frequent threat to our food supply. Small, local producers like the Coleman Farm raise their animals at healthy densities, and their animals forage on pasture. As a consumer, I feel much more comfortable eating poultry from the Coleman farm than I would from Tysons Inc. because I know the animals were raised in a healthy environment. I fail to see a demonstrated need that meat products from small farms requires rigorous testing to be as safe as those products coming from industrialized operations. On the contrary, the vast majority of contaminated meat products appear to come from large producers. Yet, I can easily see how this proposed legislation will put small farms out of business, and force consumers to buy meat from large industrial farms.

There is a substantial movement afoot in this country to support local, sustainable harvests. Films like Food Inc and popular authors like Michael Pollan and Barbara Kingsolver are raising the level of awareness about healthy foods and the benefits of eating locally. First Lady Michelle Obama has consistently been a vocal supporter the movement toward increasing the consumption of local, fresh foods, as her garden at the White House demonstrates. Imposing costly and unnecessary regulation on the farms and producers that are the avant guard for this movement will negatively affect farms and families, which is to say the VOTERS. Please consider revising the proposed legislation. I urge you to listen to the small farmers and the families that support them.

4/28/2010

Sincerely,

Stephanie H. Goodrich  
7671 Big Island Hwy.  
Bedford, Virginia 24523

Email from Ben Coleman:

*My name is Ben Coleman. I am a fulltime farmer and food producer in central Virginia. I am 36 years old. I am building a successful Farm operation which sells Our home-raised meats directly to the consumer from the farm. Our farm has an "open gate" policy that allows ALL customers to inspect our farm ANY time. This relationship builds trust and safety. Our farm is a power house in the Local food system of Bedford County, VA. We have ten years of experience selling to about 300 families in VA. These families are dependent on us. They are passionate and ready to fight for their food rights. I am writing to WARN the politicians. If our community is pressured by any more regulation (regulation is already out of touch with reality and is keeping our business in "survival" mode) there WILL BE on onslaught of angry families who vote to protect their food and their farmer (ME!). Please heed the warnings that hard working American Farmers are expressing. I invite anyone interested to visit our farm on the web at [mountainrunfarm.com](http://mountainrunfarm.com) OR in person. I believe we have some answers to creating FOOD SAFETY and security of the American Food Producers. The safest food in American history came from the backyards and family farms of the Founding Fathers. These were the days BEFORE any diseases or need for Government Regulation. We are reaching that same level of food safety on Mountain Run Farm in Sedalia, VA. Thank you for Supporting, not hindering, REAL family farms,*

*Ben Coleman*

4/28/2010

**Rhodes, Suzette**

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**From:** Pamela Hopper [lotolee805@hotmail.com]  
**Sent:** Wednesday, April 07, 2010 10:17 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Comments - Draft Guidance on HACCP System Validation

Dear Mr. Almanza:

On behalf of all of us here at Paris Frozen Foods, Inc., I respectfully submit these comments regarding the Draft Guidance on HACCP System Validation that were publically released on March 19, 2010.

Food safety has been a top priority for us not only since the implementation of HACCP, but long before it was implemented. The overall purpose of HACCP was prevention of harmful pathogens that could potentially be associated with meat products. It seems as though the Agency is continually reverting to excessive end-product microbiological testing of meat products to control pathogens instead of relying on the established HACCP food safety systems. HACCP is controlling the process rather than attempting to test safety into the system. There are several well-recognized, long-standing processes and supporting documents which, when followed, result in the production of safe meat products.

The microbiological testing that may be potentially required by this validation initiative would be extremely costly to our business and a huge financial burden. No in-plant microbial data should be required to validate our processes and food safety systems utilized. No establishment, especially small and very small ones such as ours, should be forced to expend thousands of dollars to validate what has been so widely accepted over the years.

Paris Frozen Foods is located in Montgomery County, Illinois and employs four full-time and four part-time employees. Montgomery County is in the top five counties in our state for unemployment and in the top ten for poverty levels. With this in mind, we work hard to keep our products affordable even if it means a smaller profit margin for us. This initiative by FSIS, however, could endanger our survival. Paris Frozen Foods does not have an in-house accredited lab. All of the required testing we now do, and any future testing we may be required to do, would have to go to an outside lab. This would result in excessive expense to us. **We must also do all of this testing while local grocery stores, who grind their own hamburger and sausage for wholesale and retail sales, are exempt from such regulations, and have been for years.**

We have always prided ourselves with providing our customers with a wholesome product and our employers with a good, safe, working environment. Paris Frozen Foods is one of the few small businesses of its size in our area to offer health insurance to its full-time employees (which has been a financial challenge, in and of itself). The cost of this initiative would jeopardize benefits at the least, jobs if product lines must be sacrificed, if not our outright viability.

We 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, such as ours, is following the long-standing, safe processes of HACCP. We appreciate the chance to comment on the Draft Guidance on HACCP System Validation. Thank you for your time and consideration.

Sincerely,

Allan L. Hopper  
President  
Paris Frozen Foods, Inc.

**Rhodes, Suzette**

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**From:** Ted Slanker [ted\_slanker@dishmail.net]  
**Sent:** Thursday, April 08, 2010 3:40 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Comments - Draft Guidance on HACCP System Validation

Slanker's Grass-Fed Meats  
3255 CR 45400  
Powderly, TX 75473

April 8, 2010

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

Dear Mr. Almanza:

Slanker's Grass-Fed Meats (SGFM) is submitting these comments regarding the Draft Guidance on HACCP System Validation that were publicly released on March 19, 2010.

Yesterday it came to my attention that the FSIS is currently considering a change in the enforcement of the HACCP system validation. Why, I do not know. But I do know that for us the current system has produced a safe meat supply when following the current HACCP plans. These plans use the FSIS standards, FSIS Federal Register documents, and peer reviewed studies to maintain reliable processes.

SGFM is a small meat retailer that fills a very tiny niche market. All of our products are processed and made by a small inspected meat processor. We have been in business since late 1999 and currently have customers in all 50 states. Our business employs five people. Every week we ship meat to families (and a few health food stores) who desire high quality grass-fed meat products. All of our employees and their families also consume the products. I myself eat about two pounds a day of these products.

From what I have been told, if the new FSIS rules go into effect as proposed and IF our processor stays in business, our product costs would go up significantly – especially if we were the only customer of our processor left who wanted to pay more than we all do now. Since our processor is small, we are small, and our customer base is small (we sell less meat than most neighborhood grocery stores) already our costs are higher because nothing is mass produced. But if our costs jumped, our already higher costs would be unbearably higher and impossible to pass on and still stay in business. Consequently, we see the proposed rules as the death knell of small meat processing/retailing enterprises here in the United States of America.

Why the USDA would have programs that are supposed to help grow the small food movement (small farms, farmer's markets, etc.) and then try to set up rules that make it impossible for them to function profitably is one of the great mysteries of our modern age. Also, why anyone would propose rules that would force businesses to close their doors and add to the unemployment roles at this stage of the business cycle is even more of a wonderment. Maybe folks in Washington can understand it, but I can't.

Oh, and if you think we'd switch to a big meat packing company to do the same job (all of the huge packers probably have no problem with the new rule proposals) it won't happen. The reason we do business with a

small meat plant is that we are all on the same playing field. They NEED us, just like we NEED them. Over the years we have tried other larger companies and even though they were not really huge, they had little interest in serving us. Consequently our costs were higher, or product quality lower, and our flexibility greatly restricted. So we know the ropes and see the new rules as being totally destructive and not at all constructive. Whoever dreamed them up has to live in some sort of isolation from the reality – or they are on the payroll of huge enterprises that can easily spread the additional costs across much larger inventories and end up reaping the benefits of even less competition.

Obviously the new rules as proposed would put our meat processor out of business, it would put us out of business, it would put our many grass-fed livestock producers out of business, and it would deprive fellow Americans access to products they want. All of the people being impacted by this are Americans and now all of us who know about it have to live day to day under the threat of new rules that could destroy everything we have all been working on for many, many years.

We 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 thank the government for still letting us comment on rules it might impose on us -- especially the ones that will destroy us.

Sincerely,

Ted E. Slanker, Jr.  
Owner  
Slanker's Grass-Fed Meats

**Rhodes, Suzette**

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**From:** Jeff Perrella [jpp583@gmail.com]  
**Sent:** Wednesday, April 07, 2010 4:54 PM  
**To:** Draft Validation Guide Comments  
**Subject:** validation

Dear Mr. Almanza,

I am writing in regards to the proposed microbial testing/validation program. To include all state inspected establishments in this program is the most asinine, near sighted, thoughtless thing I have ever heard of. Does anyone in your organization have any hands on manufacturing experience? Have they ever run a company or have they ever actually had to make a payroll before? Have they ever had to make a profit BEFORE they could get a pay check? Does anyone that comes up with these brainstorm ever take into consideration what the effects and costs involved will do to small companies? Save your breath, I already know the answer.

I own a very small plant. It is run by my wife and I and two part time employees. We make pasta's two days a week and meatballs one day a week. I have over \$10,000.00 invested in just getting my SSOP and HACCP plans and labels up and running and approved for the one day a week we process meat products. What you are suggesting will at least triple that with an additional annual cost. Our gross sales are less than \$200,000.00 with a single digit profit margin. How exactly do the geniuses that came up with this idea think that I or any other small operator can afford to do this?

Our tiny plant, (it's actually a single large room with one walk-in cooler and one walk-in freezer), is inspected by the State of Minnesota every day we produce product. He is there watching everything we do every day. In addition to looking over my shoulder all day our inspector tests 20 swabs per year for listeria. I am also required to have an ADDITIONAL 24 swabs tested annually, (with a perfect record I might add). He constantly tests temperatures, tests our chemicals, our water temps. etc. I am ALREADY doing everything necessary to comply with the HACCP food safety systems. In addition, I purchase my raw product from a plant that is ALSO following a HACCP plan. There isn't anything going on here that isn't watched over, measured, scrutinized, tested etc. At what point is enough, enough for you people? Do you WANT to put me out of business? This is so stupid it makes me angry.

Our inspector has five small plants that he goes to every week. If this validation is implemented ALL FIVE plants will drop out of the program. In our case it will also close our doors. That means that we will all lose our livelihood. I am 56 years old, who do you think is going to hire me? You are messing around with peoples lives here with absolutely no reason.

Someone there needs to use some common sense. Small plants like ours are already doing everything necessary to insure the safe processes of HACCP. Small plants are watched way more closely then large ones for the simple reason that there is not enough is going on here for anything to get out of hand. There just isn't that much to keep track of. Our inspector has more than enough time to do a thorough evaluation every time he walks in the door. Plus, I and my

crew follow our plan to the letter. There should absolutely not be ANY  
in plant microbial testing required for any plant that has faithfully  
followed every letter of the HACCP such as ours.

Respectfully,

Jeff Perrella

Sammy's Kitchen  
Hibbing, Minnesota

**Rhodes, Suzette**

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**From:** Joel Salatin [husbandman@northriver.coop]  
**Sent:** Friday, April 09, 2010 1:50 PM  
**To:** Draft Validation Guide Comments  
**Cc:** Joe Cloud  
**Subject:** HACCP validation proposal

To FSIS folks--

On behalf of our 50 restaurants, 10 retail establishments, and 4,000 families who depend on our farm to supply them with local, transparent, nutrient normal, pathogen-free, living, ecologically-honest food, the proposed validation process for HACCP is a slap in our face.

In every single overhaul of the FSIS, since its inception, within two years of the changes, the U.S. has lost nearly half of all its processing facilities--almost always the smaller ones. The local food movement is growing exponentially precisely because of the centralization and mega-sized facilities that encourage compromised and risky food.

These proposals will inordinately discriminate against small plants which don't have the volume to spread the new overhead costs over millions of pounds. Small plants already carry a prejudicial testing burden due to low throughput volumes per test. To stack yet more burden on small plants is both inappropriate and penal.

At the very time when Michelle Obama has launched the "Know Your Farmer" campaign and Americans are seeking an alternative to industrial food, FSIS appears to be sabotaging this movement. Many of us will simply begin processing on our farms, using agistar, CSA, gifts, pre-purchase, rentals and other techniques to keep local food flowing to our constituents. It seems in the best interests of FSIS to actually have a policy that promotes small processing plants, since they are empirically and emotionally the antidote to the very realities that scare both inspectors and consumers.

Thank you for your attention to this matter. If this policy does indeed go into effect and either shuts down another half of the plants or greatly raises the costs of doing business (or both) the local food movement will be unforgiving. It has traction and it's vibrant. Please work with this historically-normal system rather than against it.

Thank you.

Respectfully,

Joel Salatin, CEO  
Polyface Farm  
43 Pure Meadows Lane

**Rhodes, Suzette**

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**From:** B. Geary [thinkcivic@gmail.com]  
**Sent:** Sunday, April 11, 2010 12:49 AM  
**To:** Draft Validation Guide Comments  
**Subject:** Comments - Draft Guidance on HACCP System Validation

April 10, 2010

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

Email: [DraftValidationGuideComments@fsis.usda.gov](mailto:DraftValidationGuideComments@fsis.usda.gov)

Re: Comments - Draft Guidance on HACCP System Validation

Dear Mr. Almanza:

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

It has come to my attention that you are currently considering changing the enforcement of the HACCP system validation. I am unsure of the reasons for this change since our local meat production has safely operated under the current system for over 10 years. I believe the current system has produced a safe meat supply when following the current HACCP plans. These plans use the FSIS standards, FSIS Federal Register documents and peer reviewed studies to maintain reliable processes.

There are currently several thousand small meat processors across the United States. They produce high quality meat products. These products are then consumed by their own families, communities and satisfied consumers across the country.

Businesses that supply the small meat processors employ many workers who could be affected by this increase in the cost of complying with the change in enforcement. Many processors believe the new validation requirements would drastically alter their businesses. Most would be forced to significantly reduce the number of products they produce and the number of employees needed to produce them. Obviously this would have a large impact on related businesses since a reduction in products would require fewer supplies and fewer purchases of new equipment.

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.

Yours truly,

B. Geary  
2545 So. Birmingham Pl.  
Tulsa OK 74114  
[thinkcivic@gmail.com](mailto:thinkcivic@gmail.com)

cc: Oklahoma Rep. Ron Peters  
Oklahoma Sen. Seneca Scott  
US Representative John Sullivan

HAUN'S MEAT & SAUSAGE, LLC

May 1, 2010

To Whom It May Concern:

This letter is being written in response to the validation guidance proposed for HACCP systems. The big question would have to be why? If you were so worried that HACCP plans were being used as recipes, than why not use your on the ground inspectors to prove a particular plants plan is not working, not by implementing another set of rules and regulations. If 90% of the meat processors are small or very small and they produce 10% of the market share in the USA - how could these small businesses be posing such a huge risk. You are going to kill off the very system that allows the small processors to serve their local and regional markets. This also ties in with all the farmers markets, niche marketing associations and individuals and the farm to plate program and the local taxpayer who raises animals to feed his family and local neighbors. Citizens like to eat locally grown products. These citizens provide local jobs, pay local, state and federal taxes. We don't need to loose more agricultural jobs.

If a small or very small processor puts out an (unsafe) product his name or family name is on every package. If I have to prove to a scientist that the product I process is safe that goes against the rules and regulations that USDA and my state have already in place and are currently being used by all processors across America.

IF F.S.I.S. goes down this path it will eliminate a large number of small and very small plants that serve the communities across America giving the large processors such as Swift, Tyson , etc. even more market share and power to sway the rules their way and any direction.

This is the same story as the financial institutions new rules and regulations that are set up for huge banks and the will crippling to local and regional banks. The federal government is hell bent to prove they are going to protect the public – protect from whom and what?

Sincerely,

Jerry Haun

Past President Northwest Meat Processors Association

Current Region 8 A.A.M.P. director