

## White, Ralene

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**From:** Ann Herdina [saherdina@rswb.coop]  
**Sent:** Wednesday, June 02, 2010 12:02 PM  
**To:** Draft Validation Guide Comments

*"As drafted, these new regulations I believe will drive small meat processors out of business. Many will not be able to manage the financial or administrative burdens the new regulation will require. As a result, if these rules are put in place farmers' options will be further limited."*

These new rules would require small meat processors to go through a costly testing and "validation" for each type of product they offer to farmers or consumers. USDA is advancing these new guidelines in the name of "food safety," yet the agency hasn't provided a clear and supportable case for the existence of a food safety problem that this validation initiative will resolve.

Many livestock farmers rely on small meat processors in order to help get their product to market as well as add value to their meat products. The Land Stewardship Project recognizes that small and mid-sized butchers and meat processors are key partners in making local and regional food systems work. While clearly not all livestock farmers are using local meat processors, a growing number are, and it is a trend LSP supports.

We have no reason to believe that these new rules will make meat products any safer, especially when you consider the majority of food-borne illness in meat products come from the giant corporate meatpackers like Smithfield, Tyson and JBS.

What we do believe is that the new regulations could hurt family farmers who rely on local butchers and small meat processors. Local and regional food systems are growing and the last thing we need is new USDA regulations that will place roadblocks or result in higher costs for all parties involved in selling butchered or processed livestock.

*I'm concerned that the proposed validation regulations out of the Food Safety and Inspection Service will be costly for small meat processors, forcing them to increase prices for slaughter and processing, or worse, go out of business. USDA needs to rethink these new rules; they don't increase food safety and sure don't help local food systems or family farmers.*

William Dayton  
Dayton Meat Products Inc.  
102 Montezuma St.  
Malcom, IA. 50157

June 7, 2010

**Address**

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

Email: DraftValidationGuideComments@fsis.usda.gov

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

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Dear Mr. Almanza:

From the FSIS Fact Sheet on Validation , sent out on May 3, 2010 it states:

*"Do plants have to do microbiological studies? No, The Agency made clear that no one needs to do a study. We have stated that if a plant, for example, is using an FSIS guidance document that suggests a certain time/temperature combination to address a particular pathogen, and the plant has records that show that it is meeting those times and temperatures, it has done everything that it needs to do to validate its HACCP plan. Of course, an establishment may decide that the best way to validate its plan is to do a study, but the Agency is not requiring establishments to do so."*

What the underlined says to me is you can choose do a study but is not required **at this time**. FSIS has still not ruled out testing for all HACCP plans...**at this time**. I would like to have it in writing that the testing for Validation of HACCP plans will not happen.

Since the inception of HACCP all processors making products have used established scientific support data to Validate products .To meet the second aspect of Validation, establishments have records of Verification that consistently meet the parameters specified from scientific support to control the specified hazards. Records have been produced from these plants to show all parameters have been met. Using this, where is the evidence of food borne pathogens from processing facilities not having Validation studies done?

**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.

Sincerely,

  
William Dayton  
Dayton Meat Products Inc.

cc: Secretary of Agriculture Tom Vilsack  
United States Senator Charles Grassley  
Congressman Leonard Boswell

## White, Ralene

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**From:** Katie Brouse [katiebrouse@comcast.net]  
**Sent:** Monday, June 07, 2010 8:55 PM  
**To:** Draft Validation Guide Comments  
**Subject:** USDA Press Release No. 0150.10

To Whom it May Concern:

I am writing to express my concern about the effect that new regulations (USDA Press Release No. 0150.10) will have on small, community-based meat processing plants. The financial burden will likely be great, causing many local producers to have to shut down.

According to an article today in "The Atlantic", "These new HACCP requirements are going to cause a train wreck in a portion of the industry that is growing for the first time in years...Someone needs to take a clear-eyed look at this situation and find a way to split the agribusiness mega-plants from the community-based localized plants within the regulatory structure," and I couldn't agree more. It has been my experience that local farmers are extremely conscientious about food safety, and it would be a shame to lose this resource as well as the jobs that this growing industry provides. I urge you to consider taking a close look at the impact this proposal will have on small and very small meat processing plants and revise the regulations to be flexible for this portion of the industry.

Thank you for your time.

Sincerely,  
Katie Brouse  
Madbury, NH

## Rhodes, Suzette

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**From:** Tom Hunter [hunter.ts@gmail.com]  
**Sent:** Friday, May 21, 2010 1:09 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Small meat processors -- proposed "food safety" rules

Secretary Vilsack,

I believe the rules that the USDA has proposed for additional inspection and testing of small regional meat processors constitute a serious threat to their existence. This is exactly contrary to your own "Know your farmer, know your food" initiative. These additional rules are unnecessary and would do little or nothing to counter the real threat that exists from very large meat processors.

Meat inspection rules and testing should be adjusted according to the number of consumers that would be adversely affected by an incident. E Coli in ground beef from a large processor, that mixes ground beef from many sources and many carcasses, carries a exponentially higher risk of damage than does ground beef from one carcass processed at a regional processor. Frequency of inspections and types of testing required should be based on the number of consumers that can be expected to consume a given lot of meat produced. This would logically, fairly, and equitably manage the risk.

I believe that the huge meat processors represent the same kind of uncontrollable risks as do offshore oil drillers and huge financial corporations. That is, the consequences of a failure far outstrip anything they can do themselves to mitigate the damages. We must not, in a misguided approach for safety, drive our meat processing industry solely into the huge category. Our small local and regional processors are safe providers of livelihoods and wonderful food to many people in rural areas.

Thank you, Tom Hunter

## Rhodes, Suzette

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**From:** -Tivey. [tiv.tivey@gmail.com]  
**Sent:** Thursday, May 20, 2010 9:37 AM  
**To:** Draft Validation Guide Comments  
**Subject:** do not punish local farmers

The Food Safety and Inspection Services (FSIS) division of the United State Department of Agriculture (USDA) is proposing new rules which will impact small meats processors greatly and could make meats from my local family farmers unavailable to me.

This proposal, most likely written by large businesses to put small businesses out of business, runs counter to all our local efforts to cultivate relationships and practices which support our farmers in Minnesota.

If this proposal is in response to recent incidents in which large, factory, industrial food producers have endangered public health through unsafe practices and insufficient oversight, this response is as far from the solution as it could possibly be. Who in their right mind would come up with such a proposal? I mean, think for one whole minute about it.

Think about the motivations behind this kind of violence to our small local growers. Who is proposing this? and why? and do you want to side with them in the destruction of family farms?

Ken Tivey  
Saint Paul, Minn

## Rhodes, Suzette

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**From:** John and Marilyn Palmer [jpalmer16@stny.rr.com]  
**Sent:** Wednesday, April 14, 2010 11:23 AM  
**To:** Draft Validation Guide Comments

To Whom It May Concern:

It has come to my attention that the USDA is poised to impose some extremely unrealistic requirements on slaughterhouses, which have the potential to make the organic and sustainable meat industry come to a grinding halt. As a consumer who eats only organic foods, this is of extreme concern to me! The proposed regulations would require every meat plant, no matter how small, to perform their own testing of carcasses, products, and machinery at every point of processing by collecting samples and then sending them to a lab. The data collected in these tests would be further documentation of pathogen control in the plant. Currently, smaller plants, who do not have the capabilities to perform these tests, are able to use previously collected data and apply it to their own methods. This has proved to be a safe and reliable method of controlling pathogens thus far. It's not the small, meat packing plants that are the problem - it's the agri-farms and agri-processing plants! If small processsing plants are forced to buy the equipment necessary to do their own testing, they will most assuredly be forced out of business - and local organic meat producers will have nowhere to go to have their meats processed. The consequences of such an all-encompassing proposal will be disastrous not only for small organic farms, but for those of us to rely on them for our food! PLEASE reconsider the wording of your proposal so that it pertains to agri-businesses and not the small, local, organic processors!

Sincerely,  
Marilyn Palmer

Incoming-Losure.txt

From: David Losure & Mary Schaeffer-Losure [losedr@ncn.net]  
Sent: Tuesday, May 04, 2010 4:49 PM  
To: AGSEC -USDA  
Subject: FSIS Proposed Validation Regulations

Dear Secretary Vilsack,

My husband and I are very concerned that the proposed validation regulations out of the Food Safety and Inspection Service will be costly for small meat processors, forcing them to increase prices for slaughter and processing, or worse, go out of business.

We purchase all of our meat through local farmers so that we have control of what is in the meat we eat and how it was raised.

Those farmers all use small local processors/butchers, and for pork especially, those processors turn the meat into many different products. It appears that the proposed regulations would mean many samples of every product would need to be sent for examination creating huge costs that these small processing businesses would have to bear, which most are saying that they could not bear and would have shut down. The proposed new regulations could therefore, make it impossible for us to continue to obtain the only meat we will eat, since the large growers and processors who the proposed regulations would harm very little do not in our opinion create meat that is healthy to eat.

Furthermore the proposed regulations could severely hampering the growth of local and regional food systems which we rely on.

We have purchased meat from small processors for many, many years and feel that their products are already much safer than what we could get from any other source so please don't force them out of business or force them to have to charge us more because of new regulations.

Thank you.

Mary Schaeffer-Losure

P.S. Until a few years ago we raised free-range pork and used several small local processors for the meat we sold direct to customers. However the effect ethanol had on the cost of corn in the feed we were purchasing - it doubled in one month when the first corn for ethanol was harvested then later tripled - forced us out of business.

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losedr@ncn.net  
www.flyingpigfiddleandbanjo.com

## White, Ralene

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**From:** Carol Ford [fordcj@morris.umn.edu]  
**Sent:** Wednesday, June 02, 2010 12:16 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Input on guide

Thank you for the opportunity to weigh in on something as important as the USDA's proposed new meat testing regulations for small processors. As a meat consumer and resident of a rural town in west central Minnesota, I am greatly concerned about the predictable damage these proposed regulations will have on the small meat processors who provide me and my community with the locally raised beef, pork and poultry we want to purchase. All of the farms we buy from rely on small processors in nearby towns. The new regulations include testing and validation requirements that small businesses cannot afford.

As a consumer, I am very interested in safety and quality in the foods I buy. That's precisely why I buy local. I know the farmers, I know the business owners and employees who process those meats. I am far less likely to run into contamination from their products than I am from the huge corporate meatpacking plants that I avoid whenever possible.

I ask that the USDA rethink these regulations and consider their potential negative impact on our already fragile rural communities that have been labeled as "food deserts" because of how difficult it is for us to access healthy, affordable food. Don't make it impossible for us to feed ourselves. I want small farmers in my community and I want small processors. There must be saner ways to make that happen and ensure that our meats are safe.

Thank you for your consideration.

Carol Ford  
Office Goddess  
Division of Sci & Math  
Univ. of MN, Morris  
[fordcj@morris.umn.edu](mailto:fordcj@morris.umn.edu)

"Unless someone like you cares a whole awful lot,  
nothing is going to get better, it's not."

-The Lorax, by Dr. Suess

## Rhodes, Suzette

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**From:** allyson.sanborn@gmail.com  
**Sent:** Wednesday, May 26, 2010 3:14 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Message from Internet User - HACCP

I recently read an online article about HACCP. My familys diet is largely based around pastured meat from small, local farms. I am concerned that the new proposed regulations on slaughterhouses will shut down the processors who supply my family with our main source of meat.

Different processing regulations should govern the meat from pastured animals, largely because local meat from animals raised on pasture is different from the meat grown in industrial feed lots. The pastured animals are not fed the same diet or kept in the same conditions and industrial animals, and as such do not become sick in the same ways that animals from large-scale industrial farms do.

Please reconsider passing this bill. It is already expensive to obtain good quality meat, and this bill win increase that problem. Perhaps more importantly, it reduces consumers ability to choose the type of food we feed our family in our attempt to stay healthy. It seems clear that "one size fits all" inspection no longer fits current industry practice and consumer demand. It is my hope that the USDA will recognize this and NOT pass the HACCP bill.

Sincerely,  
Allyson Sanborn

**White, Ralene**

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**From:** Bill Rohring [br\_czm@yahoo.com]  
**Sent:** Tuesday, June 01, 2010 5:11 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Comment on Proposed Food Safety Guidelines

Good Afternoon,

I'd like to provide a comment on the proposed food inspection guidelines proposed for meat processing plants. As one who has had to adhere to rather strict federal guidelines (albeit in a different field) I would recommend the USDA consider providing some flexibility in the guidelines concerning who has to meet the particular inspection requirements. This can ensure the large meat processors, the ones that have to do recalls of millions of pounds of meat products, receive the greatest amount of scrutiny, while the processors with the least amount of beef that would have to be recalled receive less scrutiny. Kind of putting the money where it will have the most impact. This would allow small start-ups the opportunity to actually start and be given a chance to grow and compete against the larger producers.

If all plants, regardless of size, have to meet the same requirements, then there is a very good chance that only the facilities with the deepest pockets will be able to survive, thus actually reducing competition in this segment of the marketplace and only benefiting those that are well-established prior to the rule-making taking effect.

Thank you for the opportunity to provide my comments.

Sincerely,

Bill Rohring

**White, Ralene**

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**From:** Andree Bella [andree.bella@gmail.com]  
**Sent:** Friday, June 04, 2010 10:58 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Local Slaughterhouses

I have a small farm operation which includes grass-finished beef. This is my fifth year. I am dedicated to producing local, nutritious food for my friends and neighbors. We all agree that our local beef is the best we've ever eaten, and it is raised in fields that would otherwise go unused. We use a local, custom-cut slaughter house for processing. This means that our animals only have to be transported a short distance...humane for the animals and minimal cost for us.....and that we also support a local small business.

Our only problem is that every year it get harder and harder to get a processing date. Please do whatever you can to help expand our processing options. Everything we're doing works so well, but we hit a bottle-neck when it comes to processing. We need to support these small slaughterhouses in whatever way possible. These businesses follow careful health standards and should not be subject to excessive regulations which may be necessary in a very large operations, but are inappropriate and too costly for small slaughter houses.

Sincerely,

**Andree Bella**  
**Board Landing Farm**  
**Belfast, ME 04915**