

**Riley, Mary**

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**From:** KBSALSER@aol.com  
**Sent:** Tuesday, April 27, 2010 11:01 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Regulation on Micro testing

The beef we eat has been grown antibiotic and hormone free, range feed by our Amish friends. It is then taken to a local processor who follows strict guidelines and food safety and handling. As a nurse I'm always aware of the importance of good handwashing, hair nets, gloves, contamination, refrigeration, freezing and cooking and how it affects health.

We have never gotten sick from the meat we have purchased from small processors. It is by far healthier than anything that a large industrial food system has that allows ammonia to be used to keep microorganisms at bay, chemicals and dyes to make it appealing to the eye as well as the antibiotics and hormones it is injected with. The possibility of the meat having thawing along the way when traveling distances and handling several times by several people increases the chances of more contamination.

I think that instead of making rules across the board without any regard to the financial turmoil this would create for small packers, you should either allow business making less than a certain threshold per year to be exempt or drop these rules altogether and work solely with companies with repeat recalls and failing tests to increase their testing alone.

Please let's not throw away the baby with the bath water.

Sincerely,

Karen Salsler

Ft. Wayne, Indiana

**Riley, Mary**

**From:** Rebecca Selin [rivkaselin@gmail.com]  
**Sent:** Tuesday, April 27, 2010 7:07 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Local meat packers

I'm writing to express my frustration at your ideas for helping make meat safer. I don't think that punishing the small local meat packers is the way to ensure that the large companies are being compliant. Here, where we get our meat, we haven't had any problems whatsoever... but in my family we've had numerous recalls on meat bought from stores affect us. And we even had food poisoning/sickness that seems to be as a result of store-bought meat, but could never prove it for sure. I think that instead of making rules across the board without any regard to the financial turmoil this would create for small packers, you should either allow business making less than a certain threshold per year to be exempt or drop these rules altogether and work solely with companies with repeat recalls and failing tests to increase their testing alone.

I am very concerned about safe meat but right now, the safest meat we can find is local and is in jeopardy of being eliminated with your proposal. Please reconsider this before subjecting everyone to rules that should only apply to those failing the current standards.

Thanks,  
Rebecca Selin  
Charlotte, NC

**Riley, Mary**

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**From:** Melissa McEwen [mgmcewen@gmail.com]  
**Sent:** Tuesday, April 27, 2010 6:56 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Please Consider The Impact On Small Businesses

I urge the USDA to consider the impact this HACCP system would have on the growing movement of small butchers, meat farmers, and farmer's markets. Many people now look to this small, but burgeoning, market to purchase specialty meat products valued for their contribution to the local economy, taste, and health properties connected to grass finishing. When I wrote my honors thesis at the University of Illinois at Urbana-Champaign on the impact of HACCP on small local food businesses, I couldn't find any studies that analyzed the impact. Despite their small size, they are part of the business landscape and deserve to be informed on the details of this proposal so they may participate in commenting. Furthermore, there is strong evidence that regulations such as this disproportionately impact such businesses. This impact deserves to be further studied as we weigh the costs and benefits of further HACCP implementation. Not doing a full economic impact analysis would be unconscionable.

I would also like to see recognition of the obvious fact that small local food businesses are fundamentally different in their risks and challenges compared to large agribusiness, the source of most large outbreaks this proposal was created to respond to. Such a recognition would allow for specific regulations that are appropriate for small business, further study on less capital intensive HACCP programs, and exemptions that take into account the unique consumer-producer relationship inherent in direct purchasing. Small local food businesses, regardless of their risks, are more traceable and therefore more accountable to the consumer. There is no year long manhunt for the cause of outbreaks when it comes to direct purchasing.

Melissa McEwen  
Consumer, writer, food infrastructure builder.

**Riley, Mary**

**From:** Kim DeForest [kbd4st@gmail.com]  
**Sent:** Tuesday, April 27, 2010 2:57 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Local Meat

*Hello -*

*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.*

*It is important that all areas of food production be safe, but it's also important that those of us that are interested in supporting local farmers and non-mass produced meats that this regulation be reviewed to allow not only the large producers to produce safe meat for the masses.*

*I appreciate your time and the efforts of the USDA to make all food safer for everyone - I just hope it doesn't come at the cost of the ability for smaller producers to participate in the market as well.*

*Thank you so much for your time.*

*Kim DeForest*

**Riley, Mary**

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**From:** Main User [cagwood@bevcomm.net]  
**Sent:** Saturday, April 24, 2010 7:29 PM  
**To:** Draft Validation Guide Comments  
**Subject:** comments on USDA Food Safety and Inspection Service

04/2412010

Docket Clerk USDA,

I would like to make a few comments regarding the new rules proposed for meat testing for small food processors.

1. If the rules contribute to small meat processors going out of business to due cost; where will hunters have their meat processed?  
Many hunters donate their meat to local food shelves after being processed by local butchers.
2. Most microbial contamination is from large food processors due to unsanitary work, conditions and violations of regulations, not from small, clean often family owned meat processors.
3. If many local processors are eliminated due to excess cost of the new regulations the food supply would become more vulnerable since a large processor could easily be closed down due to contamination. Possibly from a microbe we currently haven't encountered yet.

Please consider enforcing regulations on the large producers and have their fees and fines cover the cost of voluntary testing of small food processors.

Gretchen Wessel  
C.L.S. (Clinical Laboratory Scientist)

**Riley, Mary**

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**From:** Main User [cagwood@bevcomm.net]  
**Sent:** Sunday, April 25, 2010 9:04 PM  
**To:** Draft Validation Guide Comments

To who it may concern I have a few comments regarding your new rules regulating the meat testing for food processors.

- A. It would appear the small meat processors would be at a financial disadvantage with additional costs perceived by these imposed rules.
- B. If these costs were passed on to the local and regional consumers and/or the local farmers it would cut the demand for this product; therefore, increasing the cost which would eventually drive them out of business.
- C. It would also cause great harm to the local and regional producers who are raising local grown livestock
- D. Meat lockers and meat processors support small town growth and communities with freshly cut meats.

I appreciate You considering these comments and the impact it would have on small towns and communities.

Thanking you in advance,  
Charles & Graham Wood (farrow to finish small family farm hog producer Jordan MN}

**Riley, Mary**

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**From:** David Abshire [dabshire@energyxxi.com]**Sent:** Friday, April 23, 2010 12:07 PM**To:** Draft Validation Guide Comments**Subject:** Impact On Small Buisness

I have recently bought a small out of business slaughter house/meat market in a small town, south Louisiana. I'm trying to get it up to state standards before opening. This plant would employ roughly 5-10 people and help this small town out with jobs and a very badly needed place to custom slaughter animals. I'm attempting to remodel and update building / equipment and finding out the hard way that this is extremely expensive. I was hoping to complete remodeling and equipment upgrade without having to borrow money from a bank to get started. I have attempted to try and get government grants for going green but to this day it seems like a dead end road each time I turn around. So I more or less resorted back to financing need upgrades from my primary job pay check even though it will take me longer to accomplish my task. Reading this article and other rules/regulations I'm starting to second guess my forward movement on this endeavor of mine. I have always wanted to own a small town slaughter house/meat market and at this point in life felt that it would be the right time to pursue my dream of owning a business. I'm financially able, I felt to get this needed business kicked off slowly and ramp up as I went along. One day having two different locations of operation and being able to retire from my present line of work to be home every night. But reading rules regulations and expenses associated with compliance to regulation I can see that this will most likely be a faded dream of mine. It would seem to me that the our government would want to help the small businesses get started by simplifying, regulations, grants, federal aid/taxes ect. for the working / entrepreneurs. But instead, slowly they are running all the mom and pop, family businesses, out of business. Again I will be rethinking this endeavor. Thanks.

*David R. Abshire*

**Riley, Mary**

**From:** Donald Furrow-Scott [donald@smlwine.com]  
**Sent:** Friday, April 23, 2010 1:44 PM  
**To:** Draft Validation Guide Comments  
**Cc:** The Colemans  
**Subject:** new meat testing regulations for small food processors

I am outraged at yet more food regulations being proposed "in my best interest" by folks who think all food comes by waiter to their table. I live on a farm, eat food raised on farms and am proud of my fellow farmers who STRUGGLE against all odds to provide us with better quality, healthier food than what is available at our local super-stores. Imposing food-conglomerate sponsored legislation & regulations whose net effect, intentional or unintentional, is to eliminate the small producer is infuriating to us.

This is one registered 5th congressional district citizen who monitors this type of legislation/regulation and votes & contributes based on candidates records on this primary issue of concern. I have no problem voting out politicians who fail to stand up for this issue until we get one who dies.

donald furrow-scott  
24121

copied to Tom Perriello's email form

## Rhodes, Suzette

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**From:** Lance Fromme [lfromme@comcast.net]  
**Sent:** Sunday, April 18, 2010 11:49 AM  
**To:** Draft Validation Guide Comments  
**Cc:** lfromme@comcast.net  
**Subject:** Please don't put the small processors out of business!

The proposed reinterpretation of USDA rules for meat inspection appears to place the small processors (butchers/slaughterhouses/meat processors) as well as the small producers (family farms, sustainable farming operations) at a further economic disadvantage relative to the big factory processors & producers.

Certainly this is not the intended result, when the **root cause** of the problem (tainted meat products) is largely the result of practices at the **big factory processors**.

Certainly the large processors need better inspection than has been the case so far... or perhaps alternatively there should be larger consequences for producing sub-standard products.

But creating this severe hardship on the smaller, locally-focused processors will harm the growing body of consumers who, like me, wish to purchase agricultural products from close by, grown and processed by people and businesses in my region, and generally of higher quality through and through. Higher processing costs will inevitably reduce the size of the market, reducing the pool of small processors, and leading in turn, to economic disadvantage to local non-factory farms. All because of problems created at the large operations!

Please make some kind of allowance for the small processor so this new rule doesn't put them out of business!

Lance Fromme  
23 Burton Farm Drive  
Andover, MA 01810

## Rhodes, Suzette

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**From:** Wendy Babiak [wbabiak@twcny.rr.com]  
**Sent:** Sunday, April 18, 2010 12:55 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Your plans to eliminate small meat processors

To Whom it May Concern:

Please do not make it impossible for small local farmers to supply meat to restaurants, our local groceries and co-ops, as well as the Farmer's Market, in Ithaca, NY.

While I understand both the budget crisis as it affects your ability to monitor smaller processors and the need to ensure public safety, it's clear that this will have a deleterious affect on our ability to eat locally raised meat. Eating local is known to be preferable both in terms of health of the planet, health of the economy, and health of consumers.

There must be some compromise that can be made to ensure that local farmers can continue to bring meat to our tables.

best wishes,  
Wendy Babiak

## Rhodes, Suzette

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**From:** mpotucek@stny.rr.com  
**Sent:** Sunday, April 18, 2010 1:50 PM  
**To:** Draft Validation Guide Comments  
**Subject:** New requirements for meat processing plants

> To Whom it may concern,

I understand the need to ensure safety when it comes to any food product, but there must be a way the government (USDA) could look closely at the processes for both large meat processing establishments and the small ones and make decisions that would meet their goals while not harming the smaller processors. Why is it every time we hear the government, whatever agency, proposes some type of new regulation, the results of implementation puts an extreme hardship on the smaller establishments to the point of putting them out of business by creating a situation where it costs the "little guy" so much they can't stay in business or it means them laying off workers to save their business due to putting the money towards these high costs, both results are not what anyone needs in this economy. Not to mention this then takes another option of choice from the individual consumer, by the loss of smaller processing establishments within a local area, so we know who we are buying from and trust their products, to the negative impact on the farmer providing the wholesale meat products and of course for the ones who remain, the high cost to everyone in the chain. My family buys almost all of our meat products from a local trusted organic meat store and we know the local processing plant as well and trust their processes. I would prefer more regulation on the products coming in from foreign countries that presently don't have to meet the same requirements the USA companies do. Please revisit this issue and ensure fairness to the smaller establishments so they can afford to stay in business and continue to have their products inspected, while allowing us to have the choice regarding where to purchase our products. Thank you for your time.

Sincerely,

MJ Potucek, Sayre, PA

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**Rhodes, Suzette**

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**From:** Olivia Hall [omh4@cornell.edu]  
**Sent:** Saturday, April 17, 2010 6:45 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Please preserve small slaughterhouses!

Dear Madam or Sir,

I was very disappointed to learn that a reinterpretation by USDA of existing regulation could portend the demise of many small slaughterhouses. The availability of locally raised, natural or organic meats is very important to me and my family. However, without access to slaughterhouses within a reasonable driving distance, the small farms that raise animals in a way that I want to support may no longer be viable.

Please help to preserve the small slaughterhouses that make the consumption of healthy, sustainably and humanely raised meats possible to me, my family, and many people who care about these issues across the United States.

Sincerely,

Olivia Hall

## Rhodes, Suzette

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**From:** Jonathan Greene [jongreene@gmail.com]  
**Sent:** Sunday, April 18, 2010 8:25 AM  
**To:** Draft Validation Guide Comments  
**Subject:** response to new meat inspections regs

Hello,

I am writing in response to the new proposed meat inspections regulations. I am a resident of upstate new york, where local meat production is finding a foot-hold that is boasting the local agriculture economy. I am all for regulations that promote the health and welfare of the public, especially as it pertains to the food supply.

But local (small) meat producers do not have the financial means to meet some of the new regulations proposed into place in a manner that is feasible within a short period of time. I would urge USDA to review the implications of these regulations for smaller producers and the plants where they process meat. Provide some flexibility on implementation of best practices that meet the spirit of the guidelines. But do not unduly burden these local producers with "sledge hammer" solutions that merely require only a rubber mallet.

We like our local meat in Central New York and would like to see this industry thrive in the future. In order to do so USDA must support efforts to regulate these cottage industries in a manner that is consistent with the industry, but address the local needs.

Regards,

Jon Greene

## Rhodes, Suzette

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**From:** Andy Ives [3braids@lightlink.com]  
**Sent:** Sunday, April 18, 2010 6:36 AM  
**To:** Draft Validation Guide Comments  
**Subject:** local meat

We eat local meat almost exclusively and it's wonderful. Our health is great and the meat of the highest quality.

I think it would be a smarter choice to go after the larger meat farms and producers to make them bump up their standards so the meat isn't tainted with chemical fertilizers, hormones, antibiotics and the like.

To give the lower quality meat the upper ground and try to eliminate the higher quality meat is ridiculous, selfish for corporately connected businesses and profit driven only. It's against any small independent business, proper health care, and against democratic behavior.

Thank you for your time and consideration,  
Wendy Ives

## Rhodes, Suzette

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**From:** Aaron Weinberg [aarondweinberg@gmail.com]  
**Sent:** Saturday, April 17, 2010 6:43 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Comments on Reinterpretation of Slaughterhouse Regulations

Dear USDA,

I am writing concerning your recent reinterpretation of the slaughterhouse inspection regulations.

While I applaud your efforts to ensure the safety of our food supply, I am concerned that the proposed reinterpretation will add a substantial financial burden to small, regional slaughterhouses. I live in upstate New York and these businesses (such as the Leona meat plant) provide a vital service for local, small-scale farmers and - as a result - those of us who are interested in supporting farmers who do not wish to raise animals in CAFOs. These farms are important to the local economy and provide a way of raising meat that is inherently more sustainable than large-scale alternatives; by increasing the cost of inspecting the slaughterhouses, these farmers may not be able to stay in business.

I hope that you are able to find a solution that both enhances the safety of our food supply and allows small farmers to stay in business.

Aaron Weinberg  
Ithaca, NY

## Rhodes, Suzette

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**From:** Margot Brinn [margotbrinn@mac.com]  
**Sent:** Saturday, April 17, 2010 8:12 PM  
**To:** Draft Validation Guide Comments  
**Subject:** USDA regulations

Dear USDA:

I am writing to ask the USDA not to re-interpret rules in such a way that small farmers who sell to local stores must be USDA inspected.

i know the local farmers; I do not want them to have this additional and unnecessary burden. Furthermore, the additional expense will make the product more expensive for us and force some small farms out of business. We are at a time in history when we must do everything we can to keep those small farms and businesses going.

Thank you for your attention.

Margot Brinn  
607-272-3037  
600 B Hector St  
Ithaca, NY 14850