

June 3, 2010

Alice Percy
Treble Ridge Farm
528 E River Rd
Whitefield, ME 04353

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

To Whom It May Concern:

I am a full-time small-scale diversified organic farmer in Maine. A major portion of our business is raising organic hogs, which we have processed to order at a very small USDA-inspected slaughterhouse and sell under our own label at farmers markets and to local independent retailers.

I have recently become aware of the USDA's plan to institute new HACCP rules that will apply equally to all slaughterhouses, regardless of size. Requiring very small slaughterhouses such as the one we use (which can process about thirty pigs and a dozen cattle in a week) to conduct constant testing for pathogens is unreasonable and economically unsustainable. There is a swelling demand from consumers in many areas for foods produced by small, local farmers using small, local processing plants. To help develop this market niche, which is an economic bright spot in a dismal economy, the USDA must recognize that meat processors come in many different sizes and that flexibility in addressing the needs of small and very small processors is absolutely necessary.

Operations at a small plant like this offer far fewer chances for contamination than occur at a large plant. There are fewer animals and fewer employees, there is less hurry and less machinery, and the ratio of inspectors to pounds of meat is enormous compared to what is present in large plants. And if a problem did occur, the meat is not being shipped overnight to millions of consumers across the country. Traceability is relatively simple, and the number of consumers affected far smaller. Simply put, the risk to public health posed by meat from small processing plants is miniscule in comparison to that of meat processed at huge slaughterhouses.

When small plants are forced to work under regulations designed for much larger facilities, then unnecessarily high overhead costs are distributed among far less product. The result is that for my farm operation, processing costs exceed feed costs. In fact, the cost of processing a pound of my sausage is higher than the cost of a pound of mass-produced sausage at the supermarket.

Please help preserve small businesses like mine and my processor's, and preserve the choice of consumers to buy meat from businesses like ours, by making the HACCP requirements for small processing plants reasonable and flexible.

Sincerely,

Alice Percy



Rhodes, Suzette

From: kerry Swain [funnyfarmnaturally@yahoo.com]
Sent: Friday, April 16, 2010 8:53 AM
To: Draft Validation Guide Comments
Subject: meat plants

I am writing today to express my concerns regarding the proposed changes to slaughter house testing regulations.

As a small sustainable farmer that produces meat, I am afraid that my local meat plant will no longer exist due to the overwhelming regulations imposed on their business.

This will likely be creating an underground movement. It will force farmers to butcher themselves or quit raising meat all together. In the end, this will likely cause more untraceable meats than it will help to curb deadly outbreaks.

Why can't a division between large commercial meat packers and small meat plants be accomplished? There has to be a way to protect the consumer on different levels based on volume. How many small packers have had instances where a meat was rejected and or found to be contaminated versus the large factory meat packers? It seems to me that the sheer numbers are the culprit in many of these outbreaks. NOT the small processors.

If this passes, it will cause hardship from the processor, to the producer right down to the consumer. No one will be able to afford the new cost of processing. So even if the plants implement and pass on the costs of the improvements, the consumers will not be able to purchase the products at those new exorbitance costs.

There must be a compromise and a distinct division based on volume to be effective in the quest to trace and control the country's meat industry.

Please continue to work towards a more feasible solution.

Kindly,
Kerry Foose

The Funny Farm
Rr 1 Box 1127
Hop Bottom, PA 18824
570-434-2367
[Http://www.freewebs.com/funnyfarmnaturally/](http://www.freewebs.com/funnyfarmnaturally/)

White, Ralene

From: Grassroots@pasturesaplenty.com
Sent: Sunday, June 06, 2010 5:03 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - Comment on the Draft Guidance: HACCP Systems Validation

We are a small farm and meats marketing company in western Minnesota. Our farm, which is about one tenth the size of its neighboring farms, fully employs all four adults in two families. Our meat marketing efforts make this possible. We are virtually a picture postcard of Secretary Vilsacks "Know your food, know your farmer" program and a first rate example of rural economic development that works.

We use a small state "equal to" processor to slaughter, cut and process about 800-1000 head of our own hogs each year for sale into Twin Cities and local markets that we have developed over the last twelve years. Our concerns about the new regulations for small and very small plants are these:

First, that no one including the FSIS has made public the evidence that small and very small plants are any kind of a food safety concern. Perhaps the evidence does not exist. We hear in the press only about very large plant contaminations. Justification ought to come before regulation, we think.

Second, that it has evidently not been considered that small and very small plants perform a large variety of different processes to produce a variety of products. We see nothing in the Draft Guidance to suggest that anyone has taken note of the fact that these procedures are apt to place a crippling burden upon an establishment that regularly makes thirty or forty different products containing one farms pork, as ours does. And yet, the customers that buy from us make clear that their reasons for doing so are taste, knowing us the farmers, and trusting the safety of the food because it was made in a small family owned and operated shop. They are impressed when we tell them that they can go in person and visit with the shop owner who is also the head butcher who prepares their meat. How are we to serve this kind of customer base if we must somehow get each product made for us by some huge plant because regulations have driven our small plant out of business? And which huge plant would have anything to do with us? How serious ARE you folks about "know your farmer, know your food"?

Third, the very fact that each of the systems at our plant the slaughter floor, the sausage machinery, the smokehouses are used intermittently and scrubbed clean after use is itself a major food safety plus when compared to a twenty four hour a day operation of a large plant. Surely your food scientists know this. Any livestock farmer knows that the best way to cut down on the incidence of disease in animals is to get the buildings empty regularly, clean them well, and let them sit empty for a week or so.

In sum, small and very small meats plants are different in type from the large, and not just in terms of size. They run differently, the work is different, the hazards are less, the products are many and varied and they most certainly serve a different market. If you try to regulate them with some version of the regulations suitable for large plants, you will destroy them.

And last, you need to consider, as does the meat industry as a whole, the fact that many of our customers tell us that if they cannot eat our meats from animals raised the way we do and slaughtered and processed as our plant does, they will give up meat entirely.

Please be careful not to close up the small plants. Our farm and its families depend upon those plants.

Yours respectfully

Pastures A Plenty

Josh and Cindy Van Der Pol
Jim and LeeAnn Van Der Pol

Rhodes, Suzette

From: Gaaswerks Account [gaaswerks@gmail.com]
Sent: Friday, April 16, 2010 2:30 PM
To: Draft Validation Guide Comments
Subject: comments

Dear Mr. Almanza:

Gaaswerks.com, llc 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 buy meat through local small meat producers that have their meat processed by small local processors across the state of Oklahoma.

We are concerned that this regulation will greatly decrease our ability to obtain locally processed, high-quality meats. The processing of local meat is important to the rural economy. The impact on the communities in which the meat is produced when local processors are closed will be enormous, not to mention the effects on the health of those who will not be able to buy locally produced, high-quality meat.

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.

Gaaswerks.com, llc appreciates the chance to comment on the Draft Guidance on HACCP System Validation.

Thank you for your time and consideration,

Sincerely,

Steele & Genie Ford

Rhodes, Suzette

From: elizabeth osullivan [elizabethosulli@hotmail.com]
Sent: Saturday, May 15, 2010 11:26 PM
To: Draft Validation Guide Comments
Subject: meat testing regulations

Dear Sir or Mdm.

I am very worried about the USDA's drafts of new meat testing regulations for small processors. I am really that these new regulations could put small processors out of business. Without those small processors, small farmers would not be able to sell their meat to people at a time when folks are really excited about local food. The number of tiny farms has grown greatly in recent years, and those small-scale farmers are selling their products to a small but enthusiastic and quickly growing market.

I do not believe that these regulations will make the public any safer. Most people who get sick eating meat are not eating meat from small processors. These processors also do not face many of the conditions that make the larger processors more vulnerable to spreading foodborne illness.

Please make exceptions for small processors in your rules. People want a choice about the kind of meat they buy, and small business people (processors and farmers) deserve a chance to make a go of it. They don't need any more obstacles in their way, and their work is not making the American people unsafe.

I raise chicken and sell it to a niche market. I don't want to see my local processor hurt by these regulations. I am so afraid they will hurt my business by hurting my processor.

Sincerely,
Elizabeth O'Sullivan
12456 Bagley Ave.
Dundas, MN 55019
507-645-4662

The New Busy is not the too busy. Combine all your e-mail accounts with Hotmail. [Get busy.](#)

Rhodes, Suzette

From: mnwoods4@comcast.net
Sent: Friday, May 28, 2010 10:26 AM
To: Draft Validation Guide Comments
Subject: Proposed new testing for meat

To:

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

From: Dana Wood (Supporter of small, local farm businesses)
resident, Woodbury, MN

Please submit the following on my behalf. Thank you.

I and my family purchase our meat from local businesses such as Pastures A Plenty and Red Tail Valley. As I understand it, Belgrade Meat Center, their processor, may be required to submit their meat products to as many as thirteen tests per product, costing perhaps \$10,000 per product to initiate and another \$3500 annually to maintain. Considering the fact that they offer about 40 different processed beef and pork products in addition to all the fresh cuts, the implementation of these kinds of requirements on such small businesses will be a huge financial burden and will ultimately shut them down. There must be a way other than The Food Safety and Inspection Services (FSIS) division of the United State Department of Agriculture (USDA) proposing new rules that will impact small meats processors so dramatically. I want to choose the food I will eat. I want to buy locally, and I want to support local rural economies so that the carbon emissions footprint of transporting the food I eat in my country will be reduced. I want to eat meat from animals that have been humanely raised and slaughtered rather than from animals that are cruelly kept in filthy and cramped quarters. There has been no strong case made that small processors are a danger, and yet large processors are involved in every food safety news story I see. (Why, still, do not federal inspectors have the power to stop slaughter at major plants if they see something bad?) The state equal-to system, which is the licensing under which many small processors like Belgrade Meat Center operates, has the built in safety that the meats are marketed in state only. And, my desire to provide myself and my family with healthy, wholesome local meats is an important part of the fight against obesity in our nation. This harsh and unfair proposed set of new rules is not beneficial to small, economically and environmentally thoughtful companies, and until another solution for testing meat is considered, I want USDA Secretary Tom Vilsack to know that I am opposed to these rules. They run exactly counter to the USDA's much ballyhooed local foods "Know Your Farmer, Know Your Food" campaign.

Rhodes, Suzette

From: miachic7@yahoo.com
Sent: Saturday, May 29, 2010 10:07 AM
To: Draft Validation Guide Comments
Subject: Message from Internet User - Small Scale Slaughterhouses

Im contacting you to share that Im against extensive regulations that would put small scale slaughterhouses out of business. Im very passionate about our family having access to grass fed beef from local farmers. If safety precautions are put into place that would allow large scale, inhumane slaughterhouses to bring in large quantities of profit and put small scale slaughterhouses out of business, our family would not be able to receive the healthy, grass fed, organic, free range meats that we currently do from our local farmers and producers.

Please consider the small farmers, the local farmers, and the smaller operations when making these decisions. Our health in America is already in crisis because of our lack of nutrient content in our foods...please dont steal and strip away the access that we do have to these healthier foods, healthier options, and our ability to support local farmers in their desire to provide us with these things.

"Rather than scaling down the regs to accommodate small-scale or artisan processors, the regs just put a whole lot of small-scale slaughterhouses out of business. Now the USDA has proposed changes in the works that will make it even harder to be a small-scale processor.

In other words, if these proposed regulations pass, your beloved grass-fed beef farmer will most likely have to send his cattle to an inhumane, nasty, industrial slaughterhouse before passing the meat on to you."

Rhodes, Suzette

From: Howard Muse [dblhnjr@yahoo.com]
Sent: Thursday, April 15, 2010 8:40 AM
To: Draft Validation Guide Comments
Subject: HACCP System Validation

Dear Mr. Almanza:

We, Howard and Helen Muse, respectfully submit 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 as well as the other producers and 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. We 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.

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.

We appreciate the chance to comment on the Draft Guidance on HACCP System Validation.

Thank you for your time and consideration,

Sincerely,

Howard and Helen Muse
Concerned citizens, producers and proponents of locally produced meat and vegetables.

Rhodes, Suzette

From: Rosemary Forester [rosemary@easystreet.net]
Sent: Friday, May 28, 2010 9:52 AM
To: Draft Validation Guide Comments
Cc: Chrissie and Koorosh Zaerpoor
Subject: HACCP for small and very small USDA-inspected plants

To Whom It May Concern:

Re: Proposed changes to HACCP for small and very small USDA-inspected plants

Question: What are we trying to accomplish ? Where do the prompting issues occur ?

Records tell us that it is in the large USDA-inspected plants that meat safety issues occur. No longer can we even trace the origins of the meat that we combine in one package. The meats that go out from the large plants could potentially poison thousands of people.

A history of excellent safety records tells us that the safe plants are the small and very small plants. Common sense tells us that one size does not fit all and that it would be silly to require small and very small plants to be treated in the same manner as large. Safety processes and process control parameters are already in place in small and very small plants.

In this day and age of economic struggles in our country, it behooves us to think carefully and apply our common sense. What is the point of putting small and very small plants out of business when the issue being addressed stems from the large sized plants ?

The USDA has a responsibility to keep a clear head and look at the tremendous value of small and very small plants ... our local economies, excellent safety records at the small and very small plants and the gift of local healthy food for consumers.

Let us keep our end goal in mind. Let us not get caught up in rules for situations that don't apply.

Thank you.

Rosemary Forester
16580 Maple Circle
Lake Oswego, OR 97034

Rosemary Forester

Rhodes, Suzette

From: Nicole Wheatley [elairiana@gmail.com]
Sent: Thursday, May 20, 2010 11:22 AM
To: Draft Validation Guide Comments
Subject: Proposed new FSIS rules

I am writing to urge you strongly to reject the proposed changes to the FSIS rules for inspections.

As someone who regularly purchases local, sustainably raised meat from farmers in my area, I am dismayed to hear that these changes will make it nearly impossible to continue buying healthy, wholesome meats. Isn't the USDA supporting local farmers? Your "Know Your Farmer, Know Your Food" campaign leads me to believe that the USDA should support small, local farms and farmers. If you enact these new rules, small processing facilities will be put out of business and consumers will be unable to purchase meat from local, humanely raised and slaughtered animals.

I strongly believe that supporting local, rural farmers is key to both economic strength and good health. We have an obesity epidemic in this country, and a large part of that is due to the movement away from eating what is raised locally. We do not need more overprocessed, supplemented foods in our markets.

There has been no evidence that small processing plants pose a danger to the public health; on the contrary, every case of recalled meats and dangerous foods have come from large scale processing plants. The USDA inspectors do not even have the authority to shut down slaughter at plants where they witness a problem! Additionally, the state equal-to system is designed to be safe, as the meats are only sold within the state.

Please, do not enact these new guidelines. If they are enacted and we can no longer purchase meat that lives up to our standards we will have to become vegetarians in our household. We refuse to buy meat from major processors because it is not safe, it does not taste good, and it is not raised in a way that meets minimum standards for decent treatment of animals.

Thank you.
Nicole Wheatley
Minnesota

Rhodes, Suzette

From: erin.kinzel@bethelcollege.edu
Sent: Tuesday, June 01, 2010 3:10 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - HACCP requirements

In the past months I have been educating myself about the food I eat. As a result, I have been attempting to purchase as much of my food as possible from local growers and suppliers.

One of these local suppliers is a great butcher shop close to my home. They get their meat from local farmers - it is grass fed, hormone free meat. In my opinion, this is the best choice I can make for my family, for the environment, and for the people who make a living by supplying the meat.

I was appalled to read an article today <http://www.foodrenegade.com/save-small-scale-slaughterhouses#more-1900> about the possible new HACCP requirements. If it is true that this could jeopardize my local butcher shop, I implore you to reconsider!! Please take small-scale operations into account as you consider how to make food safe for consumers. The work you do is so important, and I would hate for it to lean towards accommodating large-scale slaughterhouses and leaving the little guys out in the cold.

More and more consumers are beginning to care where and how their food is processed, and are demanding local options. I am one of them, although I never imagined I would be. If my local butcher is forced out of business I'm not sure what my options will be. Please don't force us to try and go vegetarian! : My husband would NOT be happy with me, but honestly, I don't know if I can go back to purchasing meat from anyone other than a local grower/supplier.

Thanks for taking a moment to consider my viewpoint.

Sincerely,
Erin Kinzel
Elkhart, Indiana

Rhodes, Suzette

From: Tara [tmooney75_75@yahoo.com]
Sent: Friday, May 28, 2010 3:17 PM
To: Draft Validation Guide Comments
Subject: Comments to HACCP Regulations for Small-Scale Slaughterhouses

To whom it concerns,

My home is host to a small-scale meat and dairy farmer who delivers product to my neighbors on Saturday afternoons. The beef is grass-fed and organic, the cheese comes from grass-fed sheep or cows, the chickens are free-range and pastured in small flocks. The quality of the meat is consistently far and above anything I could obtain from a big-box grocery store, where the meat comes from CAFOs that are riddled with disease and where the meat has to be irradiated before it can be sold. I appreciate that these small farmers exist in my area, and I can assure you from the increasing number of iceboxes on my front porch every week that the demand for these healthy, local and sustainable products is growing exponentially. I also know that these farmers struggle to meet demand already and face a real challenge in finding processing plants that are committed to the same principals of safety, health and humanity.

I understand that the USDA is considering increasing the HACCP regulations which have already put a number of small-scale slaughterhouses out of business. I STRONGLY URGE that you reconsider whether the safety regulations that you are now considering are appropriate in the context of a small operation that caters to local organic farmers. Extreme precautions must be taken in the large-scale concentrated animal feeding operations which by their nature breed disease, and where the animals are fed toxic substances to keep the bacteria at bay. But imposing the same standards on small operations where the meat is not exposed to the same disease and chemical treatment is not only unnecessary, but it may in fact reduce the quality of the product and will be impossibly expensive for the processors who process the very product that I and others like me insist upon feeding to our families. By attempting to make food more safe, you will leave no choice to us but the very foods that are unsafe and have brought about the need for such safety regulations in the first place, from large, dirty CAFO operations.

We do not in any way mean to suggest that small-scale meat processors are against safety standards. In fact, the clear danger from CAFO meat is precisely what has caused the rise in the number of small-scale processors for organic and pasture-raised meat, as consumers opt out of unsafe food. We go to small scale farmers and processors because the food they provide us is already safe. Please do not put them out of business with onerous and redundant safety measures. Impose the safety regulations where they belong - on the large scale concentrated animal feeding operations that are systematically and consistently making us all sick.

Thank you for your attention.

Sincerely,
Tara Aaron

Nashville, TN

Rhodes, Suzette

From: Dean Koyanagi [dkoyanagi@gmail.com]
Sent: Monday, April 19, 2010 8:17 AM
To: Draft Validation Guide Comments
Subject: USDA regulation comment: FSIS-2008-0025

Dear FSIS,

Thank you for all of your efforts to develop and enforce food safety practices across our nation. As a beginning farmer attempting to start a small farm in upstate NY, it is a daunting task to find a way to make our operation financially sustainable in these difficult economic times. While I whole-heartedly agree with the intent and purpose of this regulation, the increased burden of reassessment on small slaughter house operations simply eliminates their ability to exist.

Our farm has NO local access to large processing facilities, but have several excellent small operations that are barely hanging on as it is. I would guess that they fall into your "very small" category. While 2,856 of these "very small" facilities may be a lot to inspect and regulate. For small farmers, it is a frighteningly small number. I have heard that two of our local operators plan on closing their doors should this regulation go into effect for their sized facilities. As I understand the rule, through reading the regulation and discussion with fellow farmers, this one-sized fits all approach to regulating food safety simply eliminates them. It is already a struggle for us to find a slaughter date for our animals with so few small facilities still in existence, and should these two operations in our area close, we believe we will be forced to cease raising livestock as part of our farm. Animals are a key component to our integrated (and transitioning to organic) farm, but without these small local processing facilities, our farm's business plan is no longer viable.

Thank you for considering the impact you have on our farm in your deliberations,

--

Dean Koyanagi
Tree Gate Farm
1401 Mecklenburg Rd
Ithaca, NY 14850
dkoyanagi@gmail.com
cell 607.227.8797

Rhodes, Suzette

From: Keil Mueller [KMueller@stollberne.com]
Sent: Thursday, May 27, 2010 12:44 PM
To: Draft Validation Guide Comments
Subject: USDA's proposed changes to HACCP

To Whom It May Concern:

I write to comment on USDA's proposed changes to the Hazard Analysis and Critical Control Point (HACCP) food safety plan. As a citizen who strongly prefers purchasing meat from small-scale, local farmers, I am extremely concerned that -- if adopted -- the changes to HACCP will make it even more difficult for me to purchase the meat that I choose to consume. Small farmers rely on small meat processors. They typically are unable to have their animals processed by large processors. And, even if they were, shipping the animals hundreds or thousands of miles to be processed, and then shipping them back to be sold, eliminates the ecological and environmental benefits of maintaining a local food chain.

Small meat processors already have been set back by existing HACCP requirements. At present, the number of small meat processors is not sufficient to meet demand. More consumers wish to purchase local meat from small farmers, and more small farmers wish to provide meat to this growing market segment. But so many small meat processors have closed, that there often is a long wait for small farmers to have their livestock processed.

USDA's proposed changes to HACCP will exacerbate this problem. I urge USDA to consider the effects of the proposed changes on small meat processors and to give serious consideration to revising the proposed changes to prevent adversely impacting these small processors. A one-size-fits-all approach to regulating meat processors (both small and large) is not necessary to protect Americans' health and, in fact, will harm Americans' health by preventing those who wish to find non-industrial meat sources from doing so.

Very truly yours,

Keil Mueller
kmueller@stollberne.com

STOLL BERNE | 209 SOUTHWEST OAK STREET
STOLL, STOLL, BERNE, LEITCH & SINGMASTER P.C. LAWYERS | PORTLAND, OR 97204

TEL (503) 227-1600 FAX (503) 227-6840 www.stollberne.com

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