

## White, Ralene

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**From:** Andres Moreno [Andres.Moreno@EYC.COM]  
**Sent:** Wednesday, May 05, 2010 1:24 PM  
**To:** Draft Validation Guide Comments  
**Subject:** USDA Proposed Regulations will Hurt Small Meat Processors

Dear USDA,

I am very concerned that the proposed regulations for meat processors will affect small operations disproportionately. I find this specially problematic because:

- Without small processors, it will be very hard to find ground meat that is not the result of an industrial process which results in a blend of product of varied provenances. It only takes one mistake by one of many suppliers to have a serious impact on the quality of the final product, especially since some of the producers are outside of the U.S. and have only nominal compliance with USDA regulations
- There is no evidence that small operations are making people sick. I would much rather buy chickens from Joe Salatin than from Tyson: I believe that the best way to avoid tainted product is to develop a relationship with a local farmer or butcher—there is no better way to quality
- Industrial operations are not sustainable: CAFOs and technology-based approaches are not working. It would be much better to return to a system where locally sourced foods (including meat) are widely available. The burden imposed on small operations by the proposed regulations will move the country in the opposite direction.

Thank you for your consideration.

Best regards,

Andres

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**Andres Moreno**  
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Correspondence and office address: EYC USA, 6200 Baker Rd, Eden Prairie, MN, 55346, USA



Think Green - please do not print this email unless necessary.

## White, Ralene

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**From:** Barb [ellerb@mlecmn.net]  
**Sent:** Friday, April 30, 2010 12:04 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Comments Draft Validation Guide  
**Attachments:** Barb Eller.vcf

USDA: As a livestock producer who depends on the small meat processors in my area, I am concerned about the draft validation compliance guide because it will definitely hurt small meat processors. The new validation systems raise costs significantly for processors, either driving them out of business or passing new costs onto small farmers and local consumers. These changes would severely impact my farm and make the growth of local and regional food systems even harder. I am a small farmer who markets meat locally via farmers' markets, local food coops, institutions, and groceries. I depend upon a small processor now 40 miles from the farm who provides MN Inspected/USDA equivalent processing. Already the costs of transportation and inspected processing are high and the additional costs of the proposed compliance guide would drive me out of my local markets.

Safety issues are important to me, however, the majority of the food safety violations occur in the large meat packing facilities where hundreds of carcasses are batched. I and most small farmers like me, process one animal at a time at a small processor who takes appropriate care under inspection to ensure the quality of our meat--our business depends on this. We have appropriate tracking systems in place to ensure trace-back and in all my years of farming selling both inspected and custom processed meats I have never had a food safety violation originating from my local processors or me.

Provide exceptions for small processors or drive small farms and developing local food systems out of business.

Barbara Eller  
Eller Family Farm  
12722 350th Street  
Onamia, MN 56359  
320-532-4946/1-800-323-1361  
<http://www.ellerfarm.com>

**Riley, Mary**

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**From:** David & Peggy Webb [localnourishment@gmail.com]  
**Sent:** Tuesday, April 27, 2010 8:42 PM  
**To:** Draft Validation Guide Comments  
**Subject:** New FSIS Interpretation

Please reconsider the micro testing of all meat suppliers as the new interpretation of HACCP regulations. It will put the few small-scale producers in our nation out of business, provides no improvement to current safety protocols and pushes more meat through an already overburdened industrialized food system.

The current procedure, in place for the last 12 years, has proven its value for small scale producers. The foodborne illness epidemic is not coming from local, small-scale artisan producers, but from largely unregulated industrial packers. USDA has indicated their desire to assist local foodsheds, but this interpretation works directly against that goal.

A better idea: Leave the current recommendation in place for small-scale producers. When there is a consistent pattern of failed safety testing, implement the new micro testing for that facility. Determine the cause of the failure and correct it.

Please don't limit my family's access to clean meat by requiring financially onerous and unproven micro testing of my local small-scale producers!

Thank you for your consideration,  
Peggy Webb

## **White, Ralene**

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**From:** stephanie.skelly.ga@gmail.com  
**Sent:** Wednesday, May 26, 2010 7:30 AM  
**To:** Draft Validation Guide Comments  
**Subject:** Message from Internet User - New HACCP Recommendations

I am deeply concerned about the new regulations that may put my local meat processors out of business. It seems on many levels, the government is putting tighter restrictions on smaller producers of food and other items, not recognizing that the main problems of contamination in the case of food, especially generally comes in HUGE batches from the industrial MEGA processing plants.

Closing down these local plants with over regulation will NOT accomplish food safety, but will do the opposite. It will force those of us who have found alternatives to the oversized, unsafe, mega-food processing plants out of the market or back to the big boys.

It also takes our money out of local hands and local economies. This isnt good for anyone except maybe the big boys again.

Please, do us all a favor and consider the cost, expense and necessity of levying these inspection requirements on smaller processors. I want to use my smaller local processors!!!

**White, Ralene**

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**From:** Erin Klein [erintklein@gmail.com]  
**Sent:** Tuesday, May 25, 2010 9:40 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Please save the small-scale slaughterhouse

Dear whom it may concern:

I find the the proposed changes to the HACCP highly alarming and urge you to carefully examine any wording or intent that would prevent small-scale slaughterhouses from continuing to provide locally processed meat to their customers. While I appreciate the thinking behind requiring meat-processing facilities to test for pathogens, I believe a federal mandate ordering on-site labs and frequent, expensive testing is not only excessive but dangerous.

I couldn't be more pleased at the recent selection of local meats and foods that are available and the idea these options could vanish into bureaucracy both saddens and angers me. Farmers and ranchers, especially those that choose a grass-fed diet for their animals should be given a choice as to where to send their stock for slaughtering. Several ranchers have explained to me that the inhumane practices of large, industrial slaughter houses are extremely unappealing to them and their customers. By keeping that arm of their business local they are also drastically reducing the carbon foot-print of the meat they produce. All of these things matter to me and dictate where I spend my dollars.

The landscape of America's eating habits is rapidly changing and a 'one-size fits all' approach no longer fits the current industry or the consumer demand. Space must be made for community-based localized plants within the US agricultural regulatory structure.

Thank you for opening this discussion to the American public and taking our opinions into serious consideration.

Sincerely,

Erin Klein  
2608 Dunbarton Drive  
Austin, TX 78723

**White, Ralene**

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**From:** Erin Lewis [erin.lewis.pt@gmail.com]  
**Sent:** Tuesday, May 25, 2010 11:00 PM  
**To:** Draft Validation Guide Comments  
**Subject:** new regulations

To Whom It May Concern:

I strongly oppose the new HACCP regulations. My family thrives on the local, grass-fed beef we are able to purchase in our area. One of the main reasons we love it so much is because the farmer uses a small-scale processor. The new regulations would put that processor out of business. The community-based meat processing industry is making a comeback (thus creating jobs) because of the recent increase in demand for local, grass-fed meats. As you well know, most of these processors cannot afford their own labs and microbiology staff.

I would urge the USDA find a way to split the mega-processors from the community-based localized plants within the regulatory structure. Small processors do not put millions of people at risk when something is contaminated. They should not be penalized for the errors of the mega-plants. These new HACCP requirements are going to create serious hardship in a portion of the industry that is growing for the first time in years. I believe the USDA is going to have a serious embarrassment on its hands if these regulations are put into effect.

Please protect my family's choice to purchase locally-raised, pasture-fed, and humanely-slaughtered meats. Thank you for your time and attention.

Sincerely,

Erin Lewis  
Arkansas resident

## White, Ralene

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**From:** al@genatural.com  
**Sent:** Tuesday, May 25, 2010 3:14 PM  
**To:** Draft Validation Guide Comments  
**Cc:** lauren.gwin@oregonstate.edu  
**Subject:** Please reconsider plan on table

To Whom It May Concern,

We are not meat processors; but we do represent a market of consumers who refuse to buy meat products that come from factory farms and instead rely on our ability to source meat products that are fed and housed naturally, butchered humanely, and are from LOCAL resources.

The new proposed rules would eliminate one of our key local resources and seriously affect negatively another. Both do business here in Northern California.

Please re-consider the new rules of the proposed 'safety plan' so that they are suitable to small producers, whom are not the culprits in this particular area of food/ag.

Real change would be to question the long-term sustainability of "THE FACTORY FARM".  
'This farm' owned and operated by the "big 4" has jeopardized the health of our food system, not the small regional butcher-

Please wake up before these small businesses are run out of town-

Sincerely,

Al Baylacq, Partner  
Good Earth Natural Foods, INC.  
1966 Sir Francis Drake Blvd.  
Fairfax CA 94930  
415-454-0123 Ext. 222  
415-744-1809 Computer Fax

## White, Ralene

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

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

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

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

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

## **White, Ralene**

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**From:** Mike Bass [mikebass@inbox.com]  
**Sent:** Wednesday, May 26, 2010 2:36 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Concerned about small, local slaughterhouses

I recently travelled around my town looking for locally produced meat and was unable to find any. "Go to the slaughterhouse if you want it local" I was told. Amazingly, just 10 minutes out of town there is a wonderful abattoir hat, unknown to me, has been selling excellent local beef to area restaurants for years. Normal foodies can purchase steaks, ground beef, and other cuts as well. Consumers don't know about places like this b/c we are too busy going to Wal-mart. Luckily, the trend to return back to locally produced food is becoming very popular again.

Please be sensitive to these smaller, local slaughterhouses when constructing legislation that may be cumbersome to their operations. I can tell you that our locals take food safety very seriously. "One-size-fits-all" legislations are not only unnecessary, they are insincere to the real goal: allowing customers to safely choose and consume the food of their choice.

Thank you  
-mike bass  
Lafayette, LA

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**White, Ralene**

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**From:** harrietsmama@yahoo.com  
**Sent:** Wednesday, May 26, 2010 12:34 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Message from Internet User - small scale slaughter houses

**Please do whatever can be done to save the small scale farmer-serving slaughter houses. The only way I can eat meat, and I desperately need to for my health, is to work with a farmer who raises corn-free beef, and uses a slaughter house that uses no corn-derived washes on their machinery. This means working face to face with my farmer and my slaughter house.**

**The answer to the contamination problem is not bigger, more controlled environments. It is smaller, more personally invested environments where the people who work there are invested in what they produce.**

**Factory farming is when contamination became a widespread concern. When farming is small, you can go see what farm you want to buy from. This is not an option, or even a desire, for everyone. But please dont set regulations to the point that those of us who are willing to do the work to seek out this type of farming are unable to reap the benefits.**

**Sincerely,**

**Heather Mae Hall  
anaphylactic corn allergy**

## White, Ralene

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**From:** T Gardner [tmmnicole@hotmail.com]  
**Sent:** Wednesday, May 26, 2010 9:28 AM  
**To:** Draft Validation Guide Comments  
**Subject:** Proposed HACCP Changes

I am writing concerning the proposed HACCP changes which would make excessive testing for E. coli mandatory for slaughterhouses.

From what I understand, the purpose of the changes is to ensure that plants have systems in place which effectively prevent food safety problems. It is also my understanding that the proposed changes will be very costly for slaughterhouses to implement.

The laws should be changed – certainly – but they should be changed to outlaw the practices which cause contamination in the first place. It should be mandatory to raise animals on pasture with access to grass. It should be illegal to overcrowd animals and to allow them to stand in their own waste matter. Implementing these sensible farming practices would virtually eliminate E. coli contamination all-together with the added benefit of a more nutritious and flavorful end food product. The excessive tests called for by the new proposed changes would, therefore, be rendered unnecessary.

Respectfully submitted,  
Tammy Gardner

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## White, Ralene

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**From:** Jan Myers [jan@janmyers.com]  
**Sent:** Tuesday, June 08, 2010 7:51 PM  
**To:** Draft Validation Guide Comments  
**Subject:** Public Comment - Proposed rules re Irradiation, etc.

I want to comment about the new proposed rules for meat packers to require them to use irradiation which will cost thousands of dollars to set up and several thousand every year. This will drive small farmers who raise grass-fed hogs and cows out of the market. The large butchers who sometimes do not have time or space to treat animals humanely will be favored, as they can afford the irradiation and maybe need it. The Farmers Market small farmers and other small farmers who are selling to food co-ops have regular inspection and testing, and licensing and certification. They already pay for that.

We have backed the food co-op movement, which encourages us to buy locally, and to cut down on use of oil and gas. The grass fed meat is much more healthy, and most large producers do not bother to change their ways or go into anything that will cost them a few cents of profit. PLEASE DO NOT APPLY THESE RULES TO FARMERS WHO HAVE SMALL FARMS. There are other branches of government which do not apply rules across the board, say for instance if an employer has less than 500 employees some rules do not apply because it is not practical.

Let people help the environment by eating grassfed meat and buying from local small farmers. Don't let big business set up barriers to drive small businessmen and farmers out of business. Thank you.  
Janice Myers, 1448 Eleanor Avenue,, St. Paul, MN 55116.

## White, Ralene

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**From:** Steph [smhall@unmc.edu]  
**Sent:** Monday, May 03, 2010 6:18 PM  
**To:** Draft Validation Guide Comments  
**Subject:** small meat processor

Dear Committee,

I am a very concerned supporter of small meat processors regarding the passing of new FSIS regulations. It is very important to my family and I to have the alternative option to purchase meat from around the area. I want to be able to continue this practice so I can enjoy both the exemplary quality of the meat as well as the knowledge that I am helping money stay local.

With the new regulations that you are passing, many small businesses would not be able to continue functioning due to extra costs. I urge you to consider the importance of keeping local farmers and processors as valid competitors in the meat market, and important contributing members to the quality of food at my family's table.

Thanks for your consideration on this matter.

Stephanie Hall  
PA-S

**Riley, Mary**

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**From:** Cara Tyrrell [tyrrellc123@yahoo.com]

**Sent:** Wednesday, April 21, 2010 10:06 AM

**To:** Draft Validation Guide Comments

I think the government has enough things to worry about than the "organic meat and where it is processed" issue. What about giving illegal aliens as much (or more) benefits and money than taxpaying citizens get? Another idea would be looking into the welfare system. Between full medical, food stamps, HEAP, tuition, child care, and a monthly allowance, these people are bringing home more money than me. It was recently brought to my attention the President (in all his wisdom) gave people on welfare a cell phone. Now that's a bright idea. There is absolutely NO incentive to work in this country. Why does this government insist on giving to the people who refuse to work and take away from the people who are supporting them?

I am one of the people who choose to eat organic meat because this government allows terrible things to be put in our food like chemicals, growth hormones, etc. Shame on you. Stop worrying about getting a "piece of the pie" and concentrate on rebuilding the country so our children will not be in the same situation my generation is in.