

Riley, Mary

From: jtooke@usfood.com
Sent: Tuesday, April 27, 2010 10:55 AM
To: Draft Validation Guide Comments
Subject: Message from Internet User - Comments on HACCP Systems Validation Draft Guidance

1. Use of Indicator Organisms general: we were told by one FSIS District Office that negative results from testing for the presence of indicator organisms is NOT adequate proof of the absence of E. coli O157:H7. Subsequently our HACCP plan was considered invalid and part of our operation was shut down for a period of time. That determination was later over-ruled upon appeal to Washington DC. However, it is clear that the USDA preference is testing all finished product for O157. This draft allows testing for indicator organisms to validate intervention steps and prerequisite processes. Is this an indication that FSIS now considers the absence of appropriate indicator organisms as evidence of the absence of E. coli O157:H7?
2. Use of Indicator Organisms to validate an intervention step: we cut only sub-primals that have already gone through an intervention step. Consequently the incoming bacterial load is very low- generally so low as to preclude another 1-log reduction from our own additional intervention steps. How then can this be used as evidence that our process is working properly?
3. Validation examples: Thank you for providing validation examples as attachments to the draft guidance. However, there are no examples for non-intact-not-ground beef products. Does the USDA intend to provide examples?
4. Validation of existing processes: you noted in bold type that establishments with existing HACCP plans will still need to gather data to validate interventions and GMPs. Considering the cost of sampling to the industry, has the USDA given thought to using historical data for example, no recalls or outbreaks in last year as evidence that the HACCP plan is working properly?
5. Uniform application: we have plants scattered across the U.S. We have found that acceptance of validation steps varies dramatically from one district to the next. What steps is the USDA taking to ensure their inspectors understand and apply HACCP Systems Validation enforcement uniformly and fairly?
6. HACCP reassessments: related legislation is being proposed that when HACCP plans are reviewed annually, all decisions, including a decision not to change anything, must be justified. We can easily foresee a scenario where an inspector will insist that new validation studies be done annually to justify not changing our HACCP plan. Will the USDA address this issue?
7. Use of data across multiple facilities: you state that data gathered in one facility cannot be used as the second part of a validation study in another facility. We believe this unnecessarily adds expense to the process. If the same machinery and chemical are used as an intervention step on the same type of meat from the same major suppliers, and parameters such as dwell time, temperature, and pH are kept within acceptable manufacturer specifications, why is it necessary to perform extensive additional testing?
8. Finally, we believe this document is difficult to find on the USDA website, thereby reducing the number of comments received. We request that it be reposted and another 60-day comment period be granted.

Thank you,

Jay L. Tooke
President
Stock Yards Meat Packing Company
716-824-4900



Farmers' Market Federation of New York

117 Highbridge St, Suite U-3

Fayetteville, NY 13066

315-637-4690

315-637-4691 (fax)

www.nyfarmersmarket.com

Form Letter 12

May 25, 2010

Dear USDA,

In New York State, in fact across the country, there is a strong and growing demand for locally raised foods. We are finding an ever-expanding interest in farmers markets, as consumers search out sources of farmers offering their locally raised foods for sale. Meat produced and slaughtered locally is the fastest growing segment of agriculture at farmers markets today. Consumers crave the quality of locally raised meats, seek to know the producers of their foods and develop a trust in the safety of the foods they are buying.

The Farmers Market Federation of NY supports our state's livestock producers in their efforts to produce a high quality and safe supply of meat for our markets' consumers. We know that livestock farmers work very hard to produce a high quality, great tasting product and rely on small scale, local slaughterhouses to process their animals for retail sale. The severe shortage of meat processing facilities in NY State has reached epic proportions and is being addressed by multiple agencies here in New York. These regulations will hamstring those efforts and further reduce choice for our producers.

Because there is that direct link between the farmer and his consumer, farmers are extremely cautious to safeguard that relationship by ensuring both the quality and the safety of their meats. The slaughterhouses that are currently operating are following all food safety mandates and have consistently offered a clean, safe source for our farmers and consumers.

Proposed regulations requiring slaughterhouses to further test each meat product will devastate this growing and vital industry. The costs of annual testing of each and every meat product will be beyond the ability of the small scale, local slaughterhouses to bear. Costs must be passed on to farmers and consumers in their quest to remain solvent. Farmers, unable to bear the costs will be forced to limit the variety of meat offerings, and many will cease production completely.

The result will hurt all sides of the local food system.

- Many slaughterhouses will be forced to close their doors as the costs of compliance with the proposed regulations is out of scale with the size of their operation or the ability of their farmers to bear.
- Livestock farmers will lose the few slaughterhouses available to them, new operations will be discouraged from opening despite the efforts of the state and Extension to bring new slaughterhouses on line, and the local retail meat industry will be shuttered. Many will be forced back into less profitable options, while others will simply be forced out of business.
- Costs passed on to consumers will result in meat prices that are out of reach of many consumers, making direct marketed meat less available to consumers and less profitable to farmers.

The result will be the wholesale slaughter of an industry.

These onerous regulations come at a time when interest in locally raised foods is at its highest. Farmers are finding that direct marketing of their meats is providing a revenue source that is helping to sustain their farms. But this regulation will kill, not only the producers of direct marketed meats, but will negatively impact the entire local foods movement which has brought new hope to farmers who have turned to direct marketing as a revenue source to maintain their farms and their families.

The Farmer's Market Federation of NY, on behalf of the hundreds of markets and thousands of vendors represented at these markets stands in opposition to these regulations and regrets the inevitable loss of business which will result from such regulations.

Cordially
Bob Buccieri
Board President

Our mission is to support and promote the viability of farmers' markets through innovative services, programs and partnerships that maximize the benefits of markets to sellers, buyers and communities.

Rhodes, Suzette

From: Jim Bjork [jwbjork@hotmail.com]
Sent: Wednesday, May 12, 2010 4:39 PM
To: Draft Validation Guide Comments
Subject: draft validation compliance guide

I am concerned about the draft validation compliance guide because it will hurt small meat processors. The new validation systems would raise costs significantly for processors, driving them out of business or passing new costs onto farmers and consumers. These changes could severely hamper the growth of local and regional food systems.

*Jim Bjork
apprentice butcher
Minneapolis, MN*

Hotmail is redefining busy with tools for the New Busy. Get more from your inbox. [See how.](#)

White, Ralene

From: t.guyette@comcast.net
Sent: Friday, April 30, 2010 11:31 AM
To: Draft Validation Guide Comments
Subject: Verification for Local butchers and small meat operations

FSIS Administrator Al Almanza

1) SLOW DOWN. Many small farmers who rely on local processors probably don't even know about this proposal. Since it will affect them dramatically, small meat producers need to be solicited for comment.

2) ANALYZE IMPACT. USDA Deputy Secretary Kathleen Merrigan has said that she doesn't think added costs from these FSIS regulations will be burdensome to small processors and/or farmers. But does she know for sure? Has an economic impact analysis been conducted for these FSIS regulations? Shouldn't we do that first before proceeding?

3) CREATE MORE EXEMPTIONS FOR SMALL AND MEDIUM-SIZED PROCESSORS. The BEST way to create a safer food system is to protect and propagate small- and medium-sized processors, not to make them less profitable. After all, a decentralized food system is an insurance system against big outbreaks. Small processors can't produce enough meat to necessitate a 20 million-pound national recall of hamburger, so we should strengthen our small, local food systems, not undermine them.

Localization is the key to cost effective and healthy meat products.

Tom Guyette

Form Letter 15

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

Re: Draft Guidance on HACCP Systems Validation

Dear Mr. Almanza,

I am writing to respectfully submit comments regarding the Draft Guidance on HACCP Validation that was publicly released on March 19, 2010.

I operate a meat processing facility in Illinois that has functioned under HACCP for many years. We realize that producing safe foods is the utmost concern of FSIS and it is our first priority also. We have produced safe, wholesome food products for our customers for several years, even before HACCP was implemented. I honestly don't believe that the additional HACCP Validation will result in any changes to my products and the processes to make them. We are using FSIS regulations, Appendix A, Appendix B and Peer-reviewed Scientific Supporting Documentation to validate my current HACCP plans.

The Draft on HACCP Validation will require me to do an enormous amount of microbial testing. I fear that as it is currently written it will not be feasible for me to be able to afford all the costs and the manpower to complete the validation. I have several HACCP plans with many, many products. I estimate that the costs for my company to comply for just the initial step could be well over \$100,000. Not to mention the additional annual costs of ongoing validation. I have spoken with several of my fellow processors and we feel this will devastate the small meat processing industry throughout the country. Scores of small plants will be forced to close or do custom exempt work only.

Whereas I appreciate the opportunity to submit my comments, I ask you and FSIS to reconsider the proposed draft and consider a working with the industry in a manner that is a cost-effective means to produce to produce safe, wholesome foods by all meat processing establishments. I am certainly not opposed to food safety, but I am opposed to this draft that will cause economic devastation to the industry.

Respectfully submitted,

Jenni Behmann
President
Behmann Meat + Proc.

May 1, 2010

Docket Clerk, FSIS
Room 2-2217
5601 Sunnyside Avenue
Beltsville, MD 20705

Re: Comments – Draft Guidance on HACCP System Validation

Dear Mr. Almanza:

We, Hillsboro Knights of Columbus, use state-inspected products produced by Paris Frozen Foods, Inc. of Hillsboro, Illinois extensively in many, if not all of our fundraisers throughout the year. Hillsboro is a small rural community of nearly 6,000 in Montgomery County, Illinois.

Paris Frozen Foods is our local state custom meat processing plant and produces safe, wholesome products for us and our community. It has served our county of 30,000 for more than 50 years. They are an asset to our efforts and support our endeavors when asked in many ways.

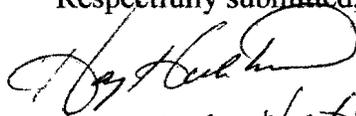
With the enormous amount of microbial testing in the new HACCP validation plan, we fear they will be forced to go custom exempt only or close their doors altogether, which leaves us with no outlet to buy product. This in turn puts a serious damper on our traditional fundraising efforts, which have always been food based. This will completely devastate our local fundraising ability. Any product brought would need to be transported in from at least 60 miles away, adding to our costs and time and taking dollars out of an already devastated economy. **(Presently Montgomery County ranks fourth in the state in unemployment levels out of our 103 counties.)**

We appreciate the opportunity to submit comments on this matter. We ask you and FSIS to reconsider the proposed draft and consider working with the industry to produce a more cost effective means to produce safe, wholesome food for our function.

We are not opposed to food safety. We have never encountered a problem with food safety in this regard. We believe small and very small plants that serve individual customers and organizations should, while maintaining clean facilities and producing inspected products under the current plan, be afforded some economic consideration that does not put them out of business.

Their demise affects not only them and their families. It will affect their suppliers and the customers they serve. And in this case, the civic and not-for-profit organizations that depend on their product to help maintain their services.

Respectfully submitted,


President, National Bank
Robby Meyer

Rhodes, Suzette

From: TJ & Debbie Mesler [tmesler@cfl.rr.com]
Sent: Thursday, April 15, 2010 7:00 AM
To: Draft Validation Guide Comments
Subject: HACCP System Validation

As a livestock producer/farmer who depends on the meat industry, our concern regarding process validation in inspected establishments HACCP programs have prompted Sunny Hill Farms to comment our concern. Through communication with our current butcher and other concerned meat processors it has become apparent that initiating systems validation in these establishments would considerably affect our business as well. It is our belief that this will cause many of the federal and state inspected processing plants that we rely on to be forced out of business, or pass the increased cost onto us and ultimately putting our business in financial jeopardy. The loss of income resulting from this will be devastating to Sunny Hill Farms because our business depends on very small and small establishments.

Sunny Hill Farms appreciates the chance to comment on the Draft Guidance on HACCP System Validation. Thank you for your time and consideration.

Sincerely,

Deborah Mesler
Owner of Sunny Hill Farms

E-mail message checked by Spyware Doctor (7.0.0.514)
Database version: 6.14780
<http://www.pctools.com/spyware-doctor-antivirus/>

White, Ralene

From: yellow.gin@gmail.com
Sent: Tuesday, May 25, 2010 9:38 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - new HACCP requirements

In my opinion, the USDA needs to recognize that "one size fits all" inspection no longer fits current industry practice and consumer demand. 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, and then the USDA is going to have a serious embarrassment on its hands. 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.

Rhodes, Suzette

From: Jan Wagner [jwagner@dunkleybennett.com]
Sent: Friday, May 21, 2010 4:19 PM
To: Draft Validation Guide Comments
Cc: 'Joseph Wagner'
Subject: New Rules regarding meat processing

I received the following message from the local farmer from whom I purchase all of my meats. I agree completely with their message and believe that the USDA needs to pay a lot more attention to regulating corporate agribusiness regarding meat safety rather than proposing regulations which will make life much harder on family farmers.

News from the Farm

Hello Friends,

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 potentially make meats from here at Pastures A Plenty and Red Tail Valley unavailable for you to buy. As we understand it, Belgrade Meat Center, our processor, would be required to submit their products (our meats) to as many as thirteen tests per product, costing perhaps \$10,000 per product to initiate and another \$3500 annually to maintain. Consider then the fact that we offer about 40 different processed beef and pork products in addition to all the fresh cuts and you can begin to see the size of the problem. Implementation of these kinds of requirements will shut us down!

Here is what we would like you to do before June 19th:

- Call USDA Secretary Tom Vilsack at 202-720-3631. Tell him that these rules run exactly counter to the USDA's much ballyhooed local foods "Know Your Farmer, Know Your Food" campaign. You will not reach the Secretary. Try to get to someone responsible and leave a message with him/her.
- Submit a written comment. E-mail a message to DraftValidationGuideComments@fsis.usda.gov or mail comment to:

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

Remember to make it personal. This is your government and your USDA. If you eat, you have a right to be heard on agricultural issues. Tell them you want to choose the food you will eat, that you want to buy locally, that you want to support local rural economies, that you want to eat meats from animals that have been humanely raised and slaughtered, or whatever else you feel strongly about. You have every right to do this and you should expect to be heard!

Hints and Tips: Remind them that they have not made the case that small processors are a danger, and that it is large processors that are involved in every food safety news story you see. Ask them why federal inspectors do not have the power to stop slaughter at major plants if they see something bad. Remind them that the state equal-to system, which is the licensing under which Belgrade Meat Center operates, has the built in safety that the meats are marketed in state only. And remind them that healthy, wholesome local meats are an important part of the fight against obesity in our nation.

Thank you for speaking up for farms like ours!

Josh and Cindy Van Der Pol
Jim and LeeAnn Van Der Pol
Terry Van Der Pol
Jan M. Wagner, Esq.
Dunkley and Bennett, P.A.
3555 Holly Lane North, Suite 10

Plymouth, MN 55447
PHONE: 612-339-1290
FAX: 612-339-9545

NOTICE: This is an E-mail (including any attachments) from the law firm of Dunkley and Bennett, P.A. and is covered by the Electronic Communications Privacy Act, 18 U.S.C. Sections 2510-2521 and may contain information which is privileged, confidential, and protected by attorney-client and/or attorney work product privileges. If you are not the intended addressee, disclosure, copying, distribution, or use of the contents of this E-mail is prohibited. If you have received this transmission in error, please destroy it and notify us of our error at (612) 339-1290. E-mail is not secure and may be intercepted by a third party. For this reason, we recommend that any highly confidential communications take place in person, via telephone, or U.S. Postal Service in order to protect your confidentiality. By choosing to send or receive E-mail, you acknowledge that you understand and assume the risks of E-mail.

IRS Circular 230 Required Notice: We are required to advise you that the information in this message is not intended by our firm to be used, and cannot be used, for the purpose of avoiding any penalties that may be imposed under the Internal Revenue Code. Written advice from our firm relating to Federal tax matters may not, without our express written consent, be used by anyone other than the recipient of the written advice.

Rhodes, Suzette

From: coleen thornton [heavensentfoodandfiber@gmail.com]
Sent: Monday, April 12, 2010 7:09 AM
To: Draft Validation Guide Comments
Subject: meat processing

Dear Mr. Almanza:

Heaven Sent Food & Fiber, LLrC (which does not process meat, but has major interest in local foods) 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 the 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.

They currently supply several thousand small meat processors across the United States. They 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.

They 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. 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.

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.

Heaven Sent Food & Fiber appreciates the chance to comment on the Draft Guidance on HACCP System Validation.

Thank you for your time and consideration,

Sincerely,

Coleen Thornton

Heaven Sent Food & Fiber, LLC

cc: Sen. Jim Wilson

Rep. Mike Brown

Rhodes, Suzette

From: H. Douglas Bush Jr. [doug@bush-brothers.com]
Sent: Tuesday, April 13, 2010 6:55 AM
To: Draft Validation Guide Comments
Subject: Comments on Draft Guidance on HACCP System Validation

To: Al Almanza, Administrator, Food Safety Inspection System (FSIS)

Dear Mr. Almanza:

Bush Brothers Provision Company appreciates the opportunity to comment on the recently released document, "Draft Guidance: HACCP Systems Validation".

Bush Brothers Provision Company is located in West Palm Beach, Florida. We employ approximately 25 employees and produce 20,000 pounds of Beef, Lamb, Veal, Pork, and Poultry per week. We have been in business for 85 years.

We are committed to producing safe products for our customers and take great pride in the products we make.

However, we think this draft guidance is overly burdensome to the meat and poultry industry and should be reconsidered in its entirety. Additional guidance is only needed if a food safety benefit is to be realized.

Specifically, we would like to make the following points:

- The document indicates a change in agency policy. Processes and procedures that have produced safe products, and that have been considered validated since the inception of regulated HACCP, would need to be re-validated according to new terms and conditions.
- There are many processes for which validation by microbial testing by individual establishments is neither worthwhile nor necessary. Examples include: processors using Appendix A and Appendix B who have validated that the operational parameters are met, regulatory requirements, and widely accepted and applied scientific literature for which operational parameters are easily applied (i.e. product temperature).
- Many small and very small plants produce a wide variety of products. The resources (both time and money) required to comply could put them out of business. FSIS should seriously consider what improvements in food safety will be made before adding requirements that will impact small businesses in this manner.
- FSIS guidance material is commonly misunderstood in the field and is most often seen as a regulation by field personnel. Validation is an extremely complicated topic and the guidance document shared with the industry can be interpreted in a number of different ways.

We ask that the guidance document be reconsidered and revised to reflect that long-standing and widely accepted practices do not need in-plant microbial testing to be considered validated.

We also ask that the guidance document be written in a way to minimize differing interpretations in the field.

Finally, we ask that you continue to engage the industry in this process.

Sincerely,

Doug Bush
Sales Manager, Bush Brothers Provision Company
Board of Directors, North American Meat Processors Association

Doug Bush
Bush Brothers Provisions Company
1931 North Dixie Highway, West Palm Beach, Fl 33408
www.Bush-Brothers.com | doug@bush-brothers.com
(561) 832-6666 | (561) 832-1460 | (561) 676-9096

 please consider the environment before printing this email

***** The information contained in this e-mail (along with any attachments) is intended only for the use of the individual(s) to whom it is addressed. It is confidential and may contain privileged information. If the reader of this message is not the intended recipient, you are hereby notified that you should not read its contents, and any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received it in error, please immediately (1) delete this transmission and any attachments and (2) notify info@bush-brothers.com to advise us of the error. THIS E-MAIL IS NOT AN OFFER OR ACCEPTANCE: Notwithstanding the Uniform Electronic Transactions Act or any other law of similar import, absent an express statement to the contrary contained in this e-mail, neither this e-mail nor any attachments are an offer or acceptance to enter into a contract, and are not intended to bind the sender, Bush Brothers Provision Company, or any other person or entity.

Rhodes, Suzette

From: memballard@gmail.com
Sent: Wednesday, May 26, 2010 9:05 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - small scale slaughterhouses

The USDA needs to recognize that "one size fits all" inspection no longer fits current industry practice and consumer demand. 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, and then the USDA is going to have a serious embarrassment on its hands. 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.

This does NOT mean that small plants are not serious about food safety. It is because consumers are serious about food safety that they are coming to us, and we need to keep local infrastructure alive in this country. We need an inspection system that recognizes that the small plants do not put either the food economy or millions of people at risk in case of a food safety event.



Pottawattamie County
Local Food Policy Council
Ph. 712-328-5644 Fax 712-328-5770

June 2, 2010

Docket Clerk
USDA, FSIS
Room 2-2127
5601 Sunnyside Avenue
Beltsville, MD 20705
Attn: USDA FSIS Administrator Alfred Almanza

REGARDING: Draft Validation Guide Comments

We feel that the proposed changes to the Validation process will have severe and negative impacts on our local lockers in Southwest Iowa. We urge FSIS to proceed at a much slower and more careful pace in the deliberation of these changes. Possible impacts include the loss of local lockers, a loss of jobs, a decline in local economies, and removing local access to local meat and poultry from our local food system. We feel that this change is contrary to the USDA's recent "Know Your Farmer, Know Your Food" initiative.

These validation guidelines are re-interpreting a regulation that has been in place for over 10 years. HACCP plans have been a regulatory requirement in officially inspected plants since 2000. Validation of HACCP plans has been accomplished by supporting decisions with scientific documentation, ongoing testing and ten years of documentation. During this same time in-plant HACCP Systems have been routinely reviewed by on-site inspection staff and subject to periodic extensive review through Food Safety Assessments. This currently provides significant oversight of a plant's HACCP system. This new interpretation tremendously increases the number of microbial tests that must be conducted. This will not necessarily produce safer food. It is a scientific fact that you cannot test safety into food products.

Members of Council:

**Margarite Goodenow, Chairman, Sharon Oamek, Vice Chairman,
Jens Baake, Virginia Bechtold, Charles Bickel, Lyle Ditmars, Teri Hill, Mitch Streit**

The following details our specific concerns with the Draft Guidance-HACCP System Validation:

1. The cost for a small business to test and validate its CCPs for the large number of unique products produced could be unmanageable for many. Estimates of initial costs for testing for a typically plant that slaughters three species (beef, pork and lamb) and produces 10 substantially different products is \$106,900. Annual costs for ongoing testing have been estimated to be \$31,800 or more. Local lockers in Southwest Iowa can expect the cost to be over \$250,000 the first year and well over \$70,000 in subsequent years.
2. Small and very small meat plants are an important part of the economy of rural Iowa. This new interpretation will surely precipitate the closing of many plants. This proposed rule change is extremely disconcerting and it goes completely against the administration's "know your farmer, know your food initiative," which is meant to support small, local food producers.
3. The manner in which this major regulatory re-interpretation was announced on March 19, 2010 does not follow the same scrutiny as typical regulatory changes. There is no mechanism in place to have this new interpretation reviewed by the Small Business Administration to determine the financial impact on small businesses.
4. Iowa small and very small plants have from one to ten (or more) HACCP plans covering slaughter, raw meat production, cooked products, shelf-stable products and other processes. Each HACCP plan has one or more Critical Control Points (CCPs) that prevent, reduce or eliminate food safety hazards. Each of the CCPs would be required to be validated with the protocols outlined in the draft guidance; this will create insurmountable obstacles for our local lockers. The cost of meeting these requirements would put most or all of our local lockers out of business.
5. Additionally, FSIS has indicated that they will require that all pre-requisite programs, such as plant sanitation, cooler temperature monitoring and pest control programs must be validated under the same protocols outlined in the draft guidance. These programs are numerous and validating these will add substantial costs that again, could put the local lockers out of business.
6. This new interpretation discriminates against small and very small plants that typically process more than one species of livestock and produce a wide variety of products.

Thank you for your consideration of our comments; we will look forward to receiving your response. Please help us support our local meat lockers and abstain from creating these validation changes that will have such negative impacts for our communities.

Sincerely,



Margarite Goodenow
Chairman

Rhodes, Suzette

From: Dawrenda.CTR.Cooper@faa.gov
Sent: Thursday, May 13, 2010 10:06 AM
To: Draft Validation Guide Comments

Docket Clerk, FSIS

Room 2-2127
5601 Sunnyside Avenue
Beltsville, MD 20705

To whom it may concern:

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

I am part of the Oklahoma Food Cooperative. The Food Cooperative makes it easy for people in cities in Oklahoma to buy meat directly from Oklahoma farmers. All of the meat products they sell are processed in locally owned processing plants inspected by the USDA or the Oklahoma Department of Agriculture.

It is our understanding that FSIS is proposing to require that meat processors do a series of expensive tests to validate their HAACP plans. Our local processors indicate that the costs to them would run between \$5,000 and \$50,000/year, depending on the number of their products. This is a prohibitive cost for small locally oriented meat processors, and if this guideline is enacted as a regulation, it will virtually destroy the small processor market. This would put our meat producers out of business, and would destroy the cooperative's business, since over half of our sales are meats.

I am not aware of any problems in food safety caused by local meat processors in Oklahoma. When I read of meat recalls, they aren't coming from small processors, they are coming from giant multi-state processing operations. Laying this new regulatory burden on small meat processors is not called for by the facts on the table. It would cause the destruction of important heritage businesses, that operate in sustainable ways. It would damage the economies of rural areas and destroy jobs in an era when job destruction is already a real problem. It would cause our urban customers to lose access to locally grown, locally processed meats.

For all these reasons, I strongly 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.

Sincerely,
/sig/

Dawrenda Cooper
405-686-1633

Rhodes, Suzette

From: Heather Dowding [hmdowd6@yahoo.com]
Sent: Friday, May 21, 2010 9:45 AM
To: Draft Validation Guide Comments
Subject: 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.

As a consumer of livestock products who depends upon local, small independent meat processors, my concern regarding the process validation in inspected establishments HACCP programs has prompted me to submit these comments. I am not an industry big-wig; I am only one person who is concerned with the damage that I foresee these new validation requirements causing my local, independent meat processors.

When HACCP was first implemented, the meat industry saw a decrease in establishments. This initiative and new interpretation has the potential to decimate the remaining very small to small establishments, upon which so many Americans, including myself, depend on for locally and ethically raised meats. There is nothing wrong with the current HACCP system, whereas independent, small processors are concerned – nor is there any reason to believe the extraneous requirements would produce a safer end product. It has been estimated that the potential cost to validate a processors entire food safety system could easily run upward of \$500,000 initially and over \$100,000 for ongoing validation. No food safety problem has been identified to require this shift in agency interpretation of validation; I don't understand why this is necessary when there is a system in place that is working.

This proposal runs in direct opposition to other recent initiatives of the USDA. The Know Your Farmer Know Your Food Program aims to increase access to food produced on small farms, and to promote the development of local food networks; this proposed rule would decimate all production of meat produced locally in small farms. 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,

Heather Dowding

Energy Industry Analyst
Federal Energy Regulatory Commission
888 1st st NE Washington, DC
202-502-6763

Rhodes, Suzette

From: Marlo Capoccia [marloco@verizon.net]
Sent: Friday, April 16, 2010 11:10 PM
To: Draft Validation Guide Comments
Subject: Opposed to Reinterpretation of Regs

Hello,

I run a small local foods delivery service in Tompkins County, NY and have received notice from one of our farms that some USDA regulations are being reinterpreted in a way that would put our local USDA plants in danger of noncompliance. I do not have a high level of understanding of the implications of the regulations so at first glance the idea that more monitoring could be taking place sounds appealing. Meat recalls in the past five years or so have left me believing that more oversight or demanding stricter compliance of regulations is necessary. It was with great dismay, however, that I learned this week that the reinterpretation of regulations that I would expect would help protect my family and my customers is actually more likely to put several small slaughterhouses and farms out of business, raise prices for local meats, all with the possible end result of no greater protection for local foods customers.

You must know that nationwide small farms are having trouble accessing USDA plants and we in Central New York feel this acutely. The farms I work with often book appointments with meat processors one year in advance. Our few slaughterhouses are overworked- we need more plants, not fewer in our area.

For the amount of meat that comes through these plants- I'm thinking mostly of Leona as that's who most of our area farms use- I have never heard of a recall or illness as a result of their meats. This isn't, of course, a reason not to monitor them more closely. My concern is that if the financial input of a plant like Leona is as great as the \$500,000 initial input and \$180,000 yearly that the trade associations are estimating, then shouldn't we be getting a safer product? I don't have any sense that the regulations are going to improve a plant like Leona and that a very broad brush is being used to improve safety at plants with highly disparate systems and needs.

I am strongly in support of demanding a high level of safety from our meat processors for consumers like myself. I am not in support of draping a blanket of high-cost regulations over small processors who have been serving their local customers in relative safety. Please consider more specific ways to improve the safety of our meat supply than risking putting small processors and hence, small farms out of business.

Many thanks,
Marlo Capoccia
owner of Garden Gate Delivery and happy consumer of local meats

Rhodes, Suzette

From: Terence Cooper [tcooper@umn.edu]
Sent: Thursday, May 20, 2010 11:22 AM
To: Draft Validation Guide Comments
Subject: Not in favor

Dear Committee

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 potentially make meats from my organic pig producer (Pastures A Plenty and Red Tail Valley both of Minnesota) unavailable for me to buy.

As I understand it, Belgrade Meat Center, their processor, would be required to submit their products (Pasture of Plenty pork products) to as many as thirteen tests per product, costing perhaps \$10,000 per product to initiate and another \$3500 annually to maintain. Consider then the fact that Pastures of Plenty offers about 40 different processed beef and pork products in addition to all the fresh cuts and you can begin to see the size of the problem.

Implementation of these kinds of requirements will shut down the small farmer producing pork for the local foods market. I want to be heard on agricultural issues. I want to choose the food I eat, and that I want to buy locally, I support local rural economies, I want to eat meats from animals that have been humanely raised and slaughtered.

USDA has not made the case that that small processors are a danger, and that it is large processors that are involved in every food safety news story I see. Healthy, wholesome local meats are an important part of the fight against obesity in our nation.

T re involved in every food safety news story you see. Ask them why federal inspectors do not have the power to stop slaughter at major plants if they see something bad. Remind them that the state equal-to system, which is the licensing under which Belgrade Meat Center operates, has the built in safety that the meats are marketed in state only. And remind them that healthy, wholesome local meats are an important part of the fight against obesity in our nation.

Sincerely

Terence H. Cooper
2781 Noel Drive
Little Canada, MInnesota 55117

Terence H. Cooper
Univ. of Minnesota - Soil, Water, Climate
Distinguished Teaching Professor
439 Borlaug Hall, St. Paul MN 55108
phone - 612 625 7747 cell 651 230 2117
e-mail - tcooper@umn.edu