

HARTRICH MEATS, INC.
326 W. Embarras St.
P. O. Box 27
Ste. Marie, IL 62459
618-455-3172

Mark Hartrich

Tony Hartrich

May 5, 2010

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

RE: Comments – Draft Guidance on HACCP System Validation

Dear Mr. Almanza:

Hartrich Meats, Inc. respectfully submits these comments regarding the Draft Guidance on HACCP System Validation that were publicly released on March 19, 2010.

Hartrich Meats is a small third generation meat processor located in a very rural area of Southeastern Illinois. Our customer base covers a 60 mile radius encompassing at least six counties.

Food safety has always been at the forefront for Hartrich Meats. We are members of the Illinois Association of Meat Processors (IAMP), and the American Association of Meat Processors (AAMP). These two organizations are leaders in food safety for small plants. As a state association IAMP meets regularly with State of Illinois Inspection, and offers seminars at our state convention so that small plant operators can stay on top of regulations. IAMP and AAMP have a very good working relationship with the Illinois Department of Meat Inspection.

Every small plant – whether it is Federal or State inspected – has one major concern and that is food safety. For more than ten years, small plants have been operating under HACCP. During this time there have been very, very few recalls in small plants. All small plants strive to produce the best product they possibly can. Small plants have to rely on their customers returning time after time.

Today, we follow all the rules and regulations of USDA. We are able to produce wholesome products for our neighbors, friends, and local organizations that benefit our area and communities.

If the validation rules are enacted as proposed, there will be a large number of small plants that will close. Other plants will have to go custom exempt and do away with inspection entirely. Still others will have to cut back on the number of different types of products they will make.

There is no scientific evidence that proves all of this excess testing will make products any safer for the consumer!!!!

For over ten years, we have operated under HACCP with few problems. If this HACCP validation is adopted many changes will occur:

1. Loss of Jobs – from plant closings.
2. Loss of revenue for state and federal government.
3. Excess costs of testing will have to be passed along to consumer, raising cost of food.
4. Loss of sales tax revenues for small towns that are already struggling.
5. Loss of participation by small plants in FFA, school, and church projects.
6. With no plants available, more processing will be done in garages, barns, etc., with no regulations or controls. How is this safer?
7. Loss of a large variety of products.
8. All of the programs – Buy Local, Know Your Farmer, Farm and Table, Local Food Banks, Farmer and Hunters Feeding the Hungry – will no longer be available to the consumer because small plants will be out of business or not under inspection.
9. A lot of ethnic products will disappear from the market place.
10. Unemployment will rise due to plant closings or cutbacks.
11. Suppliers to meat industry will suffer large declines in sales if plants are forced to close.

Above are just some of the problems that will arise if HACCP Validation is adopted.

In conclusion: HACCP is working now. All of the testing does not guarantee that products will be safer. If small plants are forced to close because of the economic impact this proposal will bring, the American consumer will be the real loser. This proposal will make the big packers even larger. Right now five or six major packers control 80% to 85% of the meat supply in the USA. This will only get more concentrated under this new proposal. With this new proposal we are going backwards instead of forwards with food safety.

Respectfully Yours,



Mark A. Hartrich
Hartrich Meats, Inc.

Advantage

Food Equipment & Supplies

RECEIVED
MAY 04 2010

April 28, 2010

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

RE: Comments – Draft Guidance on HACCP System Validation

Dear Mr. Almanza:

Advantage Food Equipment and Supplies, respectfully wishes to comment on the Draft Guidance on HACCP System Validation that were publically released on March 19, 2010.

As a supplier/provider of food packaging and processing equipment and supplies, to the meat industry, our concern regarding process validation in inspected establishments HACCP programs have prompted us to write to you with our concerns.

Through communication with our trade organizations and meat processing customers it has become apparent that initiating systems validation in these establishments would considerably affect our company as well. It is our belief that this will cause many of the federal and state inspected processing plants we service to be forced out of business or their operations significantly reduced. The loss of income resulting from this will be devastating to Advantage Food Equipment because 90% of our business originates from small establishments.

We serve approximately 450 small plants. The loss of these small business and the diminished sales to those who remain, would reduce our business by at least 50% and we would eventually be out of business. We would like you to seriously reconsider your approach to these guidelines and how they will affect our businesses.

Advantage Food Equipment and Supplies appreciates the chance to comment on the Draft Guidance on HACCP System Validation. Thank you for your time and consideration.

Sincerely,



G. Jay Robinson
President/Owner

GJR/hc

cc: State Legislator – Tanya Cook
Small Business Administration – Omaha, Nebraska
Nebraska Farm Bureau – Lincoln, Nebraska
Nebraska Beef Council – Kearney, Nebraska
Nebraska Pork Producers Association – Lincoln, Nebraska

Rhodes, Suzette

From: Sue Stoddard [stoddardfam11@yahoo.com]
Sent: Wednesday, April 14, 2010 7:34 PM
To: Draft Validation Guide Comments
Subject: meat

I To whom it may concern,

It has been brought to my attention that there are some rules which are in the process of taking an effect on the small slaughter houses for people like us who raise our beef and need someone to butcher what we have raised. Our slaughter houses that service the small guys are needed. Please do all you can to keep us all going. Thank you.

Sincerely
Sue Stoddard

Rhodes, Suzette

From: Michele Braco [mbraco@stny.rr.com]
Sent: Thursday, April 15, 2010 7:42 PM
To: Draft Validation Guide Comments
Subject: sma,, scale farmers

I buy all my meat from small-scale farmers who raise it organically and sustainably. This bill could make it impossible for them to stay in business, Please do not take away this source of real food. Sincerely Michele

Rhodes, Suzette

From: Dave Dugas [ddugas@panhandlefoodsales.com]
Sent: Friday, April 16, 2010 7:10 AM
To: draftvalidationguidecomments@fsis.usda.gov.
Subject: Haccp validation

To whom it ma concern:

After reviewing the HACCP Systems Validation Documents, I feel that this is completely unreasonable at this time. The economy is not strong enough to support something like this. This is especially true for our company. We been in business for 45 years and have came upon hard times within the last 5 years. If this is implemented then our company will have no choice but to eliminate inspection and/or proceed a different direction or just simply close our doors.

Dave Dugas
Panhandle Food Sales inc
724-947-2216 ext. 215

Rhodes, Suzette

From: denmatonak@zoominternet.net
Sent: Friday, April 16, 2010 2:48 PM
To: Draft Validation Guide Comments
Subject: Validation of HACCP system

Docket Clerk, USDA,

In response to the validation of HACCP systems. First and most important, our establishment has years of written documentation and negative testing results which provide proof that the products are handled safely.

Current practices and procedures are implemented correctly and show success.

Being a very small establishment, we could not incur the cost of the new laws. These laws would create an "Economic Hardship" for this establishment.

With controlled measures in place our overall objective is being met. We are producing safe products and meeting critical operational parameters.

Miller's Quality Meat, Inc.

Dennis Matonak Vice President

142 North Main St.

Butler, Pa. 16001

Government Establishment # 9903

Rhodes, Suzette

From: Naftali Hanau [nafplants@gmail.com]
Sent: Wednesday, April 14, 2010 6:32 PM
To: Draft Validation Guide Comments
Subject: Testing Regulations

USDA,

I am writing to comment on the proposed regulations that would require in-line testing at all slaughter facilities. These regulations are absolutely inappropriate for small producers and will put many of the remaining small plants out of business. Placing these costs onto small slaughterhouses will force them to raise processing costs drastically, negatively impacting small farmers and the millions of consumers who are looking for locally raised meat that is produced in small plants. This rule will destroy the future of our meat system.

Thanks

Naftali Hanau

Rhodes, Suzette

From: Meat Locker [gilbertmeatlocker@embarqmail.com]
Sent: Wednesday, April 14, 2010 4:34 PM
To: Draft Validation Guide Comments
Subject: HACCP
Attachments: Validationformletter-AAMP-Generic.doc

This is a great concern to small businesses such as ourselves. This will be a costly venture for small business owners. Thank you for your attention to this matter.
Tom and Carey Gilbert
Gilbert Meat Locker, LLC

Rhodes, Suzette

From: Engelbert, John A [JAE3@alfred.edu]
Sent: Wednesday, April 14, 2010 2:57 PM
To: Draft Validation Guide Comments
Subject: HACCP Regulations

Hello,

I would like to state that I am completely against the new rules for slaughterhouses. This would make the already hurting meat market have its legs cut out from under it. Consumers don't want to pay the prices for meat as is, let alone adding another \$.50 to \$1 per pound on meat in stores. Not only will this hurt the consumers diets, but it will cost the farmers who rely on these slaughter houses a lot of money that they don't have. This would be extremely detrimental to the meat industry.

Please do not pass regulation

Rhodes, Suzette

From: Amelia Costigan [acdesign@verizon.net]
Sent: Wednesday, April 14, 2010 10:08 AM
To: Draft Validation Guide Comments
Subject: HACCP System Validation

I am all for more regulation and safety inspections of our meat industry BUT BUT please don't implement anything that will make it more difficult for small farmers raising sustainable, grass fed beef to stay in business. This is an important issue not only for the health of my family, the health of the planet but also a growing cottage industry. Please review the guidelines and make sure that what is implemented will not harm the small family farms who are pioneers in bringing healthier food to our tables.

Regards,

Amelia Costigan

Amelia Costigan
718 435-1232
acdesign@verizon.net

Rhodes, Suzette

From: peggyoco@gmail.com
Sent: Thursday, May 27, 2010 8:37 AM
To: Draft Validation Guide Comments
Subject: Message from Internet User - Proposed changes to HACCP

The proposed changes to HACCP pose an undue burden on small-scale slaughterhouses. These facilities are the life blood for small, family farms and proposing a one-size fits all approach will only result in the closures of these facilities and more food contamination issues as farmers are forced to sell to the large meat processing plants. Please reconsider. The small slaughter houses are not the problem with the contamination of the food supply system - and often are leading the way in food safety. A scalable approach is needed. Please find a way to separate within the regulatory structure the large agri-business mega plants from the small community-based localized plants.

thank you,

Peggy OConnor
2107 5th Street S
Arlington, VA 22204

Rhodes, Suzette

From: seana.yates@me.com
Sent: Wednesday, May 26, 2010 3:27 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - Keep Small Slaughter Houses Open

Dont make regulations too difficult for small, community based slaughterhouses to comply. Factory style slaughterhouses that are inhumane and too big to be effective in my opinion are disgusting and the american public should have an alternative without that alternative having to break the law.

Rhodes, Suzette

From: tampa-terry@tampabay.rr.com
Sent: Monday, May 31, 2010 12:59 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - Changes in Regulations Regarding Small-Scale Meat Processors

Dear Madam or Sir:

I would like to go on record as supporting small-scale meat processors. Please make sure the new regulations do not put local butchers out of business. I want to continue to have access to locally-raised, pasture-fed, and humanely-slaughtered meat.

Regards,
Terry Lee Gonzalez
3806 N. Lake Drive, #23
Tampa, FL 33614
Phone: 813.930.7300

Rhodes, Suzette

From: valdezdianne@hotmail.com
Sent: Thursday, May 27, 2010 2:30 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - Hazard Analysis and Critical Control Point HACCP food safety plan

I write to comment upon the proposed changes in the HACCP and their impacts upon community-based localized meat processing plants. The changes will threaten the ability of consumers to utilize these smaller facilities to obtain meats that we find to be more nutritious and flavorful, and that give us the ability to determine the source of what we choose to eat. While the rules would be appropriate when applied to the massive scale operations that dominate the US food system they are inappropriate in the case of community-based localized plants. Please consider the exemption or breakout of these smaller plants in favor of the older, proven effective on that scale of plant guidelines. As an auditor I realize that regulations do need to be created and that it might be an inconvenience to modify a proposed change but in the interests of the empowerment of the educated consumer I implore you to reconsider the blanket application of the proposed changes.

Regards,

Dianne M. Valdez, CIA, CISA, CCSA.