

Rhodes, Suzette

From: Amy Dawson [amy@emotcakes.com]
Sent: Saturday, April 17, 2010 4:08 PM
To: Draft Validation Guide Comments
Subject: Meat Laws

To whom it may concern:

I am writing because I am very concerned to hear about the proposed regulation changes that requires any meat sold by a farm to a third party to be USDA inspected. With the number of USDA plants in our area being so limited, this requires our local farms to book appointments very far in advance to ensure that their animals make it to slaughter when they are ready.

I realize that there are good intentions behind this, to better protect consumers from tainted meat. However, the proposed changes fail to take the financial effect of these smaller farms into consideration. These are people working small farms, with very limited resources, barely breaking even already. They are farming because they love it and are passionate about delivering a good quality product to local consumers. For the consumer, it is already much more expensive to purchase local, free range organic meat. Many families have made the choice to spend the extra money for their own health, the health of the animals, to encourage small farming operations and to support the local economy. However, if prices for this already more expensive meat increase by 50 cents to \$1.00 per pound, it will likely scare away new families from eating local meat, and put a strain on families that are already stretching their budgets to support local.

I encourage you to consider the small farm in how you implement these changes. I would like to continue purchasing local meat - it isn't enough to just buy organic/grass fed etc - It is so sad that it is cheaper to buy grass fed beef from Argentina in my local grocery store than from down the road already. I pay more to support the folks down the road - please don't put these hard working farmers out of business or overly tax the consumers - consider a way to make our food supply safer while promoting small business and the local farming industry.

Thank you for your time,
Amy Dawson
Trumansburg, NY

Address

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

Email: DraftValidationGuideComments@fsis.usda.gov

Re: Comments - Draft Guidance on HACCP System Validation

Dear Mr. Almanza:

Sugar Hill Farm respectfully submits these comments regarding the Draft Guidance on HACCP System Validation that were publically released on March 19, 2010.

Sugar Hill Farm is a small family farm producing 100% grassfed organic beef. As a livestock producer/farmer who depends on the meat industry, our concern regarding process validation in inspected establishments HACCP programs have prompted Sugar Hill Farm 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 Sugar Hill Farm because our business depends on very small and small establishments. In fact, to retain our USDA organic certification, we must have our beeves slaughtered and butchered by a USDA certified organic butcher. The only certified organic butcher we have found is a very small family owned meat processor. Small operations like this are still vital to farming and offer a small farmer a service that the very large processors would be unwilling to provide. Our country needs the small farmers, small businesses, and the alternatives offered. Problems with meat contamination have been traced to the very large processors where their very size and number of animals they process results in occasional problems. Please make sure you consider the impact on the small farmer and the small meat processor as you consider these new regulations.

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

Sincerely,

Cathy Pomanti
Proprietor, Sugar Hill Farm
cpomanti@comcast.net

Rhodes, Suzette

From: MICHAEL W GORDIENKO [gordienko2@q.com]
Sent: Monday, April 19, 2010 6:35 PM
To: Draft Validation Guide Comments
Subject: Validation

To whom it may concern:

I am a part-owner of a small, but well known manufacturer of sausage in the Twin Cities. We have been in business since 1954, and are currently going on our third generation. We have been blessed to continue operating our family business in which we truly love. It is a very competitive market, and not many "small guys" are left. We have been able to expand into other areas like a retail store, restaurant, and bakery business over the years. We continue to look for opportunities to grow our business, yet remain true to our quality by remaining a small plant for quality control. We recently entered into the "equal to" program for wholesale distribution. Our hopes for getting our products out to other local restaurants and retailers seems like a logical way to keep our business thriving.

We knew going into the equal to program, that it would entail a lot of work and dedication on us. We are up to the challenge and have learned a lot in the process. We have enjoyed some success and broader name recognition since joining the program. We also feel our new customers are benefitting from our products, and expanding their own businesses by partnering with us. That being said, I have some very strong opinions on this proposed validation initiative.

As proposed, I believe this initiative will kill any chance for us to continue the equal to program. Honestly, it seems redundant especially for fully cooked HACCP plans, and too cumbersome for any small operator. How long can an operator sit on product as all these lab tests are being done? The costs alone will be a deterrent for us to continue. I believe this initiative was created by someone with no experience in our industry. It is one thing to strive for food safety (we all want this) and another to implement new guidelines, that have no proof of making food safer. The only sure thing this validation initiative will achieve is to eliminate small operators from the program, resulting in loss of jobs (we have hired 3 new workers, and probably will hire more) as newly acquired markets will again be closed to us. Consumers will be stuck with generic "big boy" products which you feel will be safer.

I want safe food, I MUST make safe products or my business will die. No responsible operator sends out unsafe products. Their business won't last. We love our business too much for that to happen. We have worked very hard to follow present guidelines, and create a thorough HACCP plan for our products. We have worked too hard to have this mean nothing now. What a shame and waste of hard work for many operators doing the right things to have it all taken away because of this initiative. I truly hope the USDA reconsiders this initiative. I hope you can see the long term effects something like this would do the many businesses it would affect.

I apologize for the length of this letter, but felt compelled to have my opinions heard. I hope this does not fall on deaf ears, and is truly taken into consideration as your process continues in search of a proper balance of food safety and commerce.

Thank you for your time.

Michael Gordienko

Rhodes, Suzette

From: Rachel Firak [rfirak@gmail.com]
Sent: Saturday, April 17, 2010 4:42 PM
To: Draft Validation Guide Comments
Subject: Comments on HACCP validation requirements

Hello,

I appreciate that in your letters you have acknowledged that compliance to these new requirements may be financially and logistically difficult for small and very small production plants, and that you have compiled a guidance document to aid these plants in adhering to the requirements. My opinion is, it is not enough. Allowing no exemptions to these new requirements may seem fair and balanced, but as you undoubtedly realize, the burden falls heaviest on those very small plants that in fact have done the least amount of damage to our food system. Economically, this makes no sense. Why spend money you do not have regulating these least of all offenders? This is akin to going to war with a country whose only weapons are sticks and stones- it leaves us more vulnerable to the "weapons of mass destruction" inherent in the very large meat producers' way of business.

Put that money to better use- to heightened regulation for the very biggest producers that can cause the most damage to our food supply. Establish a cutoff point that defines small and very small businesses and exempts them from these regulations, with the understanding that money would be wasted on them; and besides, eliminating these small businesses would certainly not bring more security to our food system. If the small and very small producers were wiped out, we would all be buying meat from the large producers, the very same producers that have caused widespread e.coli and salmonella outbreaks in the past.

I understand that it may be in the USDA's best interest to let these small producers go bankrupt, given that regulating them is so difficult and not cost-effective. Why spend money to get to that state? Preclude them now, before it comes to that point. We need to focus on efficacy first, egalitarianism second. Regulate those who need regulation the most. Leave Farmer John alone. No one will gain anything from going after him- not him (he will go bankrupt), not his consumers (who will be forced to find their meat from bigger, less secure sources), and not the regulatory agencies (they will be spending money frivolously). Think of the economy. This is not the time- financially- to worry about Farmer John's 30-cow herd. It will only hurt our small towns, and the paltry number of lives saved from such regulation of very small producers will not compare to those that will still be lost due to inadequate regulation of Big Meat, Inc.

Thank you.
Rachel Firak

Rhodes, Suzette

From: Pam Gueldner [p.gueldner@gmail.com]
Sent: Sunday, April 18, 2010 9:05 AM
To: Draft Validation Guide Comments
Subject: Local Meats

I am writing to express my concern over the recent USDA reinterpretation of some regulations that have been in place for several years to mean that all butchers/slaughterhouses/meat processors with a USDA seal must significantly increase the amount of testing they do.

I own a cafe and we use local sources for most of our meat, vegetables and dairy. We support our neighbors so that they can continue to provide healthy, clean safe products. I feel that buying meat from a local farmer who I know and trust is better than buying meat from a large factory farm whose products are sent to a large USDA processing plant.

I do not think enforcing tighter regulations on small farmers is necessary and I am afraid that it will make it impossible for the small business people in my area to continue to provide the high quality meats because there are not enough USDA plants in our area and the wait time to get into these plants is too long to be practical.

I believe regulations are good and necessary, however I feel that small processors are just as successful at following regulations and maybe are better than large plants.

I have no confidence that meat that came from a large USDA certified plant is safe. I will not eat meat from a CAFO, factory farm or other large producer and feel that the volume of the operations make the meat unsafe, and not my small meat processor.

Sincerely,
Pam Gueldner
28 Brooktondale Rd.
Ithaca, NY 14850
607-272-4870

--
Pam Gueldner
Mandible Cafe
254-6206

Rhodes, Suzette

From: Nancy Norton [nnorton@mac.com]
Sent: Sunday, April 18, 2010 2:56 PM
To: Draft Validation Guide Comments
Subject: Don't Over-Regulate Small Butchers!

Hi,

I have been eating local meats from small farms for many years. My parents and grandparents and all of our ancestors did as well. I am not aware of any of us becoming seriously ill from these foods.

When animals are processed by people who care about avoiding unnecessary suffering, either of the workers or of the animals, they take the care necessary to make sure that the food is safe and clean. I know the farmers who raised the meat, often knowing the animal as well. I know the butcher who is slaughtering the animal and preparing it for my use. No one in the chain from farmer to butcher to family cook wants anyone to be sick. We can all trace back any illness to the source, protecting us from the kind of widespread contamination that has occurred with industrial scale feed lots and slaughter houses, and anonymous food distribution networks.

By reinterpreting the regulation for slaughterhouses to include increased testing, you may be putting them out of business, resulting in the loss of small scale livestock farms and ultimately, the inability of my family to purchase healthy locally raised, humanely raised, pasture raised meats. I am an advocate of local meats for many reasons.

The first is my families health - the food is cleaner, easier to trace, and higher in nutrition because of the way it was raised.

I appreciate the value of farms to our community. They provide employment, improve the environment and maintain open green space, and keep our money in the community. Locally raised meats do not contribute to global warming in the way concentrated animal feeding operations [CAFOs] do, but instead improve the grasslands through well-managed rotational grazing.

Finally, I can not tolerate the suffering of another animal for my culinary pleasure. The way industrial scale CAFOs raise animals does not allow the animals to engage in natural behaviors, but keeps them confined, often without removing excrement, often unable to even turn around, eating 'foods' that are not their natural foods, which may result in increased stress which requires antibiotics. None of this is necessary; all of it proves a stress to the environment (e.g. the pollution of the Gulf of Mexico and the Mississippi River from agricultural run-off, methane production from animals fed less digestible corn based diet, the massive use of petroleum based energy in growing all that corn, etc.).

Please reconsider these regulations and do everything possible to encourage the growth of local small businesses such as family farms and butchers. I would be happy to discuss this with you, or answer any further questions at your convenience.

Sincerely,

Nancy Norton
26 Quarry Road
Ithaca, NY 14850

Riley, Mary

From: Colton Osborn [csosborn@live.com]
Sent: Tuesday, April 27, 2010 8:40 PM
To: Draft Validation Guide Comments
Subject: HACCP Proposal

I plead that the USDA reconsider the impact that the HACCP system would have on the growing movement of small butchers, meat farmers, farmer's markets and the like. There are many people and families that look to this small market to buy specialty meat products valued for their health benefits due to the natural grass-fed and finished diet, great taste, and the business within the local economy.

These farmers may be small, but they are part of the business landscape within this country and they deserve to continue their businesses that have provided wonderful, high quality products directly to the consumer. If there happens to be a problem with the product, it would be directly traceable to the business that provided it, making tracking the problem very easy, unlike the current problems with tracking in big companies, etc. Furthermore, these small farmers deserve to be informed on the details of this proposal so that they may participate in commenting on how it would badly hurt the entire community in which they are a part of.

I would appreciate to see the USDA recognize the fact that small local food businesses are completely different in their risks and challenges compared to large agribusiness, which is the source of most all the outbreaks that the HACCP system is proposed to respond to. This recognition would allow for specific regulations that would be appropriate for small businesses, and allow exemptions that take into account the unique consumer-producer relationship within direct purchasing.

Even taking into account the risks involved in small businesses, they are directly traceable and the producers are held more accountable to us, the consumers.

Thank you for your time,

Mr. Colton Osborn

Rhodes, Suzette

From: Gridmeats [gridmeats@gridcom.net]
Sent: Tuesday, April 20, 2010 12:18 PM
To: Draft Validation Guide Comments
Subject: Comments - Draft Guidance on HACCP System Validation

Docket Clerk, FSIS

Rom 2-2127

5601 Sunnyside Avenue

Beltsville, MD 20705

Re: Draft Guidance on HACC 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 HAACP 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 HAACP 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,

Steve Ringer

Gridley Meats, Inc. Plant #130
P.O. Box 348
Gridley, IL 61744
309-747-2120

Rhodes, Suzette

From: Franz Sugarman [franz.sug@frontiernet.net]
Sent: Saturday, April 17, 2010 2:47 PM
To: Draft Validation Guide Comments
Subject: Possible reinterpretation of meat inspection regulations

To whom it may concern:

The current efforts to reinterpret USDA regulations regarding meat inspection and small processors has a great potential to affect my family's consumption habits and quality of life. We are patrons of local meat providers who by necessity use small processors. I understand that the proposed reinterpretation of current regulations is such that small processors will have to drastically increase the number of inspections they do. I am concerned that such an interpretation could put many of the small local meat providers we patronize and the small processors they utilize out of business.

This would be a shift in entirely the wrong direction. While on the face of it, increased meat inspection sounds like a good thing, the real tainted meat problems come not from small processors, but large processors and factory farms. Anything that forces local meat providers and small processors out of business in my opinion will have a detrimental impact on public health.

I ask that you do nothing to increase the burden on small, local livestock farmers and processors. Any increased inspection burden is likely to force them out of business. In the absence of such providers, we will not shift our patronage to factory farms and large processors. We would sooner become vegetarian. The modern American meat industry and factory farms are inherently immoral, unhealthy, and unsustainable, and we will never support it with our business. Please join the public in its growing support of local meat alternatives.

Thank you.

Sincerely,
Franz Sugarman
245 Eastman Hill Rd.
Willseyville, NY 13864

Riley, Mary

From: Rod.Ofte [Rod.Ofte@willowcreekfoods.com]
Sent: Friday, April 30, 2010 1:59 PM
To: Draft Validation Guide Comments
Subject: USDA drafting of new meat testing regulations for small foods processors

Dear Secretary Vilsack,

I am admitably a non-political person. However, the Food Safety and Inspection Service of the USDA is drafting new meat testing regulations that will harm the food producers and processors that they are designed to support.

I have been supporting what I believed to be your initiatives to support local and regional food solutions. America has become too dependent on massive food corporations that control a majority of food and meat processing in the US. A better solution for the environment and the economy is to have local food processing solutions that can support communities, consumers and farmers.

I don't think it is your intent to harm regional foods systems, but by supporting new meat testing regulations for small foods processors, you are indirectly killing the local/regional foods movement by pricing them out of the picture and limiting solutions that they can use.

We run a sustainable family farm in SW Wisconsin. We only use local processors, even though they are sometimes more expensive, to support our local community and because it minimizes trucking which is hard on both the animals and the environment.

Please consider the good of all Americans when you consider your vote on this crucial subject.

Feel free to contact me to discuss the subject in the case that I am misinformed or if you would like more informaton on my point of view.

Thanks for your time and service,

Rod

Rod Ofte
Willow Creek Ranch
608-451-2861

HAUN'S MEAT & SAUSAGE, LLC

May 1, 2010

To Whom It May Concern:

This letter is being written in response to the validation guidance proposed for HACCP systems. The big question would have to be why? If you were so worried that HACCP plans were being used as recipes, than why not use your on the ground inspectors to prove a particular plants plan is not working, not by implementing another set of rules and regulations. If 90% of the meat processors are small or very small and they produce 10% of the market share in the USA - how could these small businesses be posing such a huge risk. You are going to kill off the very system that allows the small processors to serve their local and regional markets. This also ties in with all the farmers markets, niche marketing associations and individuals and the farm to plate program and the local taxpayer who raises animals to feed his family and local neighbors. Citizens like to eat locally grown products. These citizens provide local jobs, pay local, state and federal taxes. We don't need to loose more agricultural jobs.

If a small or very small processor puts out an (unsafe) product his name or family name is on every package. If I have to prove to a scientist that the product I process is safe that goes against the rules and regulations that USDA and my state have already in place and are currently being used by all processors across America.

IF F.S.I.S. goes down this path it will eliminate a large number of small and very small plants that serve the communities across America giving the large processors such as Swift, Tyson , etc. even more market share and power to sway the rules their way and any direction.

This is the same story as the financial institutions new rules and regulations that are set up for huge banks and the will crippling to local and regional banks. The federal government is hell bent to prove they are going to protect the public – protect from whom and what?

Sincerely,

Jerry Haun
Past President Northwest Meat Processors Association
Current Region 8 A.A.M.P. director

Rhodes, Suzette

From: ccrosby9@aol.com
Sent: Tuesday, April 06, 2010 11:39 AM
To: Draft Validation Guide Comments

Dear Mr. Almanza:

I am the owner of a small family owned meat market and deli called Mackenthun's Meats & Deli, Inc. in St. Bonifacius, MN. My market was originally started by my father in 1955. We have been producing quality smoked meats and sausages for over 50 years! Mackenthun's built a new plant in 1988 and our business has steadily grown and grown over the years. We now employ 20-24 employees including many high school and college students as well as 6 full time staff and local part time community members. Our business is known all over the country with customers coming from almost every state.

Food safety, of course, has always been top priority in our store. It has always been important for us to teach our students food safety for their own knowledge and to inform our customers. We pride ourselves in a clean and food safe store. For just over a year now, we have been implementing our HACCP plan so that we may sell our products to local events and wholesale to local establishments. We worked incredibly hard to organize these plans and have been successful in providing our quality products to new outlets. In this economy, it was important for us to find another avenue to sell our products. As you know, keeping staff employed through these times is critical to America's economy as a whole. Mackenthun's is proud to say that we have not laid off any employees during these trying years and credits that to our new wholesaling business.

I am concerned that the USDA's Food Safety and Inspection Service believes that the current HACCP system is in need of repair when there have been long-standing and well-respected controls currently in place. These controls are found in the following:

- * FSIS regulations
- * FSIS Federal Register documents (e.g., FSIS Appendix A, FSIS Appendix B, etc.)
- * Peer-reviewed scientific supporting documents

We currently produce products under 3 HACCP plans and are inspected by the Minnesota Dept. of Agriculture. Our plans have been working perfectly with absolutely no issues. I have found the Minn. State Inspection Service professional, accommodating and incredibly knowledgeable. They are an outstanding group of people providing services to keep our food safe in Minnesota.

The new microbiological testing being discussed would definitely have a detrimental effect to Mackenthun's as well as the Minn. State Inspection Service and hundreds of local producers. Many, many local markets and processing plants would be unable to pay the extremely high estimated costs associated with this new form of validation. Speaking for this plant, we would have to lay off personnel immediately as we would not be able to afford the new testing. Our wholesaling program would be eliminated. No establishment should be forced to spend thousands of dollars on new testing to validate scientific data that has been tested and accepted for many years. This, I believe, would be a huge step backward in these days of moving our country forward and pursuing the new thoughts of sustainability and true food safety.

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.

Mackenthun's Meats thanks you for your time and consideration on this crucial issue.

Sincerely,
Cathy Mackenthun/President Mackenthun's Meats & Deli, Inc.

cc: Minnesota State Senators
Minnesota Small Business Administration

Rhodes, Suzette

From: Jenny Sabo [saboranch@gmail.com]
Sent: Tuesday, May 18, 2010 5:36 AM
To: Draft Validation Guide Comments
Subject: local meat HACCP plan regs

We are writing to comment on current and upcoming HACCP analysis regulations.

We bring in for butchering, and sell directly, about 20 beef animals each year. Our local butcher is 35 miles away, serves many small ranches for beef, pork, lamb, goats and even farm raised elk. This is the only butchering facility within 75 miles of our ranch, and therefore extremely important to our financial viability as producers of locally raised, locally sold grassfed beef.

We have received permission from our state inspector to personally attend all slaughters, and all meat cuttings of our beef, which we do for every animal we take to our butcher. We are extremely satisfied with the cleanliness, quality, and professionalism of our local butcher, Montana's Best Meats, in Whitehall, MT. "Best Meats" slaughters a relatively small number of animals on any given day, and most of those animals are returned directly to the ranchers or farmers who raised them. This is a small, locally crucial, and easily inspected system. One inspector is on hand every slaughter day, and we can personally attest to their knowledge and professional approach to the job.

We already are working with high butcher costs (\$450-650.- per beef, depending on packaging), in working to sell our meats locally and direct to consumers. While we completely support our current local beef processing infrastructure, we will have an extremely hard time making our own operation sustainable financially if our butcher needs to add more costs into our operation, due to increased desk work surrounding HACCP reporting.

Please make sure that small, locally important meat processors are given a different set of regulations than those processors who slaughter hundreds or thousands of animals each day, at high speeds. Our local butcher facilities are crucially important to the burgeoning local food movement developing in our schools, restaurants, grocery stores, and farmers markets. Without these butchers, providing locally raised meats to local consumers is impossible!

Mark and Jenny Sabo
Sabo Ranch
P.O.Box 65 -- 303 Pony Rd.
Harrison, MT 59735
(406)685-3248
saboranch@gmail.com- email
www.saboranch.com- website

Rhodes, Suzette

From: lherring81@gmail.com
Sent: Monday, April 05, 2010 9:43 AM
To: Draft Validation Guide Comments
Subject: Message from Internet User - Draft Validation Comments

Dear Mr. Almanza:

T.L. Herring and Company 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 supply many groceries, restaurants, and other small meat processors with products that will be affected by this validation process. We daily ship products to these customers to produce high quality meat products. These products are then consumed by their own families, communities and satisfied consumers across the country.

We 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. Most if not all meat processors will 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 thus less product availability for the customer.

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.

T.L. Herring and Company appreciates the chance to comment on the Draft Guidance on HACCP System Validation.

Thank you for your time and consideration,

Sincerely,

Lindsay Herring

T.L. Herring and Company Est. # 11504
2101 Stantonsburg Road
Wilson, NC 27893

Rhodes, Suzette

From: Michael Robertson [reddawnarms@gmail.com]
Sent: Monday, April 05, 2010 11:48 AM
To: Draft Validation Guide Comments
Subject: For your consideration.....

Al Almanza,

I am the third generation operator of Robertson's Hams in Marietta, Oklahoma. We have been in this small town for 67 years. We employ 30 full time employees between our plant and our retail store. The average time our employees have worked for us is over 10 years. We produce beef jerky, snack stick sausages, cooked sausage, boneless hams, boneless turkeys, whole turkeys, whole hams, pork loins, roast beef, fresh pork sausage, pork skins, ribs, and smoked cheese. We sell our products in our company store as well as 5 other privately owned franchise stores throughout Oklahoma and Texas as well as mail orders and other distributor's and retail truck stop chains. We strive to do things in an honest and proactive manor. We work with our inspector to correct any problem they find when they find it. We don't buck the system. We don't argue or appeal our inspectors decisions. We have been through 2 food safety assessments and each time we changed our process to what they recommended (even though the second FSA changed back some of the things the first FSA made us change). Despite all the crazy stuff that USDA has thrown at us in the last few years we change to get along. We do these changes despite never having had a recall because of the safety with our products. We just try to get along.

Having said all that I'd like to comment on HACCP validation. Please, be careful to consider small plants like ours. While I have no doubt that USDA doesn't give a shit about our company I ask that you please stop and consider that your actions will affect many people who depend on this company. Is safety important? Yes. Do you need to consider that small plants may not be able to afford to spend all the bucks needed to have validation done on every product that they make? Yes. In the past I have seen the way USDA implements new policy and the effect it has on small plants. Do I think your out to close small plants? No. Do I think that USDA takes the time and effort to actually consider the effects their actions will really have on small plants? No. By the time you realize how you've hurt small plants it will be too late to help them. So, Al Almanza, I ask that you please use some, not so common, common sense when approaching this issue of validation. If you would like to discuss this further I would welcome you to call me 580.504.4136 or for that matter come see me. I'd welcome you into my home. 2415 Portico Ave Ardmore, Oklahoma 73401. You sir are a powerful man. I ask that you consider us little people.

Michael Robertson
Robertson's Hams