

Rhodes, Suzette

From: BRUCE HERR [bruceherr4@dishmail.net]
Sent: Thursday, April 08, 2010 2:14 PM
To: Draft Validation Guide Comments
Subject: HACCP Validation Comment

To Whom It May Concern,

I would like to comment on the Haccp Validation guidance that was recently released. I am the co-owner and operator of a State Inspected meat plant in Indiana. Our operation is a small slaughter, processing and retail facility that has 10 employees. Our facility has a Haccp plan that works well and we work hard at producing high quality products.

If the FSIS is going to force this Validation documentation on us, it will cost more than we will be able to bear. If you are going to put such a financial burden on our small meat plant, you might as well lock our doors now, there is no way for us to be able to afford the huge cost of microbial sampling at our establishment. If the public demands this microbial sampling, then the public needs to pay for it through taxes, our meat plant cannot afford any more costs from FSIS regulations.

Bill Burkhart
Lengerich Meats, Zanesville IN

Rhodes, Suzette

From: Wes Plummer [plumbob_4@yahoo.com]
Sent: Thursday, April 08, 2010 1:28 PM
To: Draft Validation Guide Comments
Subject: Please don't force more on small businesses.

My name is Wes Plummer, Owner / Manager of Lower Valley Processing Co. LLC in Kalispell, Montana .
Phone number is 406-0752-2846.

About the HACCP Validaton , We are a Montana State Approved Plant our State number is 007 and we are very proud and hold are standards high. We have an average of 25 employee's who work hard for us and are also proud of Lower Valley Processing Co. LLC.

As a small plant we do everything to keep are crew going. We have 134 approved multi ingredient products all with a HACCP PLANS , along with HACCP PLANS for hundreds of Raw, Not Ground Meat and Poultry Products, also Raw,Ground Meat and Poultry Products. The HACCP PLANS for Slaughter include Beef, Buffalo, Elk, Swine, Sheep,and Goats along with Emu and Ostrich. In 2009 we slaughtered 2037 animals , an average of 40 per week. These are great numbers for our small establishment.

Montana is Great State, also a Big State and inorder to make a living Small Plants have to do a little of everything to make a living. The initial validation cost and ongoing validation cost will be the end of a lot of GREAT SMALL PLANTS which are the backbone of America. To me there should be testing or validation on every 1 out 500 per species slaughtered, and on other products or plans it should be on a tonage plan in order to make it cost effective for the small verses the big plants. Please make it a level playing field.

Wes Plummer

Rhodes, Suzette

From: Graham Unangst-Rufenacht [graham.rufenacht@gmail.com]
Sent: Wednesday, April 07, 2010 5:23 PM
To: Draft Validation Guide Comments
Subject: Comments on New USDA requ. for AAMP

To whom it may concern,

The new requirements being suggested for small scale meat processors are a dangerous step I encourage you not to take, and, in fact to consider making it easier for the skill sets required to process on farm to be dispersed throughout our populace so that we can relieve many unnecessary costs - financial, health related, and energy related. The suggested new rules don't really address any real problem since we have had a functioning HACCP Plan since 1999 which is working, so what are you validating?(we undergo extensive E.Coli testing every year already with Zero (0) positives ever), and - as I've stated above - the financial burden is so great that this will destroy an industry (community-based meat processing) that is enjoying a small renaissance and creating jobs.

Where we need more regulation and enforcement of safety protocol are with the large "farms" and processing facilities which are dislocated from any social or land ethic and involved in significant government collusion.

Please consider my comments as a farmer, teacher, permaculture designer, and citizen of this country and ecology - both social and environmental.

Sincerely,
Graham Unangst-Rufenacht

Rhodes, Suzette

From: David146@cox.net
Sent: Wednesday, April 07, 2010 10:30 PM
To: Draft Validation Guide Comments
Subject: Message from Internet User - HACCP Validation

Tulsa Beef and Provision Company
Aka: Tulsa Beef Company
1537 East 7th Street
Tulsa, Oklahoma 74120
918-587-5197

Tulsa Beef Company is a state federal inspected wholesale meat packing facility that has been in business since 1935 and has been operating under HACCP for 12 years. Tulsa Beef Company has a good respectful relationship with all its inspectors. Tulsa Beef Company has been treated very well by all of them and they have been very helpful to us with HACCP program.

Tulsa Beef Company receives updated HACCP letters from all its meat suppliers yearly and Tulsa Beef Company updates its HACCP plan yearly.
Tulsa Beef Company has always put food safety first and through the last 50 years we have done a good job producing good safe product. Tulsa Beef Company has done everything USDA and FSIS has asked us to do and now you tell us that is not enough. Here at Tulsa Beef Company it is the the consensus that more testing of our product incoming and outgoing product is not the answer. All of the tests we have sent to the lab for E.coli 0157:H7 have come back Negative. Our HACCP is working as intended, so there is no problem.

Sincerely
David Heath
VP Tulsa Beef and Provision Company

Larry Compston
President
Tulsa Beef and Provision Company

Rhodes, Suzette

From: Matt Reid [matt.reid@att.net]
Sent: Monday, May 24, 2010 2:31 PM
To: Draft Validation Guide Comments
Subject: HACCP system for small butchers

With many friends who raise their own animals in rural parts of California, I strongly urge the USDA to consider the impact the proposed HACCP system would have on the growing movement of small butchers, meat farmers, and farmer's markets. Many people, including my friends, now look to this small, but burgeoning, market to purchase specialty meat products valued for their contribution to the local economy, taste, and health properties connected to grass finishing.

Despite their small size, small butchers are an important part of the business landscape and deserve to be informed on the details of this proposal so they may participate in commenting. Furthermore, there is strong evidence that regulations such as this disproportionately impact such businesses. This impact deserves to be further studied as we weigh the costs and benefits of further HACCP implementation. A full economic impact analysis must be conducted.

I would also like to see recognition of the obvious fact that small local food businesses are fundamentally different in their risks and challenges compared to large agribusiness, the source of most large outbreaks this proposal was created to respond to. Such a recognition would allow for specific regulations that are appropriate for small business, further study on less capital intensive HACCP programs, and exemptions that take into account the unique consumer-producer relationship inherent in direct purchasing. Small local food businesses, regardless of their risks, are more traceable and therefore more accountable to the consumer. There is no year-long manhunt for the cause of outbreaks when it comes to direct purchasing.

Sincerely,
Matthew Reid
1311 Pine Street
Calistoga, CA 94515

Rhodes, Suzette

From: mkacher@charter.net
Sent: Thursday, May 20, 2010 11:03 AM
To: Draft Validation Guide Comments
Subject: New Rules

I understand the Food Safety and Inspection Services (FSIS) division of the United State Department of Agriculture (USDA) is proposing new rules which will impact small meat processors greatly and potentially make meats from them unavailable for me to buy due to dramatically increased costs. I can't believe this is being prompted by a safety issue as all of the recent headlines point to the large processors as the heart of any problems. I can only assume it is the interests of the large processors that are prompting these reforms.

I believe that healthy, wholesome local meats are an important part of the fight against obesity and in favor of healthy lifestyles in our nation. Any regulations that stifle this effort will only continue to put us on the losing side of this effort.

Thank you,

Michael Kacher

Rhodes, Suzette

From: Nathan and Shannon Carter [nathanshannon@mac.com]
Sent: Monday, May 17, 2010 1:40 PM
To: Draft Validation Guide Comments
Subject: HACCP Validation Requirements

I have just become aware of the new HACCP Validation requirements. These new testings will be the death of small processing plants across the country. Who will I take my lambs to when the USDA enforces cost prohibitive testing on small community plants? Without my local plant, I would not be able to provide my customers with a healthy, local product, that is USDA inspected. The same can be said for the hundreds of other farmers around me in central Virginia.

There must be a solution to this that doesn't require a large group of people to lose their jobs. I did not get into sheep farming so that I could load them on a truck and have them shipped off to some mega plant, never to be seen again. I enjoy delivering a finished product to my customers that is healthy, natural, and local. Were it not for my local plant, this would not be possible.

Thank You,
Nathan Carter
Manager, Graves Mill Farm.

Rhodes, Suzette

From: Patrice Johnson [johns388@umn.edu]
Sent: Thursday, May 20, 2010 11:51 AM
To: Draft Validation Guide Comments
Subject: New FSIS and USDA Rules

Hello. I am writing because I am concerned about the new proposals regarding how meat is processed and tested. These proposals will cost my small local farmers too much for them to continue meat production, and will result in lack of choice for me and members of my community. These proposals run contrary to the "Know Your Farmer, Know Your Food" campaign.

As a meat consumer I am appalled and frightened by the practices of large processing plants. I am sickened by the treatment of animals in large agribusiness farms. As an American, I have the right to choose where my meat comes from, and make choices about which farmers I support. I buy local, from farmers I trust. I purchase and consume humanely raised and slaughtered animals

The FSIS and USDA are attempting to hit small rural communities with laws that prohibit their existence, yet they allow major slaughter houses to continue unsafe and inhumane practices. In fact, modern food safety issues such as E. coli are coming from those large processors and originate with those unsafe and inhumane practices.

I will continue to discuss these issues with the people in my community and ask you to reconsider any laws that will limit our choices, and that will eliminate small meat operations.

Thank you for your time and consideration, Patrice Johnson

2865 Marion Street
Roseville MN 55113
Ph: 612-625-6757

Rhodes, Suzette

From: Shawna Steffen [slswillmar@gmail.com]
Sent: Thursday, May 20, 2010 9:40 AM
To: Draft Validation Guide Comments
Subject: FSIS new rules proposal

I'm concerned about new rules being proposed which may affect the ability of myself and others to buy meats locally from local producers.

As I understand it, these rules run counter to the USDA's much ballyhooed "Know Your Farmer, Know Your Food" campaign. **I** want to choose the food I will eat, I prefer to buy locally and support **LOCAL** rural economies. I would also like to choose to eat meat from animals that have been humanely raised and slaughtered, not animals from large processing plants that seem to have major problems that make the news. Actually, it is large processors that are involved in every food safety news story I seem to see. I never see anything about the smaller processors, which have built-in safety measures and market their meat only in the state they reside in. Why don't federal inspectors have the power to stop slaughter at major plants if they see something bad?

Finally, please keep in mind that healthy, wholesome local meats are an important part of the fight against obesity in our nation.

Thank you,
Shawna Steffen
Willmar, MN

Rhodes, Suzette

From: Tammera Callahan [tammeracallahan@yahoo.com]
Sent: Friday, May 14, 2010 3:07 PM
To: Draft Validation Guide Comments
Subject: Draft Guidance on HACCP System Validation

To whom it may concern: I am a San Diego resident and recently learned of the USDA's intent to apply more strict/costly regulations for smaller processing plants used by local farmers. The costs associated with these new regulations will have a negative impact on the small business owners in this industry and will result in even fewer farmers (instead of more) than we have today. During a time when so many jobs are outsourced to other countries, and big Agro is controlling what 80% of Americans are eating, we should be supporting the local and smaller farmers of this country...especially those who promote community based meat processing and humanely produced meats.

Programs like Know Your Farmer Know Your Food are exactly the direction this country needs to go in and cannot serve as more political rhetoric. I recognize these regulations are the result of a rise in contaminated meats but everyone knows those contaminated meats are not coming out of the smaller processing plants. These outbreaks are happening in places where they are handling thousands of animals a day. The regulations cannot be a "one size fits all" approach to the problem. The only way to adequately serve our farmers who use these smaller plants is to recognize and applaud the work they have done to keep their meats safe for consumption and keep them fiscally exempt from the costly regulations that should be applied to the larger plants.

Respectfully,
Tammera D. Callahan

San Diego, CA

White, Ralene

From: Dottie Bell [sbbell@localnet.com]
Sent: Wednesday, June 02, 2010 11:48 PM
To: Draft Validation Guide Comments
Subject: small local meat produces

I have been working on developing my small grass only highland beef herd for the past 5 years. I do this on top of working at another full-time job. I am an active and involved citizen in my community.

I believe in raising and harvesting livestock with respect and humanely. The big agribusiness cannot do that. They focus on feeding the masses of people that don't care where or how their food is raised and making tons of money. I need to focus on the people that do care. They want food that has not been "cheated" as one of my customers put it. They want healthy, honest food! I want to give them that but as I keep working at it things just keep getting harder. Please don't mess with a good local system that is really beginning to take off for the small producers. The small local slaughterhouses that I use take GREAT pride in their facility! They welcome me in the door I can see my animals all the way through and am assured they are handled humanely right to the end. For me and my customers THAT IS VERY VERY IMPORTANT! More rules and regulations can only encourage these wonderful local places to close the doors and therefore close down our small self-sustaining farms.

PLEASE PLEASE THINK ABOUT THE SMALL FARMERS FEEDING THEIR LOCAL COMMUNITIES. AFTER ALL WE ARE DOING WHAT MUCH OF THE PUBLIC IS LOOKING FOR! We are the going green of the farmers market.

Dottie Bell
Waterford, ME

White, Ralene

From: Barbara Skehan [barbara.skehan@gmail.com]
Sent: Wednesday, June 02, 2010 3:39 PM
To: Draft Validation Guide Comments
Subject: Inspection of Slaughter House Legislation

To Whom it may concern,

I understand the need to keep our food safe. I do not believe that by instituting regular, year-round testing of all meats, in all slaughter houses, whether or not problems have been identified, is the answer. There are many small scale slaughter houses that are meticulous in their operation safety procedures already, and do not require legislation to keep their customers safe. Do not penalize them with more testing, paperwork, and increased costs. They will be forced to close, or to pass on these additional costs to their customers (us, etc.).

Again, we do not need to throw a blanket fix over every slaughter house to control this problem, but instead need to closer monitor and test the plants that consistently have these safety issues. It has never been a small scale slaughter house, but always large corporate plants.

Thank you for your time,

Barbara Skehan

White, Ralene

From: riverrun [riverrun@earthlink.net]
Sent: Wednesday, June 02, 2010 3:05 PM
To: Draft Validation Guide Comments
Subject: proposed changes to HACCP and meat processing facilities

In regards to proposed changes to HACCP requirements affecting meat processors:

Parts of this country are finally acquiring small meat processing facilities which support small farms and local food production. This is an import - actually CRITICAL - component of our local food system infrastructure. The proposed changes to require microbiological testing will be devastating to small facilities, and will crumble this infrastructure. Small livestock farms will be lost along with them.

Don't let this happen. Don't penalize (destroy) small meat processors who are keeping our clean, local, and healthy food sources alive. There is not a safe food crisis at these facilities. Don't put small meat processors and small farms out of business. Don't destroy our safe and local food sources. Don't destroy our local rural economy and landscape through one-size-fits-all regulation that does not fit all:

**Sincerely,
Alice Begin**

**River Run Farm
Dover-Foxcroft, ME**

Rhodes, Suzette

From: Kristin Hogquist [hogqu001@umn.edu]
Sent: Friday, May 21, 2010 7:24 AM
To: Draft Validation Guide Comments
Subject: FSIS rules

I am writing to express my grave concern about the new proposed rules of the Food Safety and Inspection Services division of the USDA. These new rules will require expensive testing on each meat product, and this will have a devastating effect on small meat processors. The consequence of this is that my family will not be able to purchase meats from the small single family farm that we have been buying from for years, and whom we trust to provide quality meat products.

I suspect your rules are intentioned to provide greater meat safety, but in fact may have exactly the opposite consequence. We enjoy the security of buying meat products not tainted by being processed at the larger plants that have been associated with so many food safety breakdowns. Does the USDA have ANY evidence that small processors are a danger? I understand that small processors are licensed under a state equal-to system that has the built-in safety of limiting any problems. As far as I can tell, federal inspectors do not have the power to stop slaughter at large processing plants when they do see a problem, so these expensive new rules, which will put small processors out of business, will have the effect of forcing meat to be processed at large plants, which are clearly the source of the recent problems.

Healthy, wholesome, local meats are important to my family. We want to enjoy products that are humanely raised and slaughtered. Please reverse these new rules and allow small meat processing plants to flourish, which will support local farmers and local rural economies.

Thank you for considering this request.

Kristin Hogquist
1911 Ashland Avenue
St. Paul, MN 55104
(651) 646 3181
hogqu001@umn.edu

Rhodes, Suzette

From: Marguerite Martin [marguerite.martin@gmail.com]
Sent: Monday, May 17, 2010 6:59 PM
To: Draft Validation Guide Comments
Subject: comment

Hello,

I am writing to comment on my concerns about the Draft Validation Guide for slaughterhouses. I am concerned particularly with the small, independently owned slaughterhouses that I appreciate and do business with. Each year, I purchase beef that has been raised on grass and is then processed by a small slaughterhouse located in Scottsbluff, NE. I love this beef. It has incredible flavor and tenderness. I feel safe about the beef. I am not excited with the prospect that the business will be subjected to what sounds like onerous expensive testing which could result in their closure.

There are too few small slaughterhouses as it is, please do not make it even harder for them to continue in business. Please consider placing limits within the guidelines that have an increased level of scrutiny for those businesses that have had problems with regulations in the past or who deal with a larger number of carcasses per day.

Thank you for your consideration,
Meg Martin
1115 Ashford Drive
Cheyenne, Wyoming 82007

Rhodes, Suzette

From: Lyle Steinfeldt [lylestein@msn.com]
Sent: Friday, May 21, 2010 10:27 AM
To: Draft Validation Guide Comments
Cc: shop@pasturesaplenty.com
Subject: New rules for meat processors

May 21, 2010

Mr. Tom Vilsack
USDA Secretary

Dear Mr. Vilsack,

I received a communication from my local meat supplier that new rules are being considered by the Food Safety and Inspection Services for small meat processors which would result in them being unable to supply me with healthy wholesome meats. As my local supplier understands it, the meat processor plant would be required to submit their products to as many as thirteen tests per product which would be very expensive for them. The added expense would make it prohibitive for my local farmer to sell me meats at a "reasonable price".

I am a product of your campaign to "Know Your Farmer, Know Your Food". I have come to depend on my local farmer for quality meat products. I want that to continue. Therefore I am opposed to new rules which would make it impossible for me to obtain meats from my local farmer.

I don't exactly understand these new regulations. I went to a local supplier because many of the large meat packing companies had problems with tainted meat. I have yet to hear that small meat processors are a big threat to me or the public at large. It seems that if any new rules are to go into effect, they should affect large meat processors who seem to be more of a threat to the general public.

Sincerely,

Lyle Steinfeldt
4430 Arden View Ct.
Arden Hills, MN 55112
651-639-9963