

chefs collaborative

local. sustainable. delicious.

June 17, 2010

Docket Clerk, FSIS
Room 2-2127
5601 Sunnyside Avenue
Beltsville, MD 20705
DraftValidationGuideComments@fsis.usda.gov

Re: Comments - Draft Guidance on HACCP System Validation

Dear Mr. Almanza:

Chefs Collaborative respectfully submits these comments regarding the Draft Guidance on HACCP System Validation that were publicly released on March 19, 2010.

Food safety is a top priority for Chefs Collaborative, a national network of more than 6,000 chefs and food producers and one of the founding chef voices in the local, sustainable food movement. Chefs around the country count on being able to source meat and poultry from small, family operated farms with a commitment to producing safe, high quality products.

While the proposed new rules may well be necessary and reasonable for industrial-scale slaughter facilities, we feel that they would be onerous and redundant for the independent operators that deal directly with farmers. The well-recognized, long-standing food-safety processes, already followed by these operations, consistently result in the production of safe meat products.

The microbiological testing that may be required by this validation initiative would be extremely costly to small facilities – and would likely drive thousands of them out of business. We urge the FSIS to create rules that are flexible with regard to scale. What is appropriate for a facility that kills thousands of animals a day, often mixing their meat, is not appropriate for small- and mid-scale operations.

The availability of meat and poultry that is humanely-raised using environmentally-sustainable methods is vital to a robust food supply and has tremendous value. Unfortunately, this initiative may result in independent processors that produce a wide variety of meat products going out of business – unnecessarily. And, thousands of chefs across the country would have greatly reduced access to sustainably produced meat. That would be a travesty.

We respectfully request that the Draft Guidance on HACCP System Validation be revised to clearly state that no in-plant microbial testing is required when an establishment is following the long-standing,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.

Chefs Collaborative appreciates the chance to comment on the Draft Guidance on HACCP System Validation. Thank you for your time and consideration.

Sincerely,



Melissa Kogut
Executive Director

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