

Date : October 9, 2005

To: United States Department of Agriculture

Subject: Comments on Financial Impact on Very Small Meat Plants

To Whom It May Concern

I own a very small meat plant which produces approximately 85% of its products as custom exempt products and 15% as products for sale. I produce approximately 1000lbs of product a month which is sold out the front door, and I do not deliver. I employ 3 people besides myself; however, I have to go by the same HACCP regulatory requirements that a plant which produces millions of pounds of product a year and employs hundreds of people has to go by. We run a very clean business, if we didn't we wouldn't have any business because we sell to our local friends and neighbors, we do not ship out of state or all over the country.

We implemented HACCP in January of 2000, which was a very costly initiative, but the costs didn't end there. Ever since then we have had to continually change our HACCP plans because of new regulatory requirements that mostly effect big plants or because Inspection didn't like the way something was worded. The HACCP plan was supposed to reflect what we thought was a potential hazard in our plant, but it has turned into having to change it everytime a different Inspector comes by because something isn't worded like they like. It has turned into a financial and an emotional nightmare. I do not bring home but \$300.00 a week, but I am supposed to pay a consultant thousands of dollars a year to make sure my HACCP plan is adequate. It seems that our government isn't concerned if we have a clean plant or not anymore, just as long as our written plans and our daily paperwork is correct. Paperwork covering such things as product smoking temperatures and cooler temperatures, which we were keeping up with before HACCP, but now we have to hire someone to put it into writing to suit the government. The small business man is what made this country what it is, but with all the requirements that the government is putting on us, we are a dying breed. Is that what the large plants and the government wants, to put us out of business, because that is exactly what is happening.

We are located in a very rural area where most of the people bring home less than \$200.00 a week. These people are going to buy meat where it is the cheapest, most at the local grocery store. A grocery store that can do everything that I can do but who doesn't have to bear the costs HACCP plans and who doesn't have to bear the cost of testing their products. A grocery store that can sell their products cheaper than I can buy them from a supplier. Again, has HACCP had a financial impact on me, a very small meat plant owner, YES.

We also kill on the average about 2 animals a month which requires inspection but we are required to test 13 animals a year for generic e.coli at a cost of over \$700.00, even though we or no other very small plant that we know of has ever had the first complaint that our

products made anyone sick. But the big plants have, so make them follow HACCP requirements and take them off of us. Do you think that all this doesn't financially impact us. We would be better off not to kill anything.

I am not attacking anyone, I just want to be heard. I believe like every other small plant owner that unless something changes, our own government is going to put us out of business because we can not afford to go by regulations that are written for large corporations. Someone somewhere needs to look at this realistically for a change. As long as we run a clean establishment and we haven't had any complaints, why do we need HACCP plans and testing?

The truth is that I am not a very educated person and I had to get someone to help me write this letter so I didn't look like a poor old dumb country boy, but uneducated or not I know what clean is. I know how to produce a wholesome product and isn't that what this is all about? So, put the burden where it belongs on the big companies that sell the most product, and take it off the little man, before the little man is gone.

Sincerely,
E.L. Roberson, Owner
Roberson's Abattoir