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Windsor Meat Market  
 73 W. Main St.  
 Windsor, PA 17366

Docket Clerk US Dept Of Agriculture  
 Food and Safety  
 300 12th St. SW  
 Room 102 Cotton Annex  
 Washington, DC 20520

Sir:

In regards to your request on cost of HACCP to small plants I have no exact figures. I just know that it has been very costly in man hours.

To start I spent \$1,000.00 for classes plus motel and travel cost. Spent many hours drawing up my HACCP plans after searching different sites for layouts of other plans such as Penn States meat lab. Every time I think I have things right you change things, making it necessary for us to make corrections. (more man hours spent)

A CSO came to my plant recently to go over my plans. Another 3 days spent rewriting things. Every time one of your inspectors goes over my plans they seem to find something they want to change, the last inspector had 3 changes to make. he could have cared less that a CSO had just made changes.

You came out with E-coli intervention. I had scientific data from University of Wisconsin on dry cooler aging, to be told it was unacceptable and could not use it. I ended up spending \$1,000.00-\$1,200.00 to have my plumber put in a new hot water line direct from my broiler for 165 degree temperature water.

We have all these forms to keep record of daily cooler temperatures and temperatures of hot water for E-coli wash down that are useless. The only time there would be a problem with temperatures are if you would have a breakdown in equipment. Other wise temperatures should remain consistent.

We have been doing E-coli testing since 1998. Last week our inspector told us we need more information than what was supplied to us by 3M with our first order of Petri film. He said we need to have the pages listed on their papers to be complete. I search for 3 hours to find them on the Federal Register. The following day, after looking at them I was informed that these didn't have the information on that was needed.

The expense of man hours spent to make constant changes and keep useless records are ridiculous and runs into ten's of thousands of dollars. No one in the USDA seems to know what they are doing. Everyone wants something different. Training should be done all the same. The only thing I feel did any good was the classes I attended on bacteria. The record keeping is nothing more than a waste of wood that it takes to make paper.

Small plants operate differently then large. They know who to blame if things aren't right. They have so few employees. Management over sees the operation on a whole.

Sincerely,

  
 Barry L. Smith

Docket # 05-0247