

McLemore's Abattoir  
1912 Center Dr.  
Vidalia, GA 30474  
October 10, 2005

United States Department of Agriculture  
Food Safety & Inspection Service  
Washington, DC  
[quita.bowmanblackwell@fsis.usda.gov](mailto:quita.bowmanblackwell@fsis.usda.gov)

RE: HAACP's Financial Impact on Small and Very Small Meat Plants

To whom it may concern:

We were asked to write about HAACP's financial impact on our small meat plant. Our meat plant is a family owned and operated business which has been in operation for over 50 years in Vidalia, GA. We usually employ 7 to 8, and at most, 10 people, including ourselves. Our establishment performs slaughter, and we market and sell our products locally. In addition, we perform custom slaughter for individuals. We do not ship products out of state. Because it is so difficult to get good, quality, reliable, and reasonably priced help these days, we, the small plant owners, have to do a lot of the work ourselves. This is necessary for us to remain in business.

HAACP has been very costly for our small meat plant. Initially, I, as one of the plant owners, attended the required certification classes that were held at the University of Georgia. The cost of these classes including registration, food, lodging, and travel expense, was more than the plant had expected to pay; this alone was very costly to us. We were led to believe then that HAACP would be individualized for each separate plant. Now we find that we are all having to comply with the same rules and regulations, regardless of our plant size and situation.

A current major concern of ours is the many hours of clerical work that we must do each day to complete HAACP's forms, logs, documents, and reports. Again, we can either pay an employee to do this, or, to cut costs, we can do it ourselves. We do it ourselves. This takes away from the time we should be spending taking care of our meat business. And, the amount of paper work and the time spent completing it seems to always be ever increasing, never decreasing. HAACP requirements have caused our day to day operation to become unnecessarily complex. Are all HAACP requirements really required? Can't the paperwork be reduced and simplified, not increased and complicated? This would certainly reduce our expenses considerably. Also, if all HAACP paperwork is not done exactly and precisely, inspection can be withdrawn from an establishment. This would be totally devastating financially to our small plant.

Another example of the increasing cost, to our plant, due to HAACP, is the cost of the 13 required E. coli tests done annually. These 13 tests cost us approximately \$650.00 each year, a cost which has consistently risen, not decreased, from an initial annual cost of \$150.00 a few years ago to the current price of \$650.00. To put this in terms that we, in this business deal with, we have to sell 6 #1 hogs, each weighting approximately 230 pounds and each costing about \$115.00, just to pay for these required E. coli tests. In addition, the number of pork and beef samples sent off each month has risen drastically. A few years ago, one sample a month was sufficient. Currently we send off as many as 4-5 samples each month. Granted, this testing is done at the state's expense, but it is our prepared products that are being sent off, and this, too, adds up and takes away from the amount of product that we have to sell to our customers.

At present, plant modifications and changes, based on HAACP's requirements, cost us approximately \$1200.00-\$1800.00 each year. We understand that some changes are necessary, but there always seems to be something else HAACP requires us to do or change. The constant changes in HAACP's regulations cause us to continuously have to change our HAACP plans one way, then another, to the extent that we no longer feel secure with our HAACP plan. This costs our small plant time and money. It seems that what is all right one week is unacceptable the next. We are puzzled as to what the next changes will entail.

HAACP has added additional and unnecessary expense by duplicating procedures and regulatory requirements, many of which were previously covered and controlled sufficiently by SSOP's, and GMP's. It is becoming more and more difficult to run our small meat plant efficiently and effectively each day while doing everything that HAACP demands. We would simply like to continue producing a wholesome, quality product using the same good sanitation procedures that it takes to achieve this, without all the red tape and extra expense that HAACP requires.

Sincerely,

Gene McLemore  
Sue Ellen McLemore  
Bill McLemore