
From: yawn meats [yawns3@alltel.net]
Sent: Tuesday, October 11, 2005 1:29 PM
To: quita.bowmanblackwell@fsis.usda.gov
Cc: jack.kingston@mail.house.gov; sandord.bishop@mail.house.gov; jim.marshall@mail.house.gov
Subject: Comment on financial impact of HACCP on Small and Very Small Plants

Dr. Quita Bowman Blackwell, Director
Directives and Economic Analysis Staff,FSIS
U.S. Department of Agriculture

Ms. Blackwell,

Attached is my letter that I talked to you about this morning. I am also faxing a copy. Thank you for your time this morning. I would appreciate your consideration of this matter. You may not have heard from many plant owners, but I assure you, that if they were to be contacted by phone, you would hear the same from them as I have stated in my letter. We are all affected by this to drastic points. Some to the point of closing.

Wendell Bullard
Owner
Wendell's Enterprises
dba Yawn Meats
McRae, GA 31055

Phone # 229-868-6161

October 11, 2005

U. S. Dept of Agriculture
Food Safety and Inspection Service
Washington, DC

RE: Hazard Analysis Critical Control Point (HACCP)

Dr. Quita Bowman Blackwell, Director:

Yawn Meats is a Wholesale and Retail Meat operation located in McRae, GA. It has seven employees. It has been in business for over fifty years. Our operation slaughters between 30 and 50 hogs each week, depending on the demand. We are located in an economically depressed and distressed area in rural South Georgia, where the economy has suffered the loss of over 1500 jobs alone in Telfair County. Our plant uses local hogs from farmers in our area. So while we may only employ seven people, local farmers also depend on a portion of their income by selling their hogs to us. I am writing this letter to ask that you consider the plight of the small and very small plant owners that are regulated by HACCP. These regulations cause undue hardships and financial burdens that can no longer be borne by these plants.

At the onset of HACCP, I as very small plant owner, attended no less than five certification classes that were

10/27/2005

conducted with food scientists from the University of Georgia. HACCP was, at that time, to be individual plans for each plant. The cost of this time away from owners' plants in productivity, travel, motel rooms, registration and expenses was far greater than what was proclaimed by the Office of Budget and Management. The additional labor required to manage and document the requirements of HACCP has also been an increased economical burden to our plant.

In addition to attending classes, I was one of the first very small plant owners to implement a HACCP. I initially felt that being able to say that Yawn Meats complied with HACCP would be a great selling point for our product to the consumer. However, I have not experienced an increase in sales. These documents, forms and plans have been changed many times, not to create a different result in the product, but only to create different wording on these forms. These inconsistencies of reviewers have now made HACCP a "Game of Words."

Today, HACCP is no longer an individual plan for each plant, instead it is one plan that all plants must adhere to. This is another undue burden to plant owners for the simple fact that plants do not have the same physical floor plans. Additional, now 24.78 percent of the man hours used in our very small plant are allocated to the documentation of HACCP records and requirements. In real dollars, this cost is over 31 percent of our payroll dollars, simply because of the fact my higher paid employees must perform these tasks due to the technical nature and expertise required. I can produce the actual documentation on these dollars spent.

HACCP initially was a plan that dealt with basic handling procedures for food safety issues and practices through consistent formulations and procedures. These formulations and procedures guaranteed a quality product that was recognized as being safe for consumption. Today's HACCP does not except those procedures as food safety. Today FSIS requires costly lab tests, not scientific data as they proclaim, to meet requirements of FSIS regulations. Let's remember the grocery stores, where none of these lab tests are required. These grocery stores produce the same products as the small and very small meat plants. Also, remember the small and very small meat plants produce less than 10% of the volume as retail grocery stores.

Most very small plants produce the same products as grocery stores and receive these beef products from the same suppliers. But still, these very small plants are required to monitor, verify and have a pre-sale validation on every batch of product produced. Grocery stores that produce these same products are not required to do any documentation. So not only are these plants now having to absorb costly and labor intensive requirements, they are competing with grocery stores who are not under the same scrutiny, but sell the same products to the same consumers. These very small plants are basically pass through plants just as the grocery stores. I feel that if FSIS would evaluate what is being required at these very small plants, it would show that HACCP has failed at the large slaughter operations. If the HACCP plans were working, there would be no reason to retest after a product left these large slaughter and fabrication operations. It appears FSIS discriminates against very small plants verses what's required of grocery stores. To be retail exempt, which the meat inspection acts refers to the words prepared/processed as activities routinely performed by retail stores to be exempt as set in the U. S. Court of Appeals for the District of Columbia Circuit heard on February 9, 1999 in the case of The Original Honey Baked Ham Company of Georgia, Inc., Appellee vs. Daniel R. Glickman, Secretary, United State Department of Agriculture, et. Al, Appellants.

The documentation and testing requirements in smaller plants after the large slaughter plants have already tested and the product has passed all regulations and requirements on testing is not only costly for the smaller plants, it is redundant. It costs Yawn Meats over \$730 each year to have Ecoli testing performed. Initially, this testing was to be for a thirteen week period to establish a base line. This is one of only many tests that we are required to perform. It is now seven years later and we are still testing because of regulations.

HACCP has become a "Game of Words" instead of the actual tasks that are performed in producing a wholesome product. A plant can receive a letter of non-compliance and have it's Inspection withdrawn for as simple a thing as an employee not documenting a temperature on a cooler log sheet. This documentation does not keep the cooler at the correct temperature, it is only a paper trail. Employees who go in coolers frequently, everyday know

immediately upon entering a cooler if there is a cooling problem. Therefore, the food safety issue is still in compliance even if it is not documented. Owners and employees of small plants are able to monitor and control critical issues on a base line level, and correct instances before they become problems.

As a small plant owner, I ask that consideration be made to allow us to continue to produce the quality products we produced before HACCP and that we have continued to produced after the implementation of HACCP, but allow us to do so on a level that does not create an undue burden to the small and very small plants.

Sincerely yours,

Wendell Bullard
Owner
Wendell' s

dba Yawn Meats

Enterprises

CC: Johnny Isakson
Saxby Chambliss
Jack Kingston
Sanford Bishop
Jim Marshall