



# Kuna Foodservice

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September 1, 2005

Docket Clerk. Docket No. 05-024N  
U.S. Department of Agriculture  
Food Safety and Inspection Service  
300 12<sup>th</sup> Street, SW  
Room 102 Cotton Annex  
Washington, DC 20250

**RE: Docket No. 05-024N**

**Notice of a Section 610 Regulatory Flexibility Act Review of the Pathogen Reduction/Hazard Analysis Critical Control Point (HACCP) System**

We at Kuna Foodservice are a small plant that further processes Fresh Beef, Pork, and Poultry for the Hotel/Restaurant trade located primarily in St. Louis and Central Missouri. We do not handle anything other than raw ground and raw un-ground meats and poultry. Our HACCP plans were originally very simple. We originally had only one CCP, which was at the Receiving step of our process.

The economic impact of the HACCP final rule (or rules that keep changing) has had much more of a negative impact than what our company first imagined. Although the Science Based Food Safety plans are working well, the training, writing, implementation, monitoring, record keeping, validation, verification, and continuous rewriting of the plans has taken away from production and management duties. This has cost our small company at least an additional 40 hours per week. What used to be a 3-man plant management team has been made into a 4-man team that needs more help. We are a small plant, and in turn, this relates to between 20-25% of our management's time in increased costs. There are several things that could help Kuna Foodservice, as well as other small or very small plants to reduce the economic impact that HACCP has had.

First of all, each plant must spend the time and money to come up with scientific documentation that can be used over and over again in other plants with similar plans. A database should be established that offers plants the ability to save time, money and frustration in our quest for the proper documentation. Most scientific data that has been documented at universities and colleges is intended for public knowledge. Why should we have to search out the same information when it could be distributed or listed as common knowledge? Much of the information published in scientific journals requires expensive subscriptions to have access to the copyrighted data. With this being the case, the expense does not justify these sources as an option for small plants. If this information was somehow available in a database, it would reduce the expenses surrounding proper scientific documentation for small plants, and make the process easier for both the Agency and the processor. Secondly, we have had far too many changes, rescindings, and personal interpretations that cause an excessive amount of time to be spent on planning the plan, instead of working the plan. It is now more important to cross the "T's" for fear of NR's, than the actual safe production of product. It seems easy for FSIS to evaluate our

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plans as to what will not work, as opposed to aiding plants in finding the correct way to state what the plan aims to accomplish and how to accomplish it. Not only do we need to go back to school for our Science and Microbiology classes, but we must spend time refreshing our English writing skills as well. More assistance on the Inspector's end may solve some of these problems, and building a working relationship between the plant and the inspector to solve problems together would be ideal.

Plants are constantly being told to reassess the things that might have been missed in the plans. I have evaluated our HACCP process for biological, chemical, and physical hazards, and all products are properly labeled per the regulations. However, I must now spend even more time and money to rewrite our plans to *specify* that I have considered allergens. Are allergens not considered biological? The ongoing changes are the expensive parts of implementing HACCP. Again, this illustrates one example as to how HACCP plans are burdensome to plants with their constant writing and rewriting. There must be a better solution for this!

HACCP began with all plants having plans specific only to their operation. With each required change, the plans begin to look more alike. Although it is supposed to be an actively changing plan, there should be a more standardized way to implement the regulations. Each plant must take the time and make the expense of meeting all of the USDA's regulations on our own. Much of these individual expenses could be eliminated with more standardized procedures that might look at the *end results*, rather than the "crossed T's and dotted I's" on how we get there. Surely the USDA can realize the dire need for some standardization and the sharing of data to help eliminate the costs that are too often duplicated from one plant to another. We are spending more time and money on paperwork than that of producing safe foods.

Sincerely,

A handwritten signature in black ink that reads "Michael Neuhaus".

Michael Neuhaus

Director of Fresh Meat Operations, Kuna Foodservice

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