



FoodGroup

GREAT FOOD,
CONCEPTS & SOLUTIONS

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September 23, 2005

Docket Clerk
US Department of Agriculture
Food Safety & Inspection Service
300 12th Street SW
Room 102 Cotton Annex
Washington, DC 20250

Re: Docket number 05-024N

The "Pathogen Reduction/HACCP" rule has had an enormous financial impact on my company. The record keeping is a large expense that just keeps adding up in the expense column. It consumes approximately 30 paid hours per week to manage the paperwork.

Another expense is the need to rewrite the HACCP plan. USDA continues to come up with another reason to rewrite the HACCP whether the directive come from Washington or the Circuit Supervisor or the IIC.

It is very expensive to gain the scientific data necessary to support what I already know from experience (years of operation resulting in safe food products). In our case, it required challenge studies to be performed and consultants needed to be hired.

The largest of expense of all is the rule forced me out of selling raw ground beef hamburgers resulting in nearly one million dollars per year of net revenue. The rule requires me to write a HACCP plan that would eliminate E. coli 0157:H7 from the raw materials I use in my process. Every scientific expert in the nation agrees that this cannot be done. The steps that are available are too costly, present food safety risks themselves and result in a finished product that is too expensive to be sold and still are not 100% effective. Radiation therapy and chemical treatments have not been found to result in 100% elimination of E. coli 0157:H7. This loss of revenue is crippling to my business and will result in a significant loss of jobs.

Sincerely,
Joe Maas
Vice President