

Woods Smoked Meats, Inc.

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Sweet Betsy from Pike



INTERNATIONAL GRAND CHAMPION
SMOKED MEAT PRODUCTS

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September 26, 2005

Docket Clerk
USDA
Food Safety & Inspection Service
300 12th St. SW
Room 102 Cotton Annex
Washington, D.C.20250

Re: Financial impact of HACCP regulations on small plants

Dear Sir or Madam:

The impact of the regulations established by the Pathogen Reduction/HACCP Act has been absolutely overwhelming. Not only from a financial burden on small plants, but the emotional, psychological, stressful and mental strain on management and key employees is truly more than a small business should bear.

First, we had to pay for the HACCP training expense. Next, we wrote our HACCP plans, hired a consultant to help us tailor our plan to match our plant, thought we were good to go. The USDA reviewed our plan, said it was no good, so I threw it out, wasting the money spent on training and the consultant, then copied the model plans off the USDA website, which the USDA then said was great.

So after four years into the HACCP routine, we make the same products as we did before, only they cost a lot more to produce because of government regulation and intervention. Having to set up forms and procedures to monitor temperatures, SSOP, kill floor procedures, receiving log, smokehouse log, mid-day sanitation logs, production sheets and logs, thermometer calibration logs, pre-shipment review forms, 6 HACCP plans, new computers, 2 file cabinets, 3 thermometers, trips to St. Louis, Columbia and Kansas City for workshops, and the hundreds of microbiological tests has been a little costly to say the least.

All of this in the name of food safety, thank God the USDA is here to save us all. HACCP in small plants that make from 75 to 125 different products, that also slaughter, process and have a retail store is a logistical nightmare. From the initial HACCP implementation to the CSO reviews, the e-coli reevaluation, the listeria evaluation, the EIAO review, and now the shelf- stable product reevaluation, the paperwork and stress level is unbearable.

I can't afford to hire a college graduate to run my HACCP program, so I do the paperwork during business hours, after hours, weekends, it is a true monster. I'm the business owner, so I have to perform these tasks, I don't like it, but I have no choice.

In time, equipment purchased, and money spent on HACCP the last six years by Woods Smoked Meats would exceed \$100,000. That is about 1.5% of our total gross revenue. To me that is government control totally out of hand. Do we have a better product now? No, but we have a more costly one to the consumer. We have been under the control of the USDA since 1972 and I know of no other government agency that creates more expense for small business while at the same time wasting its own budget on bureaucratic red tape and total inefficiency.

Yours truly,

WOODS SMOKED MEATS, INC.

Edward T. Woods

Edward T. Woods
President

ETW/rw