

FSIS RegulationsComments

From: Tim Houghton [tim@alexander-hornung.com]
Sent: Monday, October 10, 2005 10:06 AM
To: fsis.regulationscomments@fsis.usda.gov
Cc: Bernie Polen
Subject: Comments on Pathogen Reduction/HACCP final rule (docket number 05-024N)

To: USDA-FSIS
From: Tim Houghton
Alexander & Hornung
Date: October 10, 2005
Subject: Comments on Pathogen Reduction/HACCP final rule (docket number 05-024N)

We believe HACCP is a fairly good system that works when implemented properly. Some of the processors that had questionable food safety practices before HACCP are no longer in business, and this is likely a good thing for the industry overall.

Financially, HACCP is a burden due to the large amount of paperwork and record keeping required. At least one full time person needs to be hired for this job, and that typically has a negative economic impact on a small processor or packer since monetary resources are limited. However, if establishments were conscious of food safety before HACCP, some controls should already have been in place and the financial impact would have been lessened.

One issue that we find perplexing is the USDA still tends to hold on to the old "command and control" policies. This can be frustrating, since we are frequently reminded that HACCP "is our plan." If the plan truly is ours, then more control should be put in the packer or processors hands with science (microbiological sampling) being the judge. USDA still does a lot of the traditional inspection tasks, which should theoretically be unnecessary if the presence or absence of pathogens designates the establishments standing. The same thinking goes for IIC overtime. Why should plants pay for overtime when they have a successful HACCP plan in place? A good history (one year for example) should negate the need for the IIC being paid after her or his normal eight hour shift.

Thank you for the opportunity to comment on regulations established by the Pathogen Reduction/HACCP final rule. We hope our input is of value to your organization.

Tim Houghton
Alexander & Hornung
tim@alexanderhornung.com