



IOWA DEPARTMENT OF AGRICULTURE AND LAND STEWARDSHIP

Bill Northey, Secretary of Agriculture

April 12, 2010

Tom Vilsack, U.S. Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Secretary Vilsack:

I am writing to share with you concerns I have been hearing from Iowa meat processors about the Draft Guidance: HACCP Systems Validations that was released by the USDA Food Safety and Inspection Service on March 19, 2010.

As you are well aware, the Iowa Department of Agriculture and Land Stewardship is responsible for implementing Iowa's cooperating agreements with USDA/FSIS to provide meat and poultry inspection that is "at least equal to" the federal requirements. The major difference is that state inspected products are not allowed interstate commerce.

I share the concerns of these Iowa processors that the proposed reinterpretation of the requirements will add substantial new cost that will have a disparate impact on the small and very small meat plants located in and serve our rural communities. These plants typically slaughter more than one species of livestock and often produce a wide variety of products under several different HACCP systems. Often large plants have fewer HACCP plans than small and very small plants because they produce large volumes of fewer products.

It is also unclear to me the food safety benefits that would result from the substantial new costs for these plants. HACCP was designed to prevent, reduce or eliminate food safety hazards at Critical Control Points and requires processors to document their food safety procedures. These processes have already proven that the implementation of HACCP is effective in making our meat supply the safest in the world.

In addition to these costly new requirements, FSIS has also indicated that they will require that all pre-requisite programs, such as plant sanitation, cooler temperature monitoring and pest control programs to be validated under the same protocols outlined in the draft guidance. These programs are numerous and validating these will also add substantial new costs.

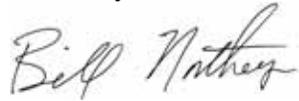
The manner in which this major regulatory re-interpretation was undertaken is also a cause of concern. Since the draft guidance is considered a re-interpretation and not a new rule, it does not follow the same rule making process and allow for the same scrutiny as typical regulatory changes. In particular, there is no opportunity to have this new interpretation reviewed by the Small Business Administration to determine the financial impact on small businesses.

In conclusion, I would just add that small and very small meat plants are a vital part of many of our rural communities and our rural economy. I have serious concerns that this re-interpretation will impact their ability to stay in business and continue serving as a vital link between farmers

and consumers. I commend your efforts through the “Know your Farmer, Know your Food” initiative to support small, local food producers, but I worry that these proposed guidelines could significantly setback the goals of that initiative.

Thank you for your consideration. Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Bill Northey".

Bill Northey
Iowa Secretary of Agriculture