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March 23, 2010

Mr. Alfred Almanza
Administrator, USDA - Food Safety and Inspection Service
1400 Independence Ave, SW
331-E Whitten Building
Washington, DC 20250

Dear Mr. Almanza:

On behalf of our membership, the American Association of Meat Processors (AAMP) respectfully requests that the Food Safety and Inspection Service (FSIS) extend the comment period regarding the draft compliance guide on HACCP systems validation that was recently released by the Agency through the FSIS Constituent Update (Volume 12, Issue 10 - March 19, 2010).

FSIS has designated a 30-day comment period for the draft compliance guide on HACCP systems validation, and asked for comments on this very extensive issue. AAMP would like to see the Agency extend the comment period for at least 60 additional days to allow small and very small plants sufficient time to develop and submit comments.

As you know, AAMP has been aware and concerned about this issue since October, 2008. It was almost 6 months to the day that all of meat trade association meet with you regarding the validation issue. Due to the complexity of this issue, it is understandable why it took so long for the Agency to respond to our association letter. It is due to that same complexity that it is difficult to understand why the Agency would only give the industry 30 days to respond.

Moreover, the affected group of independent very small and small processors may not even see this information in that shortened amount of time. It is my hope that the industry will receive, review, and respond to the guidance document. We have already extensively dispersed the guidance document to AAMP members and other industry stakeholders. It should be noted that approximately 50% of the inspected industry is not a member of any trade association. Therefore, they may not see this guidance document if they are not made aware of its existence. If the Agency wants comments on this guidance, more time would be provided and instruct their field inspection personnel to provide access or a copy of the guidance information at the weekly inspection/establishment meeting that occurs at each establishment. Furthermore, since state meat inspection programs would most likely have to comply with the same validation requirements to maintain their equal-to status, AAMP encourages the Agency to communicate more specifically with the state meat inspection programs to receive comments at that level as well.

AAMP has already received numerous calls from members and non-members that this issue already makes it look like the Agency wants to run the remaining inspected (state and federal) independent very small and small processors out of business. By rushing the process, not announcing the issue more than a page three article in the Constituent Update, and not making the information readily available to the industry...this is making those same processors "validate" that FSIS doesn't want them under inspection.

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AAMP believes that it would benefit constituents to extend the comment period and offer additional time regarding the seriousness of this issue. Offering additional time for them will ensure that all interested parties have the ability to comment appropriately.

The American Association of Meat Processors will be submitting comments on behalf of our members and continue to encourage our members to submit comments as well. Depending on how the validation guidance is interpreted, it may significantly impact all state and federally inspected establishments. Therefore, AAMP is respectfully requesting that FSIS allow for sufficient time to gather comments that will aid in the development of effective and efficient validation guidance. Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads "Jay B. Wenther".

Jay B. Wenther, Ph.D.
Executive Director
American Association of Meat Processors

cc: Tom Inboden, AAMP President