

Farm and Ranch Freedom Alliance  
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The Farm and Ranch Freedom Alliance (FARFA) submits these comments on the USDA FSIS's proposal regarding salmonella testing of ground beef.

FARFA is a nonprofit advocacy organization that supports independent family farmers and protects a healthy and productive food supply for American consumers. FARFA promotes common sense policies for local, diversified agricultural systems.

FARFA supports efforts to address the increasing number of illnesses due to salmonella in ground beef. But we believe that the current proposal will not make a significant improvement in the problem; and, at the same time, it will impose undue burdens of small-scale processors who are not the main source of the outbreaks.

The underlying problem is that salmonella is not an adulterant under the Federal Meat Inspection Act. As a result, FSIS's salmonella testing regime is not structured to identify meat that has pathogen levels to threaten human health. Instead, FSIS uses these tests as a process verification procedure, to determine if the facility's process controls are adequate.

As a result, the testing is both overly burdensome and inadequate at the same time.

The tests use an enrichment process that detects bacteria at such a low level that it poses no human health threat. The tests also do not discriminate between strains that pose human health threats and those that have not been linked to illnesses in humans. A positive test result thus does **not** mean that the processors' meat is unsafe for human consumption.

When these tests come back positive at a large processing plant, the facility's team of attorneys and consultants deals with FSIS's subsequent actions in ways that may or may not actually improve the safety of the final product. When the tests come back for a small plant, however, the plant owner is quickly buried in paperwork. Ultimately, a small processor may have its grant of inspection revoked over bacteria that posed no actual human health threat, simply because the processor lacked the legal expertise and political power to manage the agency's response to the testing results.

In sum, this testing regime does little to stop large processors from selling contaminated meat, but it does threaten small processors with being "HACCP'd to death."

We recognize that FSIS's proposed changes apply to facilities that process 50,000 lbs or more per day. However, even some small facilities process that quantity (they simply don't do it every single day of the week). And using the same testing frequency for plants that process 50,000 lbs/day and those that process 1 million lbs/day creates a clear disproportionate impact on the small processors.

The processes implemented by small establishments are different than those used by the largest establishments, but they are just as good if not better. While it may be convenient for FSIS to view all establishments as equal, they are not. Apples and tomatoes are both round red fruits. They are not equal. The proposed change ignores important differences between the smallest and largest spectrum of the industry, in the nature of their processes as well as the quantities they produce.

FARFA thus urges the agency to:

- 1) Separate processors into categories based on the processing methods, and then test every X pounds of product with each category. In other words, the sampling frequency should be based on the different types of processors and how much meat they process.
- 2) Differentiate between the mere presence of Salmonella or other bacteria and their presence at levels sufficient to cause human illness.

Small processors already have high levels of food safety measures and much greater traceability than the large ones. In the interests of long-term food safety, FSIS thus needs to ensure that its current and proposed testing regimes do not unduly burden small processors.

Sincerely,

A handwritten signature in black ink, reading "Judith McGeary". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Judith McGeary, Esq.  
Executive Director