

Farm and Ranch Freedom Alliance  
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Via e-mail: [meat.regulatory@dshs.texas.gov](mailto:meat.regulatory@dshs.texas.gov)

September 26, 2020

Re: Comments on Proposed Rule 20R013

Dear DSHS Meat Compliance Unit:

The Farm and Ranch Freedom Alliance 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 submits the following comments on the proposed rules for meat processing.

#### **I. Section 221.14: Low-volume poultry and rabbit processing**

FARFA applauds the agency for amending the regulations that govern low-volume poultry and rabbit processing on-farm. We support the proposed changes to remove the requirement that the farmers build a facility and operate in the same manner as if they were a commercial slaughterhouse. We also support the agency's shift from requiring a pre-inspection to a complaint-driven inspection model for these small farms. FARFA believes that these changes make the regulations accord better with both the language and the intention of the statute.

The proposed additional labeling requirements are reasonable. We encourage the agency to take an "education first" approach to help small farmers become aware of the new labeling requirements before issuing citations or taking other enforcement action.

#### **II. Section 221.16: Fees for state-inspected meat processors**

FARFA is concerned about the proposed increase in overtime fees for state-inspected meat processors.

We recognize that DSHS is facing very serious and difficult financial challenges. However, our farmers are facing a crisis from the lack of inspected slaughterhouses. Many USDA- and state-inspected processors are booked all the way through the summer of 2021, if not later. As a result, farmers are unable to get their animals processed and are facing the prospect of continuing to feed and care for their animals without income from the sale of the meat.

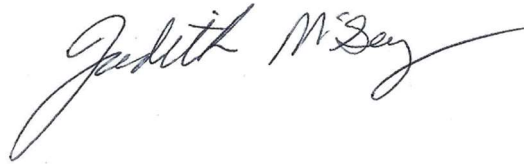
As a result, Texas farmers and the consumers who rely on them for meat need state-inspected processors to *expand* their operations. Doubling the fees that they are charged for overtime is a disincentive to this important service.

The proposed increase in fees for overtime are also troubling because of the provision that fees include the time the inspector spends traveling to the processor. This effectively penalizes processors who are located further from DSHS offices. Yet farmers and their consumers are best served when there are numerous processors located all over the state.

In addition, while the agency notes that overtime is only incurred for those slaughterhouses that “choose” to work longer hours, that doesn’t take into consideration that handling large livestock is an inherently unpredictable business.

Again, we recognize the budgetary challenges facing the agency at this time. But we urge the agency to reconsider the proposed fee increases, either entirely or partially.

Sincerely,

A handwritten signature in black ink, reading "Judith McGeary". The signature is written in a cursive style with a long, sweeping tail on the "y".

Judith McGeary  
Executive Director