



THE WESTON A. PRICE FOUNDATION®

for **Wise Traditions** in Food, Farming and the Healing Arts

Education ♦ Research ♦ Activism

Dr. Mindy Brashears
Under Secretary for Food Safety
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Paul Kiecker, Administrator
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Dr. John Linville, Director
Policy Development
Food Safety and Inspection Service
U.S. Department of Agriculture
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Via facsimile

May 5, 2020

Dear Under Secretary Brashears, Administrator Kiecker, and Director Linville:

The Weston A. Price Foundation urges you to issue an emergency order suspending the rules against the intra-state sale of meat from animals slaughtered and processed at a custom exempt facility under 9 C.F.R. 303.1(a).

The Weston A. Price Foundation (WAPF) is a nonprofit founded in 1999 to disseminate the research of nutrition pioneer Dr. Weston Price, whose studies of isolated non-industrialized peoples established the parameters of human health and determined the optimum characteristics of human diets. Dr. Price's research demonstrated that humans achieve perfect health generation after generation only when they consume nutrient-dense whole foods and the vital fat-soluble activators found exclusively in animal fats. Our 10,500 members prioritize high quality animal foods as a vital part of their diet and health.

We face a crisis in our country due to the combination of extreme consolidation in our meat supply and the impact of COVID-19. The recent shutdown of some of the largest meat packing plants in the country due to COVID-19 illness among plant employees has led to looming meat shortages for consumers in the coming weeks and months. Even if these plants re-open due to the President's Executive Order, the continuing threat of illnesses requires that these (and all) plants implement social distancing and other measures that will significantly reduce their production.

Many farmers and ranchers who sold to the affected plants have no other markets for their meat and are facing the loss of their livelihoods. Millions of animals may be euthanized because of the lack of processing capacity, causing impacts to the meat market for an extended period of time.

The agency itself is directly affected. Over 100 FSIS employees responsible for inspecting meat plants have fallen ill, slowing production down and threatening introduction of COVID-19 into plants where there has not yet been an outbreak.

USDA can help mitigate this emergency by suspending the regulations prohibiting the sale of custom meat in intra-state commerce. Allowing the sale of custom-processed meat to consumers both directly and in grocery stores would help the retail sector better cope with the shortages it is experiencing. It would create markets for farmers and ranchers who currently have limited or no access to slaughterhouses.

Custom slaughterhouses have an excellent track record for food safety. Although there are hundreds of these facilities throughout the country processing both game animals and domestic livestock, the number of recalls is miniscule. The major contributor to the risk of contamination in large facilities – their fast line speeds – is not present in these small-scale operations that typically process less than a few dozen head of animals a day.

The small-scale of these facilities is also a significant advantage during this time of COVID-19, since it creates a work environment where it's easier to operate safely while still complying with the necessary social distancing measures.

WAPF urges you to immediately issue an emergency order to suspend the laws limiting the distribution of meat from animals slaughtered and processed at a custom facility to the household of the owner of the animal at the time it was slaughtered, and to allow the sale of such meat intra-state. This will support American consumers and farmers as we weather this crisis.

Sincerely,

A handwritten signature in cursive script that reads "Sally Fallon Morell".

Sally Fallon Morell
President, Weston A. Price Foundation