

From: Robin McConaughy [mailto:robin@fantoo.com]

Sent: Thursday, December 31, 2009 11:44 AM

To: ATR-Agricultural Workshops

Subject: Comment

To Whom It May Concern:

Please see our attached comments pertaining to the upcoming Justice Department Anti-trust workshops.

Thank you for you time.

Sincerely,

Robin McConaughy

Jon and Robin McConaughy
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December 29, 2009

Legal Policy Section
Antitrust Division
U.S. Department of Justice
450 5th Street, NW
Suite 11700
Washington, D.C. 20001

Re: Antitrust, Food Safety, Slaughter Facilities and the Small Livestock Farmer

To Whom It May Concern:

I own a small farm in New Jersey with the main goal of supplying grass-fed meat products to our local community and, more specifically, to open a restaurant in our area utilizing the meat from our farm. The vision is to create a sustainable farm-to-table model that keeps all animals, feed production, labor, energy creation, retail outlets and the restaurant within our community.

Yet there is one missing link that we seek to address: humane and local slaughtering of our animals.

Currently, we must load our free-ranging beef cattle into a trailer, ship them 2 hours or more away from their natural environment and deliver them to a slaughterhouse holding pen. The ensuing stress on the animals often causes what is known as 'browning of the meat', when stress-induced adrenaline increases the pH, resulting in a marked loss of flavor - a fact that has been documented scientifically. After spending a growing season carefully raising beef cattle, rotating pastures, providing sanitary and comfortable environs to stave off infection and stress it is simply unacceptable to then undo all this hard work in the slaughter process.

The second issue with the current model of USDA inspected slaughterhouses is basic quality assurance. Once you bring your cattle to the facility, there is no way to confirm that the A) the cows you raised were treated humanely in the slaughter process and B) the meat you are getting back is actually yours. Small farmers routinely tell stories about getting more hearts and livers back from the slaughterhouse than animals sent. In our experience, we've had the overwhelming impression that many prime cuts were missing when the meat was returned. The fact that the slaughterhouse has its own retail arm did nothing to quell this suspicion. Again, to lose control over the finished product at the very

end of the cycle is one of the reasons that small farmers, artisans in and of themselves, are leaving the profession of farming.

But there are no choices for the small farmer to address these problems unless changes are made to the way farmers can slaughter and process their meat.

The solution is not further centralization of the meat processing industry. Anyone who watches the news understands that large, industrial slaughterhouses are, at their base, profit centers with deep pockets to lobby our government. This industry, as it produces factories that are bigger and more concerned with deadlines than safety and sanitation, is more and more prone to send out contaminated meat. Repeated E. Coli outbreaks and safety violations only support the need for smaller, locally based slaughter operations.

In addition, the fuel used to transport cattle to and from these factory slaughterhouses goes against our effort as a country to gradually lessen our use of carbon footprint. Not to mention the local jobs lost.

Getting back to our farm and to the issue of anti-trust as it relates to USDA-approved slaughterhouses. We are very hopeful that new regulation will be passed to support the creation and use of USDA-inspected mobile slaughterhouses. This option for slaughter would solve all of the issues mentioned above: quality control, meat ownership, stress reduction and reduction in fuel usage. Further, we are studying ways to repurpose the offal materials (blood, skin, bones and other non-edible materials) to make a highly effective fertilizer. It's a win-win for the farmer, the local community and sustainable agriculture in general.

At the end of the day, we realize that there is a place for every slaughterhouse model in this country, as long as it meets safety regulations. We simply ask that lawmakers look deep into the benefits of making small, local slaughterhouses and mobile slaughterhouses accessible from a regulation standpoint. When farming and retail sales are done within the community, accountability follows.

Thank you for your time.

Sincerely,

Jon T. McConaughy
Manager/Owner, Double Brook Farm, L.L.C.