

about 15 percent of all the HACCP plan validations that will occur as a result of the final rule. This number of HACCP plan validations is based on a 50-percent validation rate currently being attained by large establishments, 30-percent rate by small, and a 10-percent rate by very small establishments. These rates are based on information that FSIS obtained from industry sources and in its public meetings related to the proposed rule and Lm risk assessment. Given the high relative numbers of small and

very small establishments whose HACCP plans require validation, the total number of establishments affected is 35.

The major impact of the need for HACCP plan validation occurs in establishments already in EG 2 that have an unvalidated PL treatment (60 percent of all expected validation expenses incurred by establishments that already apply a PL treatment). To calculate this impact, establishments in EG 2 are grouped by the same validation rate used for EG 1

establishments above. To the extent that PL treatments are validated by the manufacturer, validation costs would be lower.

Some validation costs are incurred by establishments in EG 2 that are expected to move into EG 1 (20 percent of the large establishments that currently have a PL treatment and 10 percent of those that do not have a PL treatment in EG 2) and some establishments in EG 4 that are expected to move into EG 1 (10 percent of the large and small establishments currently in EG 4).