

PROKARNA HOLDINGS, INC.

An Open Letter on the President's August 28 Statement | Portland, Oregon | August 31, 2026

TO: The President, Members of Congress, and America's ranchers and independent processors
FROM: James N. Hansen, CEO and Co-Founder, Prokarna Holdings, Inc.
RE: **How to expand rancher-owned beef processing without weakening food-safety protections**

The opportunity and the question everyone will ask

On August 28, the President directed that legal documents be drawn to give ranchers and farmers the right to process their own food. The target is a centralized system in which, per USDA's 2024 slaughter data, 12 plants slaughtered about half the cattle in America, while roughly 900 smaller plants handled the rest. Secretary Rollins has announced actions beginning this week: waiving red tape, expanding interstate sales, support for small processors, and using technology to generate food-safety information more quickly.

One question decides whether those documents survive: food safety. The ranch-scale problem is getting a 1,200-pound carcass from body temperature to a safe cold-chain temperature without a plant-scale chill room. Every prior attempt to decentralize, including custom-exempt expansion and the PRIME Act, has repeatedly run into this decisive, under-addressed point. **Deregulation alone does not meet the cooling requirement; a point-of-harvest cooling method does.**

A practical answer: start cooling at harvest, keep full inspection

Vascular perfusion cooling is designed to remove the chill-room bottleneck. After stunning and prompt bleeding, temperature-controlled saline replaces the blood, begins cooling from the inside out through the animal's own circulatory system, with the outcome verified by continuous time-and-temperature logging. The principle parallels transplant medicine's preservation of donor organs in transit. If validated and authorized, the method could support ranch, sale-barn, or co-op harvest with chilled delivery to a small USDA-inspected plant for dressing, cutting, and packing. Cooling is no longer tied to a building; it begins inside the animal.

This converts the President's goal from a regulatory exemption into a staged, inspectable supply chain:

- **Rancher or aggregator** harvests under inspection at the point where cattle already gather.
- **Pre-processor** (a new, small, licensable facility class) stuns, bleeds, cools, and washes the carcass in minutes.
- **Chill carrier** delivers cooled, washed carcasses to the nearest independent processor (the post-processor), which removes the hide, eviscerates, cuts, packs, and ships under its existing grant of inspection.

Independent processors gain throughput without building kill floors or chill rooms. Ranchers gain a branded, inspected product and a price the big four packers no longer set. Nothing in the chain requires a rancher to become a slaughterhouse.

What the legal documents should say

Four provisions would let this week's actions survive the food-safety review while preserving full inspection. We believe each is achievable under USDA's existing FMIA authority; where rulemaking is required, a pilot can proceed in parallel:

1. **Create a pre-processing establishment class.** Direct FSIS to issue a grant of inspection to pre-processors that only stun, bleed, clear stomach contents, cool, and wash. Hide removal, evisceration, and cut-and-pack are completed at a separately inspected post-processor. Any pre-processor can serve any post-processor. Many-to-many is the definition of decentralization.
2. **Define carcass chilling as a performance standard.** Recognize any validated point-of-harvest cooling method that achieves the required time-and-temperature outcome, documented by continuous temperature logging, in place of a requirement for a stationary chill room. This writes the Secretary's technology-for-food-safety commitment into the rule.
3. **Permit inspected harvest at ranches, sale barns, and co-ops** with in-transit transfer of cooled carcasses to inspected plants, including across state lines.
4. **Name a single accountable FSIS office and authorize a pilot.** Give that office authority to approve a pilot corridor in one cattle state within 90 days. A pilot will move faster than rulemaking and will produce the data the rulemaking needs.

Why we are publishing this

Prokarna is publishing now because the President says the work should move quickly. The point-of-harvest cooling answer belongs in the drafting from the start, not in a later food-safety objection. We are making it public today so competition and confidence in U.S. beef are preserved.

About Prokarna

Prokarna Holdings coordinates and licenses a model that expands small USDA-inspected processors at a fraction of new-plant cost. It is not a packer. Its licensing structure lets ranchers, co-ops, haulers, and processors own their part of the chain. Harvestasis™ is its point-of-harvest cooling platform, with multiple patents-pending. Its science grew from DoD-funded trauma research to preserve life after massive blood loss. Dr. Lyn Yaffe, the Navy physician-scientist who led that research for over two decades, is Prokarna's co-founder and chief scientist. The cattle procedures and plans, and every claim in this letter, are Prokarna's own.