UNITED STATES OF AMERICA

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DEPARTMENT OF AGRICULTURE

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NATIONAL ADVISORY COMMITTEE ON MEAT AND POULTRY

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SPRING MEETING

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THURSDAY, JUNE 16, 2005

The meeting came to order at 8:30 a.m. in the USDA South Building Cafeteria Conference Room, Mary Cutshall, Moderator, Presiding.

PRESENT:

DR. MERLE PIERSON	ACTING UNDERSECRETARY FOR FOOD SAFETY
DR. BARBARA MASTERS	ACTING ADMINISTRATOR, FOOD SAFETY AND INSPECTION SERVICE
MARY CUTSHALL	MODERATOR
DR. GLADYS BAYSE	MEMBER
DR. DAVID CARPENTER	MEMBER
DR. JAMES DENTON	MEMBER
MR. DARIN DETWILER	MEMBER
MR. KEVIN ELFERING	MEMBER
MS. SANDRA ESKIN	MEMBER
MR. MIKE FINNEGAN	MEMBER
MR. MICHAEL GOVRO	MEMBER
DR. JOSEPH HARRIS	MEMBER
DR. JILL HOLLINGSWORTH	MEMBER
MR. MICHAEL KOWALCYK	MEMBER
DR. IRENE LEECH	MEMBER
DR. CATHERINE LOGUE	MEMBER
MR. MARK SCHAD	MEMBER

A-G-E-N-D-A

P-R-O-C-E-E-D-I-N-G-S

8:42 a.m.

MS. CUTSHALL: Good morning. I'm not sure if the microphone's on or not, but I think we're in enough close quarters to be friendly this morning, and you can probably hear me anyway. We wanted to give you a taste of what it's like to work here at FSIS so we're actually in the back of the cafeteria today. You're here where we live, and we appreciate you all coming.

We have a lot of things to do this morning, and we're going to get started in just a minute. To open up, I'd like to introduce to you our Deputy Undersecretary, and he's also Acting Undersecretary, Dr. Merle Pierson. Dr. Pierson is responsible for overseeing the policies and programs of the Food Safety and Inspection Service, and he chairs the U.S. Codex Steering Committee which provides guidance to U.S. delegations to the Codex Alimentarius Commission. Dr. Pierson brings extensive scientific expertise to USDA. He is an internationally recognized HACCP expert, and has done

research on the reduction and control of food-borne pathogens. He's authored or coauthored more than one hundred and fifty journal articles, and coauthored seven books on food safety.

Prior to this appointment, Dr. Pierson served as Professor of Food Microbiology and Food Safety at Virginia Polytechnic Institute and State University. During his tenure at Virginia Tech he served as head of the Department of Food Science and Technology, and Acting Superintendent of the Center for Seafood Extension and Research. A native of South Dakota, Dr. Pierson received his B.S. in Biochemistry from Iowa State University, and his M.S. and Ph.D. in Food Science from the University of Illinois. So if you would, please welcome Dr. Merle Pierson.

(Applause)

DR. PIERSON: Good morning and thank you. Yes, these are tight quarters, and I hope that the temperature doesn't literally rise in here to unbearable conditions. The weather has not been very friendly in terms of humidity and temperature over the past few days here in Washington, D.C., so let's just

trust that our government air conditioning systems work effectively and efficiently.

You know, this room brings back memories of the ?90s when we were talking about HACCP and HACCP implementation and everything. And I won't tell the story that occurred, you mentioned here. But yes, I remember this very room being one where we discussed sundry issues on HACCP, and the large plants, and the small plants, and the very small plants, and all these issues of HACCP. So I don't know if we're starting something anew here or not. But anyway, it's a nice friendly little atmosphere we have here.

I wanted to congratulate the new members on the committee, and certainly welcome back those who have received reappointments. I might say, too, that I really appreciate those who manage this committee and the work that they've done. It's quite a job to get all the appointments through the process, and go through that whole process. You know, you'd think well, gee, just pick a few people and everything will be all right. No, there's quite a lengthy process of consideration as to the backgrounds, and

qualifications, and balance on this committee, and the direction of the committee and everything. And then it goes through a thorough review, all the way up through the department level, and the Secretary signs off on this. So it is a very serious process, and I appreciate the hard work that the coordinators for the committee do.

And I again appreciate your time and your willingness to contribute your time. The pay for this job that you're doing is not very good. I won't say anything about what you file for your income taxes on the reimbursement. I guess it amounts to zero. But the expectations, though, are far beyond that, and we are very, very keen on how the output of this group can effectively help us continue to enhance public health.

The work from the previous committees has provided an important analysis on our common goals for improving the safety of meat, poultry, and egg products. And we've seen excellent progress in developing policies that have worked. We have seen a significant reduction in food-borne illness over the

last few years as reported by CDC. And we all need to work together to continue to drive down food-borne illness and its impact upon consumers. There's much more to be done ahead of us. Yes, much has been accomplished. We must maintain those accomplishments. But we also need to move forward on several fronts. The work is not over. And we cannot let our guard down.

You play such a very important role in many of the issues that are before us. And I see in the table of contents. It's how can FSIS best share information on new technology with small and very small plants. What guidance can be provided to industry to ensure the plants hold product when FSIS tests for an adulterant? How can risk-based sampling most effectively be conducted in small and very small plants? I think just yesterday we had some in-depth discussion on this committee. We were discussing another issue, but then it brought to our remembrance the issues that you have before you on this committee, and the importance of your recommendations, your analysis, to what we are doing on the policy side of

things.

We at FSIS owe it to the consumers to use the best available information and strategies so that we can improve public health through safer food. As we all know, protecting public health by ensuring safe and wholesome food is not accomplished through just one isolated action, or through just one organization. We all have to work together on this. It takes all the stakeholders. Yes, FSIS and their policies, and government and their policies, but it's also all segments of the food system that are so vitally important to contribute their ideas, and their thoughts, their strategies. For example, it takes industry implementing these appropriate interventions and effectively implementing them so that we can effectively protect public health. We need to look at ourselves as public health stewards, and never rest on our mission to make the food supply even safer. And congratulations, once again, on your appointments to this very important committee, and thank you very much for devoting your time and efforts towards improving food safety. We look forward to the work that you

have before you, or the output of your work before you during the next two years, and again very much appreciate all that you're going to be doing. Thank you very much.

(Applause)

MS. CUTSHALL: Thank you, Dr. Pierson. I can tell the mic is working now. Next we'd like to welcome Dr. Barbara Masters who is our Acting Administrator. She's going to give us some welcoming and opening remarks. Dr. Masters began her career in FSIS in 1989 as a Veterinary Medical Officer near Hot Springs, Arkansas. Since, she has held a variety of posts throughout the agency, both in the field and at Headquarters. Her previous positions include Director of the Slaughter Operations Staff, Branch Chief in Processing Operations, and a Staff Officer in Technology Transfer and Coordination Staff. She also served as an Inspector-in-Charge in a livestock slaughter and processing establishment, and supervised the HACCP hotline for employees in industry at the technical service center in Omaha. Her most recent position was Deputy Assistant Administrator for Field

Operations.

Dr. Masters graduated from Mississippi State University with a Doctorate of Veterinary Medicine degree, and served in a food/animal internship at Kansas State University. She has continued to further her education by taking advanced coursework in biotechnology at Texas A&M University. We would like to welcome this morning Dr. Barbara Masters.

(Applause)

DR. MASTERS: Thank you, Mary Ann. Dr. Pierson we certainly appreciate you being down this morning as well. Certainly on behalf of FSIS I want to welcome all of you for being with us this morning. This is my third meeting with the National Advisory Committee on Meat and Poultry Inspection as the Acting Administrator, and I continue to be encouraged by the dedication that each of you bring when you come to the committee, and when you come to work with us. I look forward to a productive forum. I think we're getting better and better at putting ideas and issues in front of you. You've continued to be enthusiastic and give

us good information. And so we want to keep giving you challenging ideas to work on when we bring you together like this.

I realize more than ever that the challenges that we have confronting us are difficult. And I remain as committed as ever to protecting the public health, and making sound public health policy decisions at the national level. I am very glad to be here at this 2-day meeting, and certainly I'd like to use this opportunity to get to know all of you even better.

I would like to take a chance to welcome our new members to the committee. Unfortunately, only one of them is with us, Mr. Mike Finnegan from the Montana Department of Livestock. Mike, welcome. And we also have two new members that were not able to attend. Dr. Andrea Grondahl with the North Dakota Department of Agriculture, and Dr. Elizabeth Krushinskie from the U.S. Poultry and Egg Association. And we'll look forward to their participation in the future committee meetings. And I congratulate all of you that are back with us as well.

I'm very excited about the possibility of hearing new ideas and recommendations to improve food safety and public health. This committee's ideas and recommendations are vital to our efforts in FSIS to make ourselves successful as a public health regulatory agency. Your suggestions and feedback are critical and have been critical informing what we do. We take all of your suggestions when shaping our policy decisions. To provide you with updates on what FSIS has been doing in regards to issues discussed at previous meetings, we have provided you with briefing papers on recent topics. There's also time on our agenda this morning for committee members to ask FSIS staff members that are somewhere in here on follow-up questions with those briefing papers.

We have a great agenda for the next two days, and I am very, very pleased to say we were able to get those materials out to you once again in advance of the meeting. And I want to congratulate our staff, the Strategic Initiatives Partnership and Outreach Staff, for making that happen. I think we have found without question that allows us to have a

much more productive meeting, to have more time discussing the issues rather than reviewing the information that's in your notebook. And I think we all agree that has provided for a much more productive forum.

I want to briefly mention, as Dr. Pierson did, the issues that we have on our agenda which we are presenting for consideration by three subcommittees. A full description of those is in your notebook, and included with that is the questions that we'll be asking in your packet of materials. The first issue that you'll hear about is how FSIS will want to best share information on new technology with small and very small plants. New technologies have resulted in significant improvements in the safety of meat and poultry in recent years. We certainly desire these kind of advancements, and want them to continue. We recognize that the small and the very small plants often lack the resources that exist in the larger establishments. We have been funding studies through cooperative agreements to identify, develop, and validate new technologies to determine which ones are

economically viable for small and very small plants. We're very hopeful that this will lead to beneficial and efficient new technologies on food safety and public health. What we're going to be looking to you all for is recommendations and guidance in defining the best ways to help us encourage the greater sharing of this new technology with the small and very small plants. So that when we actually get a new and validated technology, how can we ensure the greatest sharing of that technology to the small and very small plants. It does no good for us to get that new technology and have it sitting in Washington. We want to make sure that all of the small and very small plants can take advantage of that new information.

The second issue is providing guidance to industry regarding holding product when FSIS tests for an adulterant. We had brought the issue to this group, whether or not FSIS should not apply the mark of inspection to product that has been tested for an adulterant until the agency receives the results of testing for an adulterant. We did not get a consensus from this group, but what we did get a consensus on

from this group was that we all agree that potentially adulterated product should be kept out of commerce until -- so that we can protect public health. There was a lot of agreement on guidance material that could be provided to the industry. And so what we would like to talk to you about is get your input on how we can most effectively provide guidance material to the industry, and in particular to small and very small plants, and how that guidance material can be most effectively made available to small and very small plants. Because I think we all share the common goal of ensuring that products are not out in the commerce, and how that is best done was the question that was unresolved. And so we'd like to have some discussion about guidance material, and how that can best be made available to small and very small plants.

The third and final issue is conducting effective risk-based sampling of small and very small plants. FSIS is exploring methods to enhance our capability to anticipate public health risk involving meat, poultry, and egg products. We have already developed a risk-based verification testing program

for Listeria monocytogenes, and we expect to implement risk-based sampling for other pathogen programs. To continue on this successful path, we're going to be asking one of our subcommittees for your views on this issue. We are seeking guidance on how to more effectively develop risk-based verification testing programs, and we want you to consider specifically unique considerations associated with small and very small plants.

So I think these three topics will keep you extremely busy throughout today and tomorrow. They're very timely to our agency, and they're ones that we value your input on. And certainly again, encouraged by your dedication that's brought you here today, I look forward to a productive meeting, and we certainly are looking forward to the recommendations. And I thank you in advance for the effort that I know you're going to put in, as I've seen the work that you've done in the past, I've seen the lively discussions that go on in the subcommittees, and I look forward to all the input that I know that we'll receive from you. So again, thank you, and I look

forward to the lively dialogue, and the recommendations. I'm always amazed, I see the subcommittees going and I think what are we going to get tomorrow. And I'm also amazed at how organized and such thoughtful insight that we receive on the second day. So again, thank you in advance for the work I know we're going to receive from you. Thank you.

(Applause)

DR. MASTERS: The next step is, because you basically are a new committee, most of you are renewed committee, we have certificates we'd like to present to you. And this is going to be a challenge, so I'm going to ask Mary to help me, and we're going to come to the center of the circle. The first person we'd like to recognize is Gladys Bayse from Spelman College. Gladys we'll come your way, how's that? It might be easier. Thank you so much. I probably don't even need the microphone at this point.

David Carpenter. There you are. David, thank you. James Denton. Thank you. Darin Detwiler. Darin, thank you for all your time. Kevin Elfering.

Sandra Eskin. Thank you. And Mike Finnegan. Glad to have you join us. Thank you. Mike Govro. Mike. One of our new members who's not with us is Dr. Andrea Grondahl. She's not with us. Joe Harris. Joe, thank you. Those of you on the outside will have to check it out later. Jill Hollingsworth. Thank you. Michael Kowalcyk. Thank you very much. Appreciate it. Beth Krushinskie is not with us today. Irene Leech. Thank you. I heard about that. Catherine Logue. Thank you. Somebody mentioned -- thank you very much. Honoring folks that are here doing their time. Thank you very much. So again, thanks to all of you and the time and dedication. As Dr. Pierson says, we know that you earn a lot for this time.

(Applause)

MS. CUTSHALL: Well thanks to Dr. Masters and Dr. Pierson. And congratulations from myself and all my staff to the new members, and to the returning committee members. I'll echo what Dr. Masters and Dr. Pierson said. We look forward to a very productive session. I know you've all been very helpful to us in the past, and I agree with both Dr. Masters and Dr.

Pierson. We have some very interesting issues, some things that we really would like your insight on. We continually try to come up with issues that are pertinent and relevant to the committee, and to FSIS. So we're looking forward to hearing from you.

I know that you've probably looked at the agenda, and this is usually the part of the agenda that's Robert's Rules of Order. But since I am not Robert, we will become Mary May I. So. That's actually -- Ken Peterson gave me that name as moderator of a number of the BSE workshops. So in lieu of Robert's Rules of Order, we will go over the agenda, and we'll talk about how we're going to do things. The best news is as of lunch time we will have the full room, and we will have plenty of room for everyone to sort of stretch out, and get a little bit more comfortable.

We have a very full agenda over the next two days. I'm going to briefly go over the schedule. First, as Dr. Masters mentioned, we're going to cover updates, and briefing papers from previous issues, and issues that some of the members requested that we

provide you with briefings on. We're going to tackle the issues that were discussed by Dr. Masters and Dr. Pierson, how can FSIS best share information on new technology with small and very small plants. What guidance can be provided to industry to ensure that plants hold product when FSIS tests product for an adulterant. And how can risk-based sampling most effectively be conducted in small and very small plants. We're going to break for lunch around noon. In your briefing books, we've provided you with a list of local restaurants for those of you that are unfamiliar with the area. We also do have the cafeteria that is right here, as well as a deli on the basement floor of this building. Please note that we do have security in this building. I think you experienced it on your way in. We did have escorts to be able to help make sure that you got in and out. Hopefully you will not lose your badges at lunch time, but if you do have to surrender your little stickies, we will make sure that we have folks at the first wing entrance, and the second wing entrance out here to make sure that you're escorted back in after lunch.

This afternoon we're going to complete the issues, and have subcommittee breakout sessions. The subcommittees are going to discuss their issue topics, and obviously provide the full group with a briefing tomorrow morning. Mr. Kevin Elfering is chairing the subcommittee addressing sharing information on new technology with small and very small plants. Mr. Mark Schad is chairing the subcommittee on holding product when FSIS tests for an adulterant. And Mr. Darin Detwiler is chairing the subcommittee on effective risk-based sampling in small plants. The complete standing subcommittee membership lists are in Tab Number 2 of your notebooks.

I did mention that the room will be a little tight this morning, and will open up after lunch. If you have a question or comment during any of the presentations, we ask you to turn your tent card vertically up and I will recognize you and give you an opportunity to speak. Public comment. There will be time for public comment tomorrow after we have discussed the issues. This really is about our interaction with the subcommittee, and the

subcommittee's addressing of the issue. So we would appreciate your help in keeping that rule of order as well.

Just a couple of housekeeping items. The restrooms are located in Wing 2, out through the door here. You know, whenever I moderate, I always feel like the airline stewardess? Two exits on the side, we have lights down here. The restrooms for the ladies are at this end of the hall on the left. Restrooms for the gentlemen are at the far end and will be on your right. I ask that if you have cell phones, Blackberries, pagers, if you would turn them to vibrate, or turn them off for consideration of the rest of the committee, that would be greatly appreciated, especially in such a small space as we have today.

So what we're going to do at this point is open it up to talk about the briefing and past issue papers that we provided you in your notebooks. And I'd like to go through in the order that you found in your table of contents. The first updated issue paper was from the last subcommittee meeting on the

technical service center, and what they can do, and how they can do things better. So if anyone has questions or comments on the update from that particular issue, we'll be glad to entertain those at this point in time. You're starting out awfully quiet this morning. Either the paper was so very well written that you have no questions, or you're all still a little bit sleeping. No questions? Yes, Dr. Harris.

DR. HARRIS: As I recall, one of the recommendations, or one of the discussions at our previous meeting on this topic was the hosting of workshops or technical workshops by the Tech center. Is anything in the works on that?

MS. CUTSHALL: Lynvel? We have Lynvel Johnson, the Director of the Tech Service Center here with us to help answer questions for you.

MR. JOHNSON: Yes, that's still something that we can honor. We certainly at the Tech Center not only go out to the districts, do correlation with the district personnel, but we also do presentations for -- if industry or states need the Tech Center to

come out and correlate on topics. We do do that too. So that certainly is an option that's always open, and always has been since we've been the Tech Center.

MS. CUTSHALL: Thank you, Lynvel. The next was the training and outreach issue that was presented at the last meeting. And since I presented that issue paper, I will be glad to entertain your questions regarding that. Mr. Govro?

MR. GOVRO: Yes, Mike Govro, Oregon Department of Agriculture. In the paper here under the second bullet it mentions an interactive, narrated CD-ROM that you use for training. And I wondered if that is available to someone such as myself outside the agency.

MS. CUTSHALL: Absolutely. In fact, all the CD materials that we have been providing we have been trying to make available to state directors, as well as doing mass mailings to all the plants. So if you haven't received them, just let my office know and we'll be glad to get them to you.

We're also in the process right now of developing some interactive modules for Office of

Field Operations that are going to be used by their personnel between our office, SIPO and CFL has been coordinating on this. And some of the different topics are sort of the structure of FSIS, how we work, giving good and effective presentations. And we're also working on one right now for Bill Smith that talks about the acts, and how the acts impact inspectors' work on a day-to-day basis. If you're interested in obtaining those once we get those out there, we'd also be glad to supply those to you. And I think they -- particularly for the state folks they'll serve as a nice little training tool because they're short, 15 to 20 minutes, they're interactive, you can have your front-line supervisors work with their folks in a work unit meeting, or if you've got some down time, and it's very easy to use. You can also just hand out the CD. So just let my office know and we'll be glad to provide them to you.

Dr. Bayse?

DR. BAYSE: Yes. I just wanted to complement you on all that you have done since our last meeting. And just say thank you from the

committee. Great write-up.

MS. CUTSHALL: Thank you very much. We always appreciate a complement. And I'd like to thank all the people from all the other program area staffs that worked hard to put the briefing papers together, that worked hard to put the presentations that you're going to hear today as well. So I'd like to spread the wealth of thanks around to everyone who participated. Mr. Kowalcyk?

MR. KOWALCYK: Yes. Mike Kowalcyk from Safe Tables Our Priority. On the second page of this document you discuss the food security workshops, and in the constituent updates there's always been information about that. And I was just wondering what type of feedback the agency has gotten mainly from industry as to what industry is getting out of these workshops so that they can better secure their plants while not taking away from their main job is to produce food in the most efficient and safest manner possible. I was just wondering what type of feedback you've gotten from industry?

MS. CUTSHALL: Good question. That's a

good question, and actually it's a very timely question because we're still in the process of conducting the last couple of workshops. We have two webcasts that are coming up that are going to be webcast from here in Washington on Saturday the 25th and Monday the 27th. So if there's anyone in the room who's interested in registering for the webcast, certainly just go onto our webpage, and sign up, and we'd be glad to have you participate. The final face-to-face workshop will also be webcast, and that's going to be in Philadelphia on July 9.

We have been looking and doing some analysis of the feedback that we have received on the evaluations from the food security workshops. Generally they're being well received. We do have, I think, some of the same concerns that you're expressing. We're trying to get industry to understand that it is an important part of what they're doing, and that there are oftentimes overlaps between food safety and food security. Those two issues are not mutually exclusive.

We have been talking to industry, and I

think when we were out in Oakland, Dr. Masters was there as well, and one of the points that she made is that we're strongly encouraging industry to voluntarily look at developing food security plans. Because if we have a significant response, then we would not need to proceed with rulemaking. I believe that Mr. Derfler has put food security regulation on the agenda for OMB, but we have not proceeded with taking any further action. Industry generally is supportive. Industry generally is supportive. I think one of the most interesting comments that we got was from Ms. Rosemary Mucklow out in Oakland as well who really encouraged her membership to sort of get on the ball, and start doing this before it was too late. She sort of gave the rousing battle cry to the industry that they need to be ahead of curve rather than wait to be behind. Because if something happens with a food security issue in the same way as it would happen with a food safety issue, it's better to address it up front than to wait till something really tragic occurs. So. And once we get the full evaluations we'll be making that available on our

website as well. So we'll make that available to you. Dr. Carpenter?

DR. CARPENTER: Yes, David Carpenter of Southern Illinois University. You mentioned the creation of the Internal Communications Board this summer of focus groups. Will the focus groups include all of USDA, or just FSIS, and will there be people from outside on those focus groups?

MS. CUTSHALL: The Internal Communications Board, and I can ask Mr. Quick to speak on this for a minute if he would like to, is about internal FSIS communications. So the focus groups that will be taking place this summer will be our employees. We certainly are looking to get input from our outside constituents. One of the things that we've been doing with the workshops and the webcast is that we have put together an additional evaluation form where we'll looking at overall communications issues with our outside constituents, both industry, academia, and others. Another tool that we're trying to use is we've got OMB approval on our website to ask a certain number of questions in a certain format. And we're

going to be putting some questions regarding communications and how we can more effectively communicate up on the website as well. But the actual Internal Communications Board is just for FSIS, and looking at how we can internally communicate with one another more effectively.

MS. CUTSHALL: Do you have anything to add?

MR. QUICK: You captured it pretty well. It's essentially we have two avenues of internal and external communications among many program areas as well as with the Headquarters staff and the rest of the staff in the states. It's going very well, and we plan to have them wrapped up by Halloween. We've gotten a lot of good feedback from our first meeting with the NICP in Baltimore a couple of months ago. We're very optimistic. The internet/intranet are a big part of that as well as a communication tool to our employees. For improving public health through the scheduling of communications.

MS. CUTSHALL: As well as our mantra that is on our new lanyards which we gave out to you,

?Improving public health through food safety and security.? Any other questions on training and outreach? Mr. Schad?

MR. SCHAD: Mark Schad, Schad Meats, and this is more of a comment than a question. And it's just kind of backing up what you said already, Mary. Just speaking for the very small industry on food security, we do want to keep it on a voluntary basis, and we think not only because we want to avoid regulations. It's because we think it's best for all the constituent groups involved that it be voluntary. Because I think we made comments either at the last meeting, or maybe the meeting before that one, that this keeps information out of the hands of the so-called bad guys they might get through the Freedom of Information Act. So, like I said, speaking for the very small processors and the trade association I'm involved with, we are pushing to keep our members and very small processors to do this voluntarily.

MS. CUTSHALL: Okay. Mr. Govro?

MR. GOVRO: Yes, one more question. Not exactly related to the briefing paper, but you had

mentioned several times food safety and security. And last week at the Association of Food and Drug Officials conference we had a discussion about the use of the term ?food safety?. And apparently prior to 9/11 the term ?food safety? was used by advocates of ending hunger as a term they've used for people having enough food. And the ?food security? as we know it sort of co-opted the term. Last week there was an emphasis in changing that term to ?food defense?. And I wondered if the agency is going to move in that direction.

DR. MASTERS: Thank you for that question, Mike. This is Barb Masters. And actually the agency has submitted a request to change the name of our food security staff to reflect that change, and it's at the departmental level for approval.

MS. CUTSHALL: Any other questions on this particular update on an issue? Okay. The next one is data acquisition to anticipate food-borne hazards. I think this has been an issue at the last couple of meetings. We've talked about it as the data depository, and under a number of other terms. We

have, I believe, Nelson Clinch here with is that is going to answer any questions that you might have on the progress that we have made regarding the data sharing issue. Yes, Mr. Link.

MR. LINK: Now, let me -- attend the FDA meeting where I guess I just gave a briefing on what they wrote for the act. And reading through this briefing update, there's a couple of examples, think in beef, to look at some indicators where this is talking about ground beef and salmonella. I'd just be interested in hearing a little more. I guess maybe we'll discuss it at FDA.

MR. QUICK: On what's being discussed with FDA? Did I understand that question correctly?

MR. LINK: And food processors.

MR. QUICK: Okay. Thanks for clarifying that for me. Unfortunately I wasn't able to attend that one either. I think Sean Alterkruse was planning to be here to answer questions, and he wasn't able to make it today, so I may have to ask if any of my other colleagues have answers to some of these questions. But I don't have any additional information, really,

from what is in that bullet, other than.

DR. MASTERS: We can get a copy of Dr. Alterkruse's presentation and provide a copy of that presentation.

MR. QUICK: Okay.

MR. LINK: Are you actually sharing data now with the industry, a file program, and if so how is that going?

MR. QUICK: We're working toward getting it established. There's a team involved in that. I'm -- as I said, Dan, are you able to answer that further? Is there any further information I can share?

DR. ENGELJOHN: This is Dan Engeljohn. We have a couple of situations in which clients have come forward and are beginning to dialogue of how they in fact have information that may benefit the agency in its quest to be able to anticipate situations that might lead to non-compliance ultimately in producing food and some of the indicators that we're using. And so we really are in just the mode of talking with individual plants who want to share information, and

we're looking at the pilots in this sense, and we would be more than happy to work directly with the establishments. So we don't have any formal processes in place at the moment.

DR. MASTERS: Mr. Elfering?

MR. ELFERING: Kevin Elfering, Minnesota Department of Agriculture. One question is are the salmonella samples that you're taking for salmonella performance standards, are they molecular subtype?

MR. QUICK: Molecular?

MR. ELFERING: Or PFGE, pulsed-field gel electrophoresis.

MR. QUICK: I don't believe that we're doing the PFGE testing on those. I mean, we're doing the typing, and the -- serotyping.

MR. ELFERING: Serotyping, but no PFGE?

MR. QUICK: Not that I'm aware of.

MR. ELFERING: Is there any thought of doing that in the future at all? And one of the reasons I bring it up is we use PFGE a lot in trying to identify food-borne illness outbreak, and it's been really beneficial. We put together a database of all

of our positive samples, whether it be Listeria, salmonella, in doing the molecular subtyping. And then that way, if we have illness cases in the future, we can even hopefully link it back to that particular product.

MR. QUICK: Again, I'm not aware. I don't know if Dan has further information, or if one of my other FSIS colleagues has any information of any plans to do that. I'm not aware of anything myself.

MS. RANSOM: I do have some information on the species of salmonella backup isolates. A lot of those are going to follow up or the antibiotic that is resistance testing, and some of those are also PFGE tested. But I'm not sure if all of them are.

MR. ELFERING: Then as a follow-up question, are those being provided to state health departments? Are they being posted on POLSA or anything like that?

MS. RANSOM: I believe that they're getting PFGE and they've linked over onto POLSA.

MS. CUTSHALL: Do we have any additional questions on this particular issue? Okay. The next

is the twice yearly update on the National Advisory Committee on Microbiological Criteria for Foods. We have Ms. Ransom.

MS. RANSOM: Okay. Good morning. I'll give you a brief update on your sister advisory committee the National Advisory Committee on Microbiological Criteria for Foods, or NACMCF. I do have a slight change from what you got as a list of our projects. There was a project there on molluscan shellfish. We're going to hold that project until we can give the Interstate Shellfish Commission a chance to meet so we can incorporate the newest information into that project. That's going to be replaced right now with a project, consumer guidelines for safe cooking of poultry products. So that will be one project NACMCF will work on. Then we're going to keep the determination of cooking parameters for safe seafood for consumers, and also we'll be working on the analytical utility of Campylobacter methodology.

And I also do have a date now for our upcoming meetings. We will be meeting in Washington, D.C., July 12 through 15. And Dr. Elfering, you have

a question?

MR. ELFERING: Yes, Kevin Elfering, Department of Ag in Minnesota. This safe cooking of poultry, is that going to include some of these products that give the appearance of being cooked that are only partially cooked? Do you look at even changing some of the cooking instructions on the labeling?

MS. RANSOM: Okay. Yes, I believe that will cover some of those products. A variety of poultry products will be covered, including those that are whole-muscle products, with and without added ground emulsified tissue, ground poultry, bone-in product as well as raw products with heat-set breading.

And the chair of our committee will be Dr. Dan Engeljohn, so he's going to make sure that we're concentrating on all the important products. One thing we want to focus on on that project also is to incorporate the new food-borne outbreak information into that project.

MR. ELFERING: That's terrific, because

especially on these products that give the appearance of being cooked that are raw. We have had some food-borne illness outbreaks associated with them. So I'm very happy that you're going to be looking at them.

MS. RANSOM: Okay. Particularly Heidelberg was one thing that got that project on the radar screen, and we want to make sure we are looking at the disease information.

DR. MASTERS: Dr. Carpenter?

DR. CARPENTER: Yes, David Carpenter, Southern Illinois University. I guess I'm asking questions out of ignorance. There's 30 members of this committee. Why are 25 percent of them government employees, or from government agencies, when the objective of the committee is to give advice to federal agencies? Why are there more than one representative from any particular, like there's three from CFSAN. It's not like the composition of this committee.

MS. RANSOM: Well, as Dr. Pierson mentioned, we do have a balance built into the committee. Basically we do try to get an equal number

of academia, government, and also industry on that committee. So it should be about balanced.

DR. CARPENTER: Do you ever consider members from the American Society for Microbiology? I mean, they're the ones who usually develop methodologies in micro, or in association with public health laboratories.

MS. RANSOM: Many of our members are at least members of the American Society for Microbiology. We do have some state public health folks on the committee this time. There's someone there from the New York Department of Health. So. And it depends on who applies, also.

DR. CARPENTER: Just to clarify, I think the mission is to give advice to participating federal agencies, but about 25 percent of the members are federal agencies. I mean, is there a conflict there, or is that a necessity?

MS. RANSOM: Okay, one reason why we do have the federal members on the committee is so that we can steer the projects at least to get what the federal agency expects out -- you know, what is

covered. Many times we have the chair of the committee, someone from that federal agency, to make sure that what we are asking for is worked on.

DR. CARPENTER: Okay. Thank you.

MS. CUTSHALL: Dr. Logue?

DR. LOGUE: Hi, Catherine Logue, North Dakota State. Just some questions regarding the methodologies for the Campylobacter. What do you do intend to do here? Do you intend to standardize the measures that can be used by FSIS? And using current knowledge and research from academia, and what's out there already. And then how far do you propose to take it? Do you want to take it all the way to molecular level or not?

MS. RANSOM: Okay. We would like NACMCF to focus on the methodologies to be able to suggest to us what might be best for us to use for a baseline study. There are a lot of new methods coming out, and perhaps for subtyping and epidemiology we will need to go to molecular methods. So we do want NACMCF to give a thorough look at what's out there. We know that we're woefully outdated in our methods now, and we

need to work on that, which is why we wanted NACMCF to do a Campylobacter project.

DR. LOGUE: One other question. Are you going to focus on just Campylobacter jejuni or are you going to look at more of the other species as well?

MS. RANSOM: Okay. We hope that's something that NACMCF will give us some insight into.

MS. CUTSHALL: Mr. Govro?

MR. GOVRO: Thank you. Mike Govro, Oregon Department of Agriculture. Could you please expound on the safe seafood cooking parameters and what the committee will be looking at specifically there?

MS. RANSOM: Okay. That charge originates from FDA, and they are working to write it up right now, so I don't have all the particulars. But I know an initial concern that started us thinking about that project was that there's not a lot of uniformity in the way seafood is cooked. And if we can look at what we know will be safe, and ways to validate cooking methods, and come up with something uniform. And I hope to see that charge written out soon, but as I say, they're still working on it.

MS. CUTSHALL: Dr. Hollingsworth?

DR. HOLLINGSWORTH: Thank you, Jill Hollingsworth, Food Marketing Institute. In following up on Catherine's question on Campylobacter, is there a common or uniform methodology that's currently being used by both FSIS and CDC for the isolates collected from poultry products, but then also the human isolates?

MS. RANSOM: Okay. I don't believe there is something common being used between CDC and FSIS right now. As I said, we know at this point we need our method updated, and there are a lot of new methods out there. I know that the European group Campynet has just recently at this past ASM meeting, the American Society for Microbiology, did report on a method that may be quite a good one. So I'm hoping NACMCF will look at that.

DR. HOLLINGSWORTH: The reason I mentioned it, just CDC is also testing both products and human isolates of Campylobacter, and were concerned that there may not be consistency in the work CDC is doing on poultry products testing, and FSIS may end up with

various results that can't be compared. And that might be a suggestion, something that I think FSIS should try to coordinate with CDC if they're doing products in addition to human isolates.

MS. RANSOM: That would be a good thing to make sure the focus gets into this NACMCF charge. I'll keep that in mind.

MS. CUTSHALL: Do you have any further questions on that issue? Mr. Elfering?

MR. ELFERING: Just as a follow-up to Mike's question. On the seafood cooking, is that for microbiological, or also parasites?

MS. RANSOM: Okay. It would be food safety in general, so I would hope that it would occur the parasites as well. Thank you.

MS. CUTSHALL: Thank you, Ms. Ransom. The next briefing paper was on BSE. Do we have any questions regarding BSE? I see a lot of interesting looks on the committee members' faces. I don't know what lies in store for us behind those smiles. Mr. Elfering?

MR. ELFERING: Kevin Elfering, Minnesota

Department of Ag. I won't ask about the results that are pending, that are being done. Has there been any further discussion at all on allowing the slaughter of non-ambulatory livestock in custom exempt processing plants?

MS. CUTSHALL: Okay, we have Dr. Don Edwards with us this morning to talk to you on your issues regarding BSE. Barb, did you?

DR. MASTERS: I'll give the broader update on that, For specifics I'll let Don Edwards get into the specifics, but I'll give the broader update on where we're at on all of our policies related to BSE and the interim final rules. I can give you scoop on all of our interim final rules.

FSIS is at the point that we would not finalize our interim final rules related to the non-ambulatory disabled animals, specified risk materials, advanced meat recovery. We will wait on analyzing all of the 22,000 comments that we received. We will wait on the completion of the enhanced APHIS surveillance, as well as we have been working with Harvard. They're doing an updated risk assessment for us to

specifically look at our interim final rules. Those three pieces of information is what the agency will use to issue our final regulations. We are confident in the safety of the food supply with the interim final rules in place, as well as the feed ban by FDA, as well as by the enhanced surveillance program going on. We believe those firewalls is what's protecting the food supply today. But we will rely on the completion of the enhanced surveillance program as a data piece, the risk assessment as a data piece, and our 22,000 comments as a data piece, to finalize our interim final rules.

MS. CUTSHALL: Dr. Logue?

DR. LOGUE: Just a quick question. I was at ASM last weekend. Dr. Stanley Cryz talked about some new method that he has that's supposed to be a little bit more sensitive than the IHC. And I know this was also mentioned, I gather, at a press conference recently as well. Is the FSIS going to take a look at this, and look at the sensitivity of it? Because it's supposed to be a little bit more sensitive.

DR. MASTERS: This is Barb Masters. Again, it is APHIS, our sister agency, that does the confirmatory tests on the animals that are tested for BSE. And so certainly, based on the press conference Friday night, our sister agency is looking at their testing methodology that they committed to to determine their final policy decisions for their confirmation tests. So those policies are under consideration by the department.

MS. CUTSHALL: Dr. Harris?

DR. HARRIS: This is Joe Harris, and I wanted to ask a question. Last week FSIS extended their notices pertaining to sample collection and everything, and there was a little bit of confusion out there as to whether or not -- because the notices that pertained to the interim final rules and the collection of samples, and ante-mortem condemns and all of that, was extended to June of '06 I believe. And there was some confusion out there, and some question as to whether or not that meant the enhanced surveillance program was going to continue. And I understand that's an APHIS program, but the FSIS

notice is being renewed. I just kind of wanted to clarify if that is an indication that that surveillance program is going to be ?.

DR. MASTERS: We issue our FSIS notices on an annual basis. So those notices were issued for that year's period of time. The APHIS surveillance program was indicated that it would be done for 12 - 18 months, with their goal to get as many high risk animals as they could. They have obviously reached that number of animals they had hoped to reach, but they had always indicated the 12 - 18 month period of time. So they are looking at where they've reached those animals, have they gotten all the types of animals. So they are looking at that. And so there's no indication at what point they will finalize that program. So we needed to have our notices in place until they could complete that program. And so we just issued them for the year. When APHIS does complete their program then we are in a position that we can put out new notices to match what their new program would be. So we just issued them on an annual basis, recognizing that when they put their new

program in place we can put out new notices.

MS. CUTSHALL: Do you have any additional questions?

MR. EDWARDS: I do have one thing here. I have a comparison between the two tests. So I'm going to supply them to Mary.

MS. CUTSHALL: Thank you. We can make copies, and we'll make sure you get copies before you leave tomorrow. Okay. The next updated topic was an issue that came before the committee a number of times and a number of different iterations over the years. And that is state reviews, and reviews of state programs. Do we have any questions? Dr. Hollingsworth.

DR. HOLLINGSWORTH: This may be too off the subject to cover here, but I was wondering if since it had the word ?state? in it, if I could ask for any update on the issue of interstate, intrastate shipment of meats.

DR. ROTH: At this point in time --

MS. CUTSHALL: Jane, could you introduce yourself, please?

MR. EDWARDS: Jane Roth, FSIS. At this point in time we have nothing to update related to interstate shipment.

MS. CUTSHALL: Do we have any other questions regarding this particular update on an issue? Mr. Finnegan.

MR. FINNEGAN: Yes, Mike Finnegan from Montana. When they plan on doing a review, how much notice are the states getting? You know, just picked out as notifications, recommending, things like that?

MR. EDWARDS: We give the states 60 days notice.

MS. CUTSHALL: Any other questions regarding this particular updated issue? Okay. The next update is similar to the NACMCF update that we do every time we have one of these meetings. And it's the legislative update for 2005-2006. And we have Mr. Bryce Quick with us to answer any questions that you might have regarding that particular briefing. Mr. Link?

MR. LINK: Charles Link, Cargill. Reading through the briefing paper, and the very last

statements, or real close. Registration was scheduled to vote on June 6. I'm just curious if that happened, what the outcome was?

MR. QUICK: You know, the appropriations bills all start in the House. The House actually takes place there, and they wait for the Senate to act on their side, and the subcommittee, and then it will go the 23rd before the full Senate Appropriations Committee.

MS. CUTSHALL: Can everyone hear Mr. Quick?

MR. QUICK: Actually, the Congress is working at record time. Knock on wood, provided any unforeseen events taking place up there, we may have a record time spent. The 23rd is what the Senate has issued. So just to keep you updated. The Senate tends to be a little more moderate in the cuts that they take, and we're hoping on particularly on the Food Defense Initiative that that will approve.

MS. CUTSHALL: Okay. Mr. Schad?

MR. SCHAD: Mark Schad, Schad Meats. Under the part where it says Fiscal Year 2006 request,

I see the words ?propose new user fees?. I wonder if we could get an explanation on that.

MR. QUICK: I'm sorry. Could you say that again?

MR. SCHAD: ?Propose new user fees?

MR. QUICK: Right, the $139 million?

MR. SCHAD: Yes.

MR. QUICK: This is something that as most of you that have been around for awhile, it's probably the second decade that we're going through either of these prospective -- As far as we know, there is a lot of support, as usual. The Administration did propose another $139 million in new user fees. This year they packaged it a little differently. They sent it up with the other agencies' user fees. It's a constant struggle between the Legislative Branch and the Executive Branch on this particular issue, because of course we did not provide spending cuts for them, and that's kind of a bone of contention. But we don't anticipate a lot of support for that this year.

MR. SCHAD: Is that something the agency is supporting?

MR. QUICK: The Administration supports that, so I would say yes, the agency would support that, because we're part of that branch.

(Laughter)

MS. CUTSHALL: Thank you, Mr. Quick. Dr. Harris?

DR. HARRIS: One of the amendments that was added late in the process dealt with prohibiting the department from spending funds to provide -- horse plants. Coming from a state that has two of the three existing facilities, how will the -- assuming that doesn't get changed by either the Senate or in conference, how would the agency deal with those plants, and would they still be eligible for voluntary if they paid for it?

MR. QUICK: This is about the third time this has come up. And this time it passed in the House by 269 votes, which is a very, very steep climb for those that are opposing this amendment. We at the department are still looking into what we would have to do in the event that the Senate does pass it and the conference approves it. There are a number of

things that we're looking into. One of the things would be either voluntary inspection. There are all sorts of legal hurdles that our Office of General Counsel will have to consider. It really is premature. We've got to see what the final outcome is before we even really say definitively what actions the department or the agency would have to take. But we are monitoring it very, very closely.

MS. CUTSHALL: Ms. Eskin?

MS. ESKIN: In addition to obviously the appropriations bills, are you all tracking other legislation that would have an impact on food safety, particularly inspection, like S-729. Do you all -- That's Durbin's bill, the Safe Food Act. It was introduced in April, and it does the Administration have an official position?

MR. QUICK: As far as I know the Administration hasn't taken an official position on that bill. We track those very, very closely. At this time there hasn't been a lot of activity.

MS. ESKIN: Right.

MR. QUICK: Most of the activity is around

the -- process. We're anticipating that there will be some debate on that. But I have no idea if the Administration will take a position. The bills are out there.

MS. ESKIN: Right.

MS. CUTSHALL: Mr. Elfering?

MR. ELFERING: Kevin Elfering, Minnesota Department of Ag. This may have a little bit to do with budget, but the issue with the horses, has there been any discussion at all on including other species as amenable to the meat inspection act, such as bison, that they would be mandatory as far as inspection?

MR. QUICK: I can tell you the Legislative -- at least in this session obviously that has come up. I think in the past that issue has come up in committee, but it hasn't really gone very far.

MS. CUTSHALL: Mr. Kowalcyk, and Mr. Quick, if you could stand up so we could all hear you, please?

MR. KOWALCYK: Michael Kowalcyk, Safe Tables Our Priority. On the last page you talk about the $2 million for outsourcing of microbiological

testing. And that was tentatively scheduled for a House vote earlier this month. Can you provide a update as to the outcome of that? Was it voted on, what was the result?

MR. QUICK: That did not pass the House. That was a part of our base funding. The $2 million from last year was continued to this year, and into the foreseeable future. Those baselines are there. I know that no progress has been made on the outsourcing of the micro testing. Lauren Lane did get some data on that.

MS. CUTSHALL: Ms. Eskin?

MS. ESKIN: Sorry. False start.

MS. CUTSHALL: Do we have any other questions on the legislative update? The next briefing paper was on the government accountability office report. It was requested by one of the members on your committee. We apologize for it coming a day or so later than the rest of your briefing books, but we didn't find out about the need to address the issue until we had actually sent your briefing books. So hopefully you all did receive that in advance of the

meeting and had a chance to take a look at that. Dr. Hollingsworth?

DR. HOLLINGSWORTH: Yes. On the first item, the dual jurisdiction response and FSIS, I wasn't sure that I actually understood that because it kind of surprised me. I was under the impression that in addition to warehouses, because that's a part of facilities that would come under dual jurisdiction. Any processing plant's that making both cheese and meat pieces, and making soup, a canning operation that's doing non-meat and meat chili. It just seemed to be frozen food, entrees, pot pies. I guess I was under the impression it was quite a few of those. I didn't know if you were making a distinction between continuous inspection versus daily inspection. But it did seem to me that there are a lot of facilities that make non-meat and poultry products where there are USDA inspectors present on a daily basis, and in that regard it seemed to me that the GAO recommendation in fact may already be in place, and it is being met, because the FSIS inspectors are there everyday, and they are doing general sanitation, and facility

checks, and what have you, that would cover the jurisdiction of both products. Can you clarify that to me? Because it sounds here like it was just focusing in on warehouses as opposed to processing facilities that make both meat and non-meat products.

MS. CUTSHALL: Dr. Roth?

DR. ROTH: Jane Roth again from FSIS. I think what you just said Jill is correct. That would actually not -- it is a little bit misleading. We do talk about the warehouses, but in fact we're talking about 1,300 or so establishments. And the warehouses make up about 100 or 130 of the 1,300. And you are correct, that we are doing everything that we can in those establishments where we do have product.

DR. HOLLINGSWORTH: So then I'm not sure I understand. On the comment when you said there would be no economy it seems to me that if in FSIS is looking at those facilities, and if they find deficiencies to provide that information to FDA, those economies are already being made.

DR. ROTH: They are. They are. And I think the point -- FSIS's response to this GAO report

overall is that FSIS is working very closely with FDA, and that we're doing as much as we can. And we believe that GAO misrepresented the number of establishments, and the number of areas. They over-stated their position.

DR. HOLLINGSWORTH: Okay. Well, my only comment then is it seems to me FSIS isn't giving itself enough credit here. There's a lot of dual jurisdiction, and in fact you are already -- have a presence there.

DR. ROTH: You are correct.

MR. QUICK: But in the overall, what we're trying to say to GAO is that it was a very small part of the percentage of what we do in our overall inspection activities. We thought that FDA shared this view because they made it sound like it was a lot bigger than it was.

MS. CUTSHALL: For the record, that was Mr. Bryce Quick. Do we have any other questions on the GAO report? Mr. Govro?

MR. GOVRO: Mike Govro, Oregon Department of Agriculture. I do have another question. It's not

related to any of the bullets that are represented here in the GAO, but this may be the closest subject where I could pose a question. Shall I pose it now?

MS. CUTSHALL: Go ahead.

MR. GOVRO: Okay. It's on a topic that the committee has dealt with before, or been briefed on before, and that's the consumer complaint monitoring system. And I was just wondering if there's anyone in the room that could give an update on that. I heard rumblings at AFTA last week that there may be some intergovernmental wrangling going on over how to proceed with that, some differences of opinion between USDA and FDA. And I was just curious if you could talk about that.

MS. CUTSHALL: I don't know that we have someone present in the room that specifically address that for you, but what we can do is put together a short briefing paper for you, and get it out to the committee, if that would satisfy your needs. Okay. Any further question? Kevin Elfering?

MR. ELFERING: Kevin Elfering, Minnesota Department of Ag. I guess I'm going to disagree a

little bit with Dr. Roth on the collaboration and cooperation between the agencies. And I'm going to say though that it's not from the USDA side. Actually we've been finding that USDA, at least in our district, has been working a lot closer with state agencies and federal agencies, but I don't think we're getting the same collaboration and cooperation from the Food and Drug Administration, at least in the Minneapolis district. I think that we've got a long way to go on collaboration. I think that people have been talking about working together on some of these issues, and I don't see a lot of advancement in really trying to eliminate duplication of efforts. There's times when we have multiple agencies going into the same facility within weeks of each other. You have people that are going in and doing compliance checks. You have inspectors. You have state agencies. The Food and Drug Administration. It's really embarrassing sometimes to see how we don't cooperate and collaborate on food safety issues.

MS. CUTSHALL: Any other questions? Yes, Mr. Kowalcyk.

MR. KOWALCYK: Michael Kowalcyk from Safe Tables Our Priority. I guess to follow up with Mr. Elfering's comments. In reading the GAO report, it seems like there's several opportunities for FSIS as well as FDA to communicate with each other about some of these issues that the report raises. With that said, has FDA or FSIS taken any initiatives or steps to address some of the issues that were brought to light in the report, and if so, what are the plans for the future as to how the agencies would address any of those issues?

MS. CUTSHALL: Dr. Roth?

DR. ROTH: Overall I would say that the agency has addressed all of the issues in the GAO report. And in fact, we've either taken exception to some of that and explained that we've already taken steps to move forward and collaborate. In other instances, we have moved forward on them. I think we acknowledged that cooperation between FDA and FSIS is far from perfect. And I think the ultimate goal is to be sure that we have the safest food and we continue to reduce food-borne illness. So keeping those

objectives in mind, we are making steps forward to get rid of inefficiencies and improve effectiveness. I mean, we are doing this. And so it might not be as fast as we would like, or you know, you would like, but there are teamwork steps. And I think we're about to -- we're just seeing that.

MS. CUTSHALL: Dr. Hollingsworth?

DR. HOLLINGSWORTH: On the issue of the joint collaboration on training, I'm wondering, I understand why there are some differences even just in the authorities given to the different agencies on safety inspection. But I was curious about where the USDA and FDA are in joint training for security?

MS. CUTSHALL: Do you want me to answer part of that?

DR. ROTH: Yes.

MS. CUTSHALL: At least as far as food security, I know we had food defense. I was going to mention that. We had that discussion earlier. There is a joint effort that is going on now between AMS, FDA, FSIS, for state and local regulators, as well as their own folks. They have been going around the

country doing a number of joint training sessions. Suzanne Rigby, Lou Borghi from the FSIS staff have been participating quite heavily in that. And if you'd like more information on where and when those are occurring, you could certainly get in touch with Suzanne and she can give you more information. But I think that's one initial effort that has been very successful as far as joint training on food security. I believe at each one of the workshops and training sessions they've held, they hold them for a maximum of 150 and they have packed the room every single time.

DR. HOLLINGSWORTH: But just for clarification, the security or defense training that you have available on webcast and around the country has been just for meat, poultry, and FSIS, correct?

MS. CUTSHALL: Correct. And what we're doing in the workshops and the workshop webcast is really focusing industry's attention on being able to develop a food safety or food defense plan. It's using the tools that our office has put together, the self-assessment awareness checklist, as well as the models, and some of our notices to our FSIS personnel,

and looking at those, and explaining to industry how they can effectively address food defense in their particular plant from their perspective. And so we're trying to raise people's awareness not only of the tools that are out there, but encourage them and give them information on actually starting to develop their plants, if they haven't done that already.

Are there any further questions on this? Mr. Finnegan.

MR. FINNEGAN: Yes. Mike Finnegan from Montana. Montana has -- they have considered buffalo as an alternative livestock. And one of our big problems with dual jurisdiction is the buffalo inspection, then the FDA will come to the same plant for inspection of processing, slaughtering buffalo. Is there any hope to alleviate that at all?

MS. CUTSHALL: Dr. Roth?

DR. ROTH: I don't have -- I'm sorry. Jane Roth. At this point in time I couldn't give you any specifics, but I'll look into it and get back.

MR. FINNEGAN: See, I don't know if it's unique to Montana, but they're considered an

alternative livestock, so we do charge overtime for processing and slaughter of buffalo in the same plants. They're under full inspection.

DR. ROTH: Okay. We'll take it under advisement.

MS. CUTSHALL: Do we have any further questions regarding the GAO report? Okay. We're going to address the final briefing paper that was requested, which was an update on FoodNet. Mr. Link.

MR. LINK: Charles Link, Cargill. It's encouraging to look at the data and see all the decreases in food-borne illness and we want to repeat that. You know, when you look at it, the salmonella numbers are not down as much as some of the others. And that's unfortunate. But I'm curious if when they're tracking these illnesses, is there a distinction between meat/poultry-related illness and other illnesses?

MS. CUTSHALL: Introduce yourself.

DR. VARGHESE: This is Dr. Reuben Varghese from the Office of Public Health and Science. The way the FoodNet data across the department is handled it's

aggregated and there has not been a complete data distinction between -- It's a potential possibility that the data is all related to food because we're trying to collect all salmonella and E. coli and so on. So we believe the majority is probably food-borne related, and we'll continue to see the decreases that we're seeing in all categories. But we know that there are areas, salmonella is one, in which there are not decreases. So we're looking to see how that continues over time.

MS. CUTSHALL: Are there other questions on this particular briefing paper? Yes, Dr. Carpenter.

DR. CARPENTER: David Carpenter from Illinois. Could you just elaborate, how do these data drive your policy, or changes in policy, or operations? Or do they at all?

MS. CUTSHALL: Would you like to step up to the microphone?

DR. VARGHESE: Well, I think what I would say is that we -- what FoodNet does emphasizes partnering with the FDA, CDC, at that stage. This

data is used to help look at the food-borne disease trends over time. And annually the CDC is in charge of doing that. It's formally -- to present the data for its release. So we are aware of what the trends are. As far as FoodNet it is how policy is made. I refer to the word ?policy? meaning more specifically how it's used. But it is used more now to see if there's been a change in information. And it helps to inform policy-makers as to what we have to do, and it does encourage us.

MS. CUTSHALL: Dr. Engeljohn?

DR. ENGELJOHN: Yes. I've been able to evaluate the policy on Listeria monocytogenes. And I would say that we didn't look at today to see if in fact there are policy implications in which we can change how we do our day-to-day business, whether that be how we conduct our inspections, or whether or not we would be able to target our resources to maybe focus on a particular pathogen, or a particular species that may contribute to food-borne disease. I think the issues that were raised in this afternoon respects verification in the safety program, to get at

the issue of how can the agency in fact target its resources to best impact the public health. The focus this afternoon on the issue would be for the small plants in particular because of the unique circumstances. But we do look at what we do, because then you can see too in public health trends and public health.

DR. MASTERS: I want to comment on that briefly. This is Barb Masters. And from where I'm sitting as Acting Administrator, we're really trying to get the agency as a whole working interdependently using a public health model to drive what our workforce is doing. And certainly we have risk assessment that we're trying to do. We have policy development that we're doing based on this risk assessment, and then we have our folks in the field that are doing that assurance work for us. I have an audit staff that's trying to help me make sure that my folks out in the field are doing what I've asked them to do. We put management controls over all of the top of that to make sure folks are doing what we've asked them to do. And again, we're auditing against those

management controls. But at the end of the day, I have to have some assurance that all of that is having some impact on public health. So this is what I have today. But certainly we're putting some pressure on CDC to get some attribution data for us, because that would be the ideal, if I could have attribution data. So what I can do is put pressure on CDC.

But this too is some indicator that we're having some impact on public health. If at the end of the day all of these pathogens were going up, I certainly would be in a different place than I am when these numbers are going down. So when I look at these numbers, and I see that E. coli is going down, and I know that I have a workforce that put a lot of time and energy to do a risk assessment, and then I have policy staff that said I want all the beef plants to reassess their HACCP plans -- that was my policy development -- and then my assurance group went out and did EIO assessments at all of the beef plants to make sure that the HACCP plans in place met the design of best plants. And I had all of those factors in place, and I saw public health illness go down, that

at least gives me some indication that what I'm doing is working.

Now I see salmonella is not quite as down as much as I'd like it to be, so right now as an agency I'm trying to put in place some strategies for that. I've got my risk assessment team gearing up on some risk assessments related to salmonella. I've got my policy development team trying to put some strategies in place related to policies in salmonella. I've got my field offices folks putting out -- they're out full force doing food safety assessments on salmonella. I've got some public meetings we're looking at related to salmonella. I'm hoping at the end of the day I'm going to see some changes on salmonella. So I do have to look at it in some ways, perfect though it's not, as some indication of what we're doing to affect public health. I'm hoping some day I'll have attribution to go with it. But it is what I have today to tell me that as an agency, I'm impacting on public health.

MS. CUTSHALL: Ms. Eskin?

MS. ESKIN: Two follow-up questions to Dr.

Masters. One is, again, attribution data and trying to get CDC to give that to you all. Do you know where they are in that process? That's one question, and then the second question, you answered part of my question, which is what are you doing now in response to the salmonella data, and the evidence based, again, just on this, that there wasn't as much of a decrease. You mentioned generally strategies. Can you give us any idea what some of those are more specifically? So we have a public health question and then a strategy question.

DR. MASTERS: Dr. Varghese?

DR. VARGHESE: Reuben Varghese. Let me address where we are on attribution. Currently at CDC the FoodNet has sponsored a point of processing attribution project which is being done at the University of Minnesota, and they're using our salmonella HACCP data as well as a few additional sources of information. They're trying to create a model that can help to get some salmonella attribution information, and the statistics for that model should become available by the end of this summer. It's part

of the graduate student's thesis project, so we are able to follow some of the process, but adaptive science, CDC, FDA, as well as the ten sites were part of the attribution committee that's part of the FoodNet that follows this. So we're making progress. We haven't seen a live model, but everyone's interested to see if that model will work, and when and how we can use it and share it with the other agencies, so that policy-makers can see how it relates to the attributions. So that'll be the first real product of this. Some limitations, of course, that we've had with attribution data, because as you know, we have salmonella HACCP data. What concerns me is that everyone would say everything -- salmonella ends up being emphasized. And that's really not the scenario CDC intended the FoodNet to try to do what we call the point of consumption attribution product, looking at outbreak data collected over the many years that we have data for to try to see if we can classify 11 food categories, you know, beyond just meat, poultry. However, we are having some funding difficulties with that. It's always a catch-as-catch-

can sort of situation. Hopefully the combination of that, we'll be able to put some of what we do in perspective so we can also say, we have our portion, and this is what we're trying to look at and focus on in our own agency.

DR. MASTERS: And then to answer the second part of the question. This is Barb Masters. As an agency more specific to what we're doing relative to salmonella in fairly general terms at this point. We're just working on our strategies. But our risk assessment group is looking at risk assessments both for poultry as well as for beef products. So those risk assessments are on our risk assessment agenda. We are working on a public meeting, and that date will be announced soon. We're getting close to having a date and a location. Looking at on the farm as a focus for that public meeting. We're doing that in collaboration with our partners at ARS, academia. We're hoping to have partners from the National Turkey Federation, the National Chicken Council who I've engaged personally. Both of those trade organizations to share with some of our concerns about the levels of

salmonella, both of whom have been very, very interested in what we've had to say to them, and both of them who have been engaged in trying to make some changes in their industries. Both of them have tried to put in some strategies. We'd like to hear from them the kind of things that they've made changes within their organizations. So that public meeting would be one for which would be more of a technical sort. I know there's a question to Mr. Johnson. So that would be more of an agency-wide technical meeting that we would see posting with the outcome of paper, and hopefully driving academia to do more research as to what could happen on the farm.

Policy. We're looking at policy development in two areas. One from highly virulent salmonellas. Salmonella Heidelberg is a concern. But also from the antimicrobial resistant salmonella. That's an area more of an emphasis. It's an issue. This is a raw product, and so we're looking at policy. It's a question that we've been asking ourselves on how we want to do a policy development. But I want to be very, very strong when I say here we are prepared

to take action as appropriate if there is illness being caused by product from a particular plant, that we know that that product is coming from that plant and is causing illness, is we are prepared to ask that plant to take that product out of the marketplace. So that is something that we have made a policy decision on, but we are looking at other policy questions that are before us.

We're also doing food safety assessments in poultry establishments with our EIAOs with a particular slant towards looking at salmonella, and the questions coming in related to the birds coming in as a source to that particular facility. And those are ongoing, and we're working with our Office of Public Health and Science to identify the plants from which we might have the most concern. I call them the hockey stick plants. They've been going up in their salmonella data over time.

And then finally we'll be looking at our food handler education at the end, particularly depending on what we find in our risk assessment. And also with our national advisory committee that you

heard Gerri talk about who is addressing the need and what we might do relative to cooking poultry. And I know Mr. Elfering raised a particular concern that came up from an outbreak in the states. So those are what we're looking at as our big, bold approach to salmonella. And part of that is being driven by what we saw as less of a reduction in salmonella. So when you ask how do I use that data, we're fairly passionate in how we use that data.

MS. CUTSHALL: Okay. I noticed some tent cards went down, so I assume that your questions were answered by Dr. Masters during that. We are getting close to break time, so I will take Dr. Hollingsworth's question as the last question before we take a break.

DR. HOLLINGSWORTH: In follow-up to the two studies that you mentioned, the attribution studies, are they being done, both the processing and the point of consumption, just for salmonella? Or will they be looking at other pathogens? In particular I'm curious about Campylobacter.

DR. VARGHESE: Reuben Varghese, OPHS. The

point processing is certainly salmonella at this point because we have a salmonella assay data, and we're going to try and find placements. What we've done on the task is try to take everything we know of what was really done on that attribution project really of this scale in the U.S. So salmonella is the pressing project, and we mostly have science data. The point of consumption as it's not part of FoodNet, what they are doing is they're taking a look at the CDC outbreak data they've collected over the years from the various states that they were required to report and so on. And that should be on all the various types of organisms that they have information on. But it's only as good as the algorithm information was, sometimes you know, outbreaks that don't in the end have a tight vehicle to attribute the organism to. So it's their first attempt at trying to say what 11 major food groups doing that assign some of the various organisms that they've discovered, as the data has come in. Over the years as they collect more information the goal is to combine that, and hopefully have a whole future -- that's not part of FoodNet.

That's a separate entity that the CDC collaborated with.

MS. CUTSHALL: Thank you, Dr. Varghese. That concludes our discussion of previous issues briefings. If we could take a 15-20 minute break and come back, we'll begin starting on the new issues that are before the committee for this session.

(Whereupon, the foregoing matter went off the record at 10:17 a.m. and went back on the record at 10:37 a.m.).

MS. CUTSHALL: During the break we handed out to you Dr. Alterkruse's presentation that you had asked about regarding data sharing. And Ms. West is handing out now the piece that Dr. Edwards kindly provided us from FSIS on BSE. So you would have those two pieces. We're going to start with our first issue. We're going to try and cover two issues before lunch. We are going to keep the doors open to try and get it a little bit cooler in here for you. I know it's been a little bit warm this morning. Again, I'll remind you that we will have the full room this afternoon, so we should be much cooler, and have a

little bit more space to deal with.

Our first issue is how can FSIS best share information on new technology with small and very small plants. And our presenter is Dr. Shaukhat Syed. He's the Director of the New Technology Staff in our Office of Policy, Program, and Employee Development. So please welcome Dr. Syed.

(Applause)

DR. SYED: Thank you. Good morning again. It is certainly a pleasure to be here with you today. The New Technology Staff is an experienced team which serves as the single portal for new technology submissions. Our purpose is to better manage the new technology process, and track its implementation. We also make sure that our FSIS personnel are aware of the new technologies and the way they are being used. As part of its long-term study, FSIS indicated it intends to provide technology development centers through the progress performance standard agenda that encourages the application of new technologies to diminish food safety risks to public health. Small and very small plants often lack the resources to

develop, assess, or adapt new technologies. Extending the use of food safety technologies to small and very small plants would benefit public health through the broader use of technologies that can improve food safety.

One of the development incentives initiated by FSIS under the aegis of the New Technology staff is funding projects through cooperative agreements. The goal of this incentive is to identify technologies suitable for small and very small plants, and foster their adoption to enhance the beneficial effect of new technology on food safety and public health. A cooperative agreement is a contract where FSIS and the cooperator engage in an effort to protect public health and create programs, especially studies to improve the safety of the nation's food supply. The cooperator provides necessary personnel, materials, available equipment, supplies, laboratory, library access, office space, and facilities for project investigation as mutually agreed upon. FSIS partially defrayed the cost of the project by reimbursing the cooperator for allowable, allocatable,

and reasonable costs in an amount not to exceed that agreed upon.

In 2003, FSIS entered into 19 cooperative agreements with eight universities and the Missouri Department of Agriculture. The cooperative agreements were scheduled to be completed by the end of September 2004. Of the 19 cooperative agreements that have been -- three have been posted on FSIS New Technology website. The complete electronic address is shown on this slide. Because this is the first year for deliverables, we are still talking with the cooperators, and additional technologies will be added to our website.

These three cooperative agreements have shown to be cost-effective for use in small and very small establishments for improving the safety of the nation's food supply. The first ever posted cooperative agreement is Texas Tech University's intervention for controlling food-borne pathogens in beef trim and ground beef. This cooperative agreement reports the effectiveness of acidified sodium chlorite, acetic acid, and lactic acid. The

antimicrobial factor in this intervention were evaluated by inoculating beef trim, and collecting samples immediately after treatment, immediately after grinding, 24 hours after grinding, and after five days of refrigerated storage, and after 30 days of frozen storage. For all samples inoculated with a low dose of salmonella species, and E. coli O157:H7 there were no detectable pathogens after all of the five treatments, while the control contained detectable amount of both pathogens. Another important observation was that the treatment with 4 percent organic acid did not have an additional benefit over the 2 percent treatment for both salmonella species and E. coli O157:H7.

The treatment with organic acid and acidified sodium chlorite significantly reduced salmonella species and E. coli O157:H7 on beef trim prior to grinding. And the results were sustained during refrigerated and frozen storage. In addition, there was no advantage of using high concentration of organic acid over low concentrations. One thousand PPM was the acidified sodium chlorite dose used on the

trim, and combination of organic acid and acidified sodium chlorite offered no additional reduction in bacteria count. The small and very small establishment benefit is that low-cost organic acid at low doses are as effective as acidified sodium chlorite dose in controlling salmonella species and E. coli.

The second posted cooperative agreement is Texas A&M University's development of a carcass sanitizing spray system for small and very small slaughterhouses. This cooperative agreement intends to help small and very small plants that slaughter beef and pork to comply with food safety regulation through the development of a sanitizing system with high performance of spray distribution at low cost. The Sanitizing Halo system was designed to be built from material purchased from a home improvement store and assembled in a small shop with common tools. This system has two square frames, one for beef, the other for pork. The delivery of the antimicrobial solution is made through a series of nozzles arranged so all regions of the carcasses receive the same amount of

solution. The pumping system delivers the antimicrobial solution at a maximum PSI of 40, and spraying time was 20 seconds. The system delivers 1.5 gallons of solution on each side of the carcass. Using lactic acid as the antimicrobial solution, tests were run on treated and untreated carcasses.

A total of 300 centimeters squared per carcass were collected from the rump, brisket, and clod region of the beef carcasses, and jaw, bacon, ham region of the pork carcasses. Each sample was plated on E. coli and Aerobic Plate Count Petrifilm plates for counts of coliform and E. coli, and mesophilic and aerobic. The counts of aerobic and mesophilic bacteria obtained from the carcasses sprayed with the sanitizing spray system were significantly lower than the counts on the carcasses sprayed with the hand spray method. Bacteria count for coliform were below the detectable limit for both treatments. The Sanitizing Halo system can help small and very small plants in slaughter and processing meet the food safety standard at an estimated cost of $286.

The third posted cooperative agreement is

the University of Wisconsin's post-processing pasteurization of beef snack sticks and natural casing wieners to control Listeria. This cooperative agreement tests the use of boiling water as a post-lethality treatment under Alternative 1 or Alternative 2 of the USDA interim final rule on Listeria in ready-to-eat meat and poultry products. The boiling water needed to ensure at least a 2 log reduction of Listeria on packaged ready-to-eat beef snacks and natural casing wieners. An average reduction of at least two logs was obtained using heating time of one minute for a 5-strain mixture of Listeria for individually packaged beef snack sticks. The identical average reduction was obtained for a 4-minute heating treatment of four- to seven-per-package beef snack sticks. A treatment of seven minutes for four-per-package natural casing wieners produced the average of 2 logs reduction. Small and very small establishments benefit from the establishment of low-cost boiling water as a post-lethality treatment of Listeria for ready-to-eat products.

In 2004, FSIS entered into eight

cooperative agreements with seven universities. The cooperative agreements are scheduled to be completed by the end of September 2005. Of the eight cooperative agreements, four of them deal with beef jerky, since in several recent incidents of Listeria and E. coli O157:H7 contaminated beef jerky products were reported. And most of these incidents involved small and very small plants. So FSIS entered into the four beef jerky cooperative agreements on such research studies as new intervention of pathogens in the processing of beef jerky, and validation of reduced humidity cooking of beef jerky products. The New Technology staff is looking forward to seeing the finished research and conclusions.

After 2004, the data is supposed to come September of this year, and then on April 21, 2005, FSIS announced that it is accepting proposals for cooperative agreements projects to be funded in Fiscal Year 2005. The cooperative agreements funding will range from $25,000 to $75,000 per cooperative agreement. The proposals will be ranked and funded based on whether they satisfy certain factors. And

these factors are help small and very small plants meet the HACCP and food safety requirements, help small and very small plants to understand how to demonstrate that the new technology complies with the food inspection requirements, advise a degree of innovation, applies new research and technologies that address current food safety and public health concerns, such as properly handling and labeling products that contain ingredients that are known allergens, provide deliverable product used for the small and very small establishments that are easily transferable, such as video, training programs, and flow charts. Some examples include developing a training program to help small and very small plants reassess their HACCP program to address ingredients that may be allergens. Development of easily understood predictive microbial model for salmonella on carcasses during cooling process. Number three, development of an easily understood predictive microbial model between the level of salmonella and the temperature at which eggs have been held from the day of flay until the day of processing.

The agency welcomes input from all interested parties, and encourages the free exchange of ideas as it continues to work to enhance the safety of the food supply. In turn, I would like to solicit your help in three areas of concern. And that is what is the best ways to get information derived from the cooperative agreement to small and very small establishments. How does FSIS present scientific information to small and very small establishments effectively. How does FSIS access the small and very small establishments that do not belong to a trade organization.

New Technology and FSIS are going to put more developments on the website. And also, during a meeting with Mary, we are going to have a flyer distributed leading an assembly format what the developments are on the website. But the question is we need some more guidance how we can reach the small and very small plants. Thank you again for the opportunity to speak with you today, and now I think we have some time to take your questions.

MS. CUTSHALL: Ms. Eskin?

MS. ESKIN: Thank you. I don't know if you can provide this information, or someone can. I'm just curious again, at this point we talk about small and very small plants. How many are there? What volume of product do they produce? And I guess for some types of products they may in fact produce a lot of product. Do you have that data? Just getting a sense of sort of what they are in the market?

DR. SYED: I don't have data for the nationwide at this time. But I was a deputy manager in Albany, New York, which has the largest concentration of very small plants. Albany district is comprised of New England, New York, and New Jersey. When HACCP was implemented, there was 239 give or take small plants, and between 660 and 652 very small plants.

MS. ESKIN: Remind me how those are both defined?

MS. CUTSHALL: I can answer your question, and probably a little bit more thoroughly. It hasn't changed very much since HACCP implementation, at which point we had out of the 6,000 plants that we federally

regulate around 200 to a little bit over 200 were actually large plants. Large plants are constituted of 500 or more employees, small are between 10 and 499 employees or greater than $2.5 million in sales, very small are less than 10 employees or less than $2.5 million in sales. And that's only the federally inspected plants. Our state partners here can verify that all of the state inspected plants are small or very small.

So the preponderance of plants that we actually regulate are small and very small, and you are correct in that a number of very small plants may produce a very large variety of products. They may produce --

MS. ESKIN: Particularly --

MS. CUTSHALL: -- a significant volume of those products.

MS. ESKIN: A particular type. And there's I guess, right. In some way trying to track, for example, looking at all the issues and the technology, and what issues will impact plants it's probably hard to determine, to prioritize those in

terms of -- or maybe it isn't -- volume. In other words there are products, a lot of small plants producing X product, and that product is associated with a particular pathogen. Is there any way to?

MS. CUTSHALL: We don't have as good of data on volume.

MR. LINK: With the doors open and the noise I can't hear half of what's being said. Is there a way to do something?

MS. CUTSHALL: Is my microphone on? It doesn't sound like it. Let me try and put it closer. Is that a little bit better?

MS. ESKIN: Yes.

MS. CUTSHALL: Okay. Repeat your question?

MS. ESKIN: Yes, and I'm sorry. It's just the point -- you were saying you don't have very good data --

MS. CUTSHALL: Correct.

MS. ESKIN: -- in terms of trying to put some sort of --

MS. CUTSHALL: There are --

MS. ESKIN: -- between products and products that -- issues, food safety issues, and technologies and such.

MS. CUTSHALL: We don't have very good volume data, but we do have information that we can derive from PBIS. Because for each federally inspected plant, and for those state inspected plants that are under PBIS, we know from the HACCP procedures what particular processes are being conducted in a particular plant. And we also know the plant size, whether it's small, very small, or large. We can look at that data and make some determinations.

When Dr. Syed mentioned the fact that we did come out with a Federal Register notice this year, it was not just a Federal Register notice that covered new technologies. It covered all our cooperative agreement outreach to all our constituents. So it had a number of parameters in it. It had the New Technology staff, it had some of the work that's being done by the Animal Production staff in our Office of Public Health Science. It also included the outreach that we do in Office of Public Affairs, Education, and

Outreach for states, locals, retail for academia and for the small and very small plant outreach that we do as well.

MR. DERFLER: My name is Bill Derfler, and I work in the Office of Policy. We actually do have volume data with respect to plants that may post validates both ready-to-eat products. That is a requirement of our regulations. It was dairy regulations that we put out in 1993, and we do have the data for volume per dose points.

MS. CUTSHALL: Mr. Elfering?

MR. ELFERING: Just maybe a question to narrow our focus a little bit. You talked about eggs and egg products. This information, is it mainly meat and poultry plants that you want to be targeting? I mean, egg products to me does not fall under these small and very small categories, or at least in my experience. Shell egg handlers, you also have some development of information in addition to what the regulations already require for control of Salmonella enteritidis? In a breaking plant, you have pasteurization. Are there other technologies that

have been developed that would assist the plant in reduction of Salmonella enteritidis?

MR. DERFLER: This is Bill Derfler. I think our immediate focus would be on meat and poultry products. I mean, we do have plans to at least propose to extend HACCP to egg processing plants. And we're also looking at the possibility of what we should do with respect to shell egg handlers. But for now, what we would find most useful is guidance to help with respect to meat and poultry.

MR. ELFERING: The reason I bring it up is I'm chairing this committee, so we're going to probably focus more on meat and poultry rather than eggs and egg products for this.

MR. DERFLER: At this juncture that would be most helpful.

MS. CUTSHALL: Dr. Logue?

DR. LOGUE: Catherine Logue, North Dakota. Just a question, just out of curiosity. At the beginning of your talk you mentioned that you had like 19 agreements, or 17 previous agreements. And okay, from those you've got about three that have given you

some useful information. What about the other ones? Is there something coming out later?

DR. SYED: We're going back and forth with the scientists, the researchers. And as soon as we -- because some of them got the low cost extension. There was a few other problems. We are looking into it. We are talking to them back and forth. As soon as we have the complete information, and then the review when they look at it, they will be counted on the website. I know one bunch should be in today or tomorrow.

DR. LOGUE: Okay.

DR. SYED: So we're moving along. As soon as they are coming back to us.

DR. LOGUE: All right.

MS. CUTSHALL: Mr. Kowalcyk?

MR. KOWALCYK: Michael Kowalcyk. I just had a couple of questions, I guess, about these studies. If we can have a hard copy of your presentation to take with? If convenient, that would be very useful. And also, I had a question specifically about the Sanitizing Halo study. It

seems like something where you're building a mechanism that's going to be part of a process. There could be certain intervals where you would have downtime, or it could be maintenance issues, something like that. Did the studies take into account I guess the implementation of this type of technology? I'm on this subcommittee, and I think one of the things that I would imagine small producers would wrestle with is how they can implement the technology in a manner that's not breaking your bank. And I was just wondering if there was any insight from these cooperative studies that would shed light on implementation issues that come up as a result of this.

DR. SYED: I can't address that. Small and very small plants can use this process as a validation process for the hazard. But this much I can answer. I don't know, for the other question you have. I need to get back to you. But they can use it because it's a cost-effective, low-cost for small and very small plants to validate their HACCP process.

MS. CUTSHALL: Mr. Govro?

MR. GOVRO: Looks like I'm the next domino here. Mike Govro, Oregon. I would like to ask what FSIS has done, beyond posting the information derived from the previous cooperative agreements on its website, to communicate the information to small and very small plants, and if so, what challenges have you encountered?

MS. CUTSHALL: Well, I can talk about some of the things that we have done with the deliverables that we have received. We do a number of different things with outreach. We have had CDs that have been put together, and we distribute those. We do a lot of mass distribution. Whenever materials are developed for us, oftentimes what we do is put them in hard copy, possibly put them in a CD. If it's a video we go ahead, and whenever we get something new in we do a mass distribution. And generally we work with the state, the state offices, we often make them aware of it. So we do mass mailings. We post it on our website. We put it in our brochure. We make sure that it's available to everyone. We also for each EIAO that goes through the EIAO class as well as the

PHPs that go through as well, we provide them with an entire package of all the deliverables that we have, and then they go around and start doing their work. They have the information that they can deliver to small and very small plants. We work very closely with a number of universities. I think I've mentioned before that we have a contact or coordinator at a university or with a state program in all the 50 states as well as Puerto Rico and the Virgin Islands.

So we try and continue to keep people updated. We have conference calls. We work with district managers. We have a number of different types of materials. As I said, we have hard copy available. We have CDs. Videos. We have brochures. We have all kinds of different things. And one of the things that we're actually working on now since we are -- not that what we do is relatively new, but strategic initiatives, partnerships, and outreaches of relatively new directorship within the organization. We're also working on a promo CD kind of business card video that we're going to make available to everyone, that talks about here's what we do, here's the kind of

things that we have available, so that we can continue to promote what we do.

One of the things that we have stressed in our outreach, and with what we're doing in the Federal Register notice as well is that when we award to a cooperator, that we make sure that what is going to be delivered to us, number one is, as Dr. Syed said, is simple, is easy to understand, directed to the small and very small, and that it has national impact. So that we're not awarding cooperative agreements that are only good in Milwaukee, Wisconsin, or Washington State, or New York City. We want cooperative agreements that can work across the board so that we can most effectively use our money to impact the greatest number of plants. So we're trying to be very inclusive, and also to make sure that within all the program areas we're working together to know what cooperative agreements are being awarded, what our priorities are, so that we can use our money as an agency most effectively, and make sure that we're involved in as many universities, as many as entities, as possible to be able to get the best products that

we can.

MR. GOVRO: Have your efforts been effective in distributing this information? I'm trying to get at why you're asking the question, and what's missing.

MR. DERFLER: I want to answer why we're asking the question. This is a new portion of this effort by us. And we really do want to make sure that we get the information out to as many small plants, that we're not missing people in doing what we're doing. This is not just information. We are looking, as Dr. Syed said and Mary said, we are looking to try and get the information in a readily usable format. But there are a significant number of small and very small plants that aren't members of trade associations, for example. So how do we go about reaching them? We tried some things. Are there other things that perhaps use greater activities and greater -- things you've been able to accomplish that would help us to get this information out. We're trying to -- I mean there have been problems, for example, with validation of new interventions. Some of the

cooperative agreements that we had went to that, went to the issue of validation so that -- and if we can find a way to effectively get that information out, effectively get improvement to the source of the information, then we'll have a consequence to try and produce. So that's what we're about, and that's why we need any help that we can get.

MS. CUTSHALL: Mr. Finnegan?

MR. FINNEGAN: Yes. Dr. Syed, you referred to acid carcass rinse, and in particular, using lactic acid. Have you had any problems with a mold growing on carcasses after? It's kind of a black mold? The class that have experienced that, a large-particle lactic acid. I wonder, have you noticed that at all?

DR. SYED: No. The deliverables that came in, that they were 60 - 90 pages, we went through. They're quite lengthy, the deliverables that come in. But there was nothing from the research mentioned that they saw that problem.

MR. FINNEGAN: Dr. Gary Acuff, I think he's from Texas A&M. He came in and he took some of

these samples to try to determine what that is, what kind of a mold it is.

DR. SYED: We can look at it, but what I can say is what we received from the researcher. They didn't mention that.

MR. FINNEGAN: You haven't had any problems?

DR. SYED: No.

MR. FINNEGAN: Okay. Just one other thing. Talking about cooperative sharing information. I've had a lot of experience with Mary Ann Cutshall's group. In fact, her and Bryce came out and attended our HACCP class, sat in and participated. And I believe Mary's going in the right direction. She certainly helped us out. Every time I've called her up I got what I wanted.

MS. CUTSHALL: We're here to serve.

MR. ELFERING: That's going to be our top one on the list is call Mary.

(Laughter)

MS. CUTSHALL: But no, absolutely, anytime you've got questions you've got concerns, please do.

Please call myself or my staff, because we are there to really do outreach, and to help you all. Dr. Hollingsworth, did you have a question?

DR. HOLLINGSWORTH: Well, I was actually just going to -- because I'm not on this committee, just throw out some thoughts, and some things that from the trade association we've used to try and get information out, particularly to more remote locations. And that is I would suggest that this committee look at opportunities like universities and extension agents. We had tremendous success with extension agents who were sometimes even down to the county level. And Dave knows the people who we worked with. And we'd just walk right over and visit with them and talk with them. So I would just suggest to this committee they think about that as a possible resource.

MS. CUTSHALL: I agree. We've had a lot of good luck working with extension agents at the universities, and a number of our coordinators are associated with the extension service. Dr. Leech?

DR. LEECH: Irene Leech. I wanted to know

a little bit more about the mass distribution, where that list comes from, what that really entails.

MS. CUTSHALL: Well, I can give a couple of examples. Over the past few years we've had workshops that have been associated with new policy developments from Phil's group. Everything from Listeria to BSE, E. coli. Now we're looking at food defense and security. Every time that we put materials together, Policy and Field Operations will share information with our staff. What we try and do is take that information, make it as simple as possible, put it in an easy-to-understand format. Oftentimes it's associated with the workshops, so we'll put together a book, something similar to this. We include CDs that our Center for Learning develops to go out to our inspectors. So it would include, you know, in these particular examples that I gave you it's all the PowerPoint presentations, all the affiliated regulations, directives, notices.

DR. LEECH: How do you figure who to send it to?

MS. CUTSHALL: I was going to get there.

I'm going. Once we get all that together, what we can do is just go into PBIS. And we use PBIS, and we're able to print out a mailing label, mailing list for every single plant that is under PBIS. That additionally includes some things that, for example, within the context of food security or food defense, AIIS, that covers imports. We also work with the states, as I said. We will go to our state, federal-state staff and provide them with the information. They in turn will talk with the state directors, find out how many copies are needed, and we'll do just a mass mailing. So we'll send out 6,000, 7,000, 8,000 at a shot.

In turn, we also add that to a brochure that we have that we distribute. And as people want more material, new material, they can order from that. We also send it to all our contacts and coordinators so that they can use that for teaching and training courses. So whenever we go to distribute, we're using PBIS data, and our contacts with the states, and our contacts with academia. So generally, when I talk about a mass mailing, we'll probably do a mailing of

10,000 of each package, and then continue to supply that information as is needed.

DR. LEECH: Okay. That's all.

MS. CUTSHALL: Dr. Denton?

DR. DENTON: This might be the same question -- James Denton from the University of Arkansas -- kind of phrased in a little bit different way. I started thinking about this a little bit more pragmatic, I think, in my thinking. You'd already indicated 6,000 plants, about 200 of which are large, which leaves 5,800 that are small or very small under the federal inspection umbrella. My question was do you have the contact information for all those plants, both federal and state inspected, in one database that you utilize as a way to contact or communicate with these folks with regard to this? Thinking about it in the first question, what are the best ways to get the information, and then talk later about how, which I think is how the message needs to be framed. But my question was how do you identify all of the plants, both federal and state, so that you do have that direct communication with them when you try to

communicate this type of information.

MS. CUTSHALL: As I said, for federal plants we use the PBIS database. We have to rely on our federal-state office, because we don't have access to PBIS system for state, so we can't automatically pull up and create the labels as we would for federal plants. So what we try and do is work as closely as we can with state directors, and make sure that they're aware of what we're doing. We also work closely with our district managers, so our district managers can work with the state directly. I will admit that it's been much more difficult for us to actually make sure that we are getting that blanket coverage of state plants that we would like. And any ideas that you can come up with to help us we're certainly open to, because the better job we do, I think, the better job plants can do, and that's good for us all because it's just going to improve food safety.

DR. DENTON: I think the same way, particularly when you're thinking about how you work with the states. There needs to be -- and I'm

thinking out loud here, folks. I don't want to get ahead of the committee. But thinking about how you have a champion with regard to communicating these particular issues to those small and very small plants within every state I think is going to be the lynchpin on how successful we are. And having that state partner is going to be absolutely critical to getting this done, and communicating that particular set of messages that you want to try to communicate.

MS. CUTSHALL: And I think that's one of the reasons that in our thinking on this particular issue that we asked Kevin to assist us in it, because he's got a good state perspective.

In the interest of time we are going to move on to --

DR. SYED: Thank you very much.

MS. CUTSHALL: Thank you, Dr. Syed. We're going to move onto our second presentation. And the second topic is what guidance can be provided to industry to ensure that plants hold product when FSIS tests product for an adulterant. This issue has come before the committee before in several different

forms, but I think when you hear from Mr. Gioglio, he's going to phrase the issue and the questions in a new way.

So I'd like you to welcome Mr. Charles Gioglio. He's the Director of the Inspection and Enforcement Initiative Staff in the Office of Policy and Program Development. Mr. Gioglio?

MR. GIOGLIO: Thank you, Mary. And good morning. One thing I'd like to start off to echo the welcome and the congratulations that we heard this morning from Dr. Masters and Dr. Pierson. I've had the privilege of working with a number of you before, but a number of you that are new to the committee I appreciate and I look forward to working with you this afternoon for this issue, and in the future.

As Mary mentioned, I guess it's just about a year ago I presented an issue to the committee actually regarding agency sampling, but specifically about whether or not, as was mentioned earlier, we should hold the decision on awarding the mark of inspection to the particular product until we get a negative result back that would represent that

particular production. The issue that I'm going to talk about this morning is related to that, but it's not exactly that. In fact, the committee deliberated for us, and gave us some recommendations. They did not reach a consensus exactly on whether or not we should take a rulemaking, or issue a formal policy to do that. However, they did come back with a number of recommendations about how we should proceed. Among them were that the agency should continue to encourage plants to hold samples voluntarily when we pull -- excuse me, hold product lots voluntarily when we pull samples for an adulterant. Another recommendation was that the agency should provide guidance to the industry for holding products represented by samples, and that in fact we should work with industry on strategies to mitigate those problems, too. As we were just talking before, the majority of plants which are small and very small plants. And here I think we're probably focusing mostly on the very small plants.

The agency considered the advice of the committee, and in fact met with industry to discuss

the issue. A group of industry trade associations, which really represented a pretty wide array of the trade associations representing plants from the largest, actually, to the smallest type plants, went ahead and drafted guidance that would get at some of the practical issues that plants face to be able to hold product. The agency also went ahead and we drafted guidelines that could be issued that focus on providing practical advice to small and very small establishments. One of the other things that the committee did recommend to us is that we increase our effort to educate our own inspectors in this area, and how they should provide notification to plants. To that end we have in fact issued actually recently three IKEs. Our staffs worked with the folks in the technical service center to issue three IKEs, which are Information Knowledge Exchange, aimed at providing instruction to inspectors of when and how they need to provide notification to plants that we're pulling samples, in order to allow the plants ample opportunity to hold all of the product that are represented by those samples.

That really gets us then to what the next steps on the guidance is. Obviously, both the agency and the industry agree that a practical approach to preventing recalls includes encouraging establishments to voluntarily hold product, and to have those establishments, especially the small ones, go ahead and do so in a practical way, and provide -- so then it's incumbent on us to provide that guidance to them, and that information.

Really, then, the question is what is the best way for us to provide that guidance. Both the industry and the agency to provide that guidance. And that's -- we're presently seeking advice on the most effective way to do so. Especially, again, to the small and very small plants, which is -- when we look at the data, that in fact is where this problem I think is most uniquely seen, at the small plant level. In fact, if you look at last night, there was a recall that could have been avoided. It was from a small plant up in -- it was either the New York or the New England area, where it was an agency verification sample. The plant for one reason or another did not -

- decided not to hold the particular product, and it's incumbent on the agency to go ahead and request a recall, then, from that plant. We think this is a way, if we can get this word out and provide the industry with practical guidance that they can follow, we think this is in fact a good way to prevent those preventable recalls.

So the questions then become should the agency issue its guidance for holding product when we sample for an adulterant. And what then should be the focus of the agency guidelines? In the same way, what should the focus of industry guidelines be? Should the agency and the industry issue their guidelines simultaneously? Or, should the agency wait until the industry issues its guidance, and then determine their effectiveness before deciding whether or not we should issue the guidelines that we have developed?

I'll stop right there. I know it's difficult to see the screen for the presentation, and we'll make the PowerPoint available to you in hard copy if you need it for your deliberations earlier and so forth. I guess I can take your questions.

MS. CUTSHALL: Mr. Elfering?

MR. ELFERING: One question I have is, first of all, what is your turnaround time on getting samples? Would you release a negative result, and for example, are you doing PCR? And would you release a negative on PCR results? How fast are you going to get negative results back?

MR. GIOGLIO: Typically the negative results, it depends on -- obviously it depends on the organism for which we're testing, but could run -- negatives could be about a 2-day turnaround from the time of collection to a negative, let's say, for an O157:H7 sample, where we can report the negative out on the initial screening test. For Listeria and salmonella it may be a little bit longer.

Obviously for the positives, if I could just extend your question a little bit, for positives it could take up to about eight days before we can actually release. The other thing we do, for obvious practical reasons, and regulatory reasons frankly, is that if a sample is being analyzed for more than one adulterant. Let's say, and this is in fact our

practice to test samples, to analyze them for both salmonella and Listeria monocytogenes, if it's a ready-to-eat product, we will not release one result before the other one is completed. Because we wouldn't want to release a negative, and then have the other organism come back positive, and you know, set up a problem like that. Did I answer your question? Okay, great.

MS. CUTSHALL: Before I take the next question, I'd just like to point out to you that Mr. Gioglio has provided you with a draft of the industry guidelines that he referred to in his talk.

MR. GIOGLIO: Right.

MS. CUTSHALL: So, just as explanation for what you have just received, that is industry guidelines that they collaborated on.

MR. GIOGLIO: And I'm not quite sure if in the briefing book, did they get a copy of our guidelines that FSIS put together also? I believe we can make those available, also, for the subcommittee to take a look at.

MS. ESKIN: Yes, those were actually two

of my questions. I have a number of short questions. You mention in the briefing paper here that of the recalls that were resulting from FSIS testing, the one-third, of those most of them were conducted by small or very small --

MR. GIOGLIO: Small and very small plants.

MS. ESKIN: How most? Was it most like 60 percent, like 80 percent?

MR. GIOGLIO: Actually, when I look at it, when I say ?most? there, I'm actually looking at close to 100 percent, and it may in fact be 100 percent in any given year. As was mentioned earlier, those that fall into the large plant category are actually, you know, only a couple of hundred plants. Typically they would have the wherewithal to hold the entire sampled lot, and generally don't get caught, you know, by having shipped product. In this case, when we take -- I'm not saying they never conduct a recall. I'm saying that, you know, when we take a verification sample. So that, when I say ?most?, that's really what I mean there. I didn't have, you know, the exact number there.

MS. ESKIN: A couple of other just quick questions.

MR. GIOGLIO: Sure.

MS. ESKIN: This is a basic question. Does FSIS have the authority under law to require that product be held? Again, what we're talking about here is voluntary action.

MR. GIOGLIO: FSIS, we believe that we do have the authority. However, we would need to work through, to effect that policy, we would need to work through notice-and-comment rulemaking --

MS. ESKIN: Right, doing the process.

MR. GIOGLIO: -- and so forth to do so. We believe that we can make the legal argument to do so. I would add that we think that that process would probably be a couple of years, and I think we talked about this the last time, you know, in the subcommittee. That would probably take us, you know, about two years to formally issue a proposal and work through comments and so forth to effect that policy formally.

MS. ESKIN: Okay. That's fine.

MS. CUTSHALL: Dr. Harris?

DR. HARRIS: Yes, thanks. Joe Harris from Southwest Meat Association. And as you've received the copies of this you can see that our association was one of those that participated, and thought I would like to comment just briefly on where we were with all that.

We did not get copies of the FSIS guidelines as of yet. I think when we do you'll see that there is a tremendous amount of similarity, or potentially even identical language in a lot of ways. We convened a group of about 20 actual establishment employees to develop these, and we did have a draft copy of the FSIS document ahead of time so that we could make sure that we tried to encompass the agency's needs as well. Our approach was hopefully -- our objective was to make sure that we had it so that practicality issues that the small plants were facing could be addressed by plant employees, and they could tell us, you know, face to face why this will or why this won't work for us, because our goal is the same as the agency's in terms of we want to absolutely

reduce the number of recalls, and especially those that are very avoidable by companies holding products.

I will point out that while a very high percentage as we've said of those recalls are small plants, I suspect that percentage would go down somewhat if we looked at the volume of pounds of meat that have been recalled. But that's neither here nor there because it's in all of our best interests to keep product out of commerce if it's going to test positive for an adulterant.

So with that I wanted to give a little background. And as an industry, we can add things to the guidance materials that the agency is not quite as well-equipped to do. The agency obviously has very strict procedures that they have to follow on what they can and cannot say to industry, and tell plants. We thought we could do a good job of incorporating what the agency's needs were relative to guidance, while also providing some real useful forms, suggestions on how they collect data, suggestions on how they actually do things on a day-to-day basis that would be useful. And I will tell you that this

document is very near complete and ready to be disseminated. So I just kind of wanted to add a little bit of information to that, and leave it at that.

MR. GIOGLIO: Thank you.

DR. LEECH: Could I just ask a follow-up question? Irene Leech. Is it impossible for the agency to ever be able to work in a fashion that's on the same kind of timeline as the industry does? Is that just our historical way that we do things, or do you perceive that in order to have a government process there's no way it could ever be made so that the agency could operate as fast as, say, the trade associations do?

DR. HARRIS: That's kind of tough for me to address.

MR. GIOGLIO: Yes, I think I can address it. If we're talking about taking -- effecting a formal policy in notice-and-comment rulemaking, then yes, I guess the short answer to the question is yes, it is. There are a number of obvious reasons, clearances, and you know, approvals that we as an

agency need to work through in that public process before we can just go ahead and issue, you know, a new policy. Including something that Joe mentioned before. Even in a set of guidelines or something that's voluntary, if we produce forms that we would expect -- even worksheets that we would expect industry to use, we need to get OMB clearance for those forms. And that could take some time. And it's certainly not impossible, and there are emergency rulemaking provisions in the laws, and so forth, which we have used at times. But there is a difference between what I think the trade associations can do and what the agency can do.

DR. LEECH: Well, and I realize now that it was kind of a matter of trying to figure out whether it's a matter of we've got to live with that because that's the way it is, or whether it's a matter of trying -- being able to possibly change something to make it more flexible. That's what I was trying to get to.

MS. CUTSHALL: Mr. Kowalcyk?

MR. KOWALCYK: Michael Kowalcyk. In your

discussion, you mentioned that a significant number of establishments do not hold product when a sample is taken.

MR. GIOGLIO: Yes.

MR. KOWALCYK: Does the agency have an estimate as to what percentage of regulatory samples taken result in product not being held back? I mean, how significant is this?

MR. GIOGLIO: I do actually -- I'll need to -- I have those figures, and I'll work those out together with the subcommittee this afternoon. I did get those figures before I came. I didn't work out the percentages. I could tell you that just quickly eyeballing it, it looks as if about 20 or so percent of the samples that we collect for adulterants, and those I'm looking at, O157:H7 in ground beef products, and for ready-to-eat products Listeria monocytogenes and salmonella. It looks consistently about 20 percent or so are not held based on our sampling data. I didn't get my calculator out while I was here, but yes, that's about it. That's about 20 percent or so, which we think is a significant amount.

MS. ESKIN: 20 percent of?

MR. GIOGLIO: Of samples that we collect that are in fact, for whatever reasons are not held, the product represented by that sample are not held by the establishments. And there could be any number of reasons why an establishment may take that decision.

MR. KOWALCYK: That was the one follow-up question I had was, based on your interaction with the producers, what are the typical reasons? What are the barriers that they face when trying to hold product?

MR. GIOGLIO: Some of the barriers that we've heard and that we have taken steps already to try to correct was we've heard from industry over time that they don't get adequate notification by the inspectors. We do have formal policy in direction to our inspectors that they are to notify the establishments when they are going to take samples. And in fact, as I mentioned earlier, we've put even more recently more specific guidance through what we call our IKE system to those inspectors in providing them some scenarios, you know, to help them think through of when exactly they need to provide that

notification to the establishment. That's one.

There are, I think you'll hear from trade associations, and I don't mean to speak for them. But that there are other practical problems that they have. They don't have the physical space. I think the subcommittee had pointed out the last time that they have short turnaround times from their customers that they need to supply the product, and things like that. You know, more of those practical, business-type problems that the agency does not have the control over.

MR. KOWALCYK: Thank you.

MR. GIOGLIO: Thank you.

MS. CUTSHALL: Dr. Hollingsworth?

DR. HOLLINGSWORTH: In follow-up actually to some of the previous comments regarding how to involve the industry in an agency guidance.

MR. GIOGLIO: Sure.

DR. HOLLINGSWORTH: It would seem to me that this presents itself as an outstanding opportunity for the government and the industry to work together. I think anybody would agree, just from

a practical standpoint, having one set of guidelines is certainly the preferred method. The worst case scenario, two sets of guidelines and they don't agree. And not having ever seen the industry ones or the government ones, I'm assuming that's one of the things this committee will look at, is how similar are they, and if they are similar, why does there need to be two? Can't there be one? When I first saw this issue, to be honest with you, my first reaction under the questions was why isn't one of the questions can the industry and the government put out a single, joint, we-both-to-agree kind of guidelines. And I hope that is one of the issues that they can at least consider. I understand all the ramifications of forms, and paperwork reduction, and all, but again, if it's just a voluntary guidelines, I don't know if those things apply. You're not telling anyone they have to do it anyway. So I'd like to at least hope that this committee has that option of looking at let's collaborate and do one thing, and let's do it together.

The other question that I had Charlie,

though, I wasn't sure on Question Number 2. It said what should be the focus of the agency's guidance. Can you clarify that for me? I'm not sure what you mean by the focus of the guidance. If in fact the guidance is recommendations for how to, or the value of the benefits of holding product, what was meant by the focus?

MR. GIOGLIO: Right. I think that that is the general, that what you're point out, Jill, that is the general of a broader focus of the guidelines. And the objective would be to get these establishments to in fact hold the product. But what, when I ask I guess what should the focus be, is should the focus be on trying to deal with the practical business issues that we touched one earlier, you know, that I mentioned earlier as far as dealing with their customers, and things like that, or figuring out ways to store product. Or the communication with inspection personnel.

I think as you know, Joe pointed out earlier, and my review of both sets of guidelines, they are both similar substantively right now. Our

guidelines probably do focus a little bit more on the upfront communication with inspection personnel than the -- and I think the industry guidelines do go a little bit more into the other issues. And that's really just to look at them both and give us, you know, that type of advice. To your first comment, I think that that's what we are really asking the subcommittee, and then the committee as a whole to come back with us with recommendations along those lines.

DR. HOLLINGSWORTH: And I guess one last point is I would like to again ask the agency to please try to extend the opportunity to hold product to retail, because as it currently exists the agency says they will make an effort to pre-notify retail when samples are collected.

MR. GIOGLIO: Right.

DR. HOLLINGSWORTH: But it does not seem to be as enforced, or as emphasized as it is in federally inspected plants. Although I will say, before I came here I did a quick check of some retail stores that have had samples, and the majority of them

did say that they are getting pre-notification, and we appreciate that.

MR. GIOGLIO: Thank you.

MS. CUTSHALL: Mr. Govro?

MR. GOVRO: Mike Govro, Oregon. In the first sentence of the second page of your briefing, you state, ?Recalls are resource-intensive and costly in numerous ways for both the agency and the industry.? And it seems to me that in the absence of requirements for holding, the next best thing you could do would be to make a compelling argument that it is a sound business decision for a business to hold product. And I was just wondering if the agency, or if this group that's created the draft here has attempted to put some numbers behind that statement, and make an argument that would be persuasive to small businesses that they should hold product. Or if that should be something that should be attempted.

MR. GIOGLIO: I guess I will say that in the document as it exists, there's no sort of economic analysis included into that document. Our objective there is to say everybody needs to be holding, and

here's the steps you need to go through. Definitely take that into consideration, though, as far as the potential way to help make a case for doing that.

MS. CUTSHALL: Mr. Schad?

MR. SCHAD: Mark Schad, Schad Meats. Thank you for that comment because when I -- besides the food safety issue, when I talk to other very small plants, that is my main argument. It's smart business to hold products. It's not always easy to hold products, but it's smart business.

I had a question about the IKE scenarios. I've just seen the one on prior notification for ready-to-eat products. You mentioned three. What were the other two?

MR. GIOGLIO: Right. There was --

MR. JOHNSON: It's a series of three, and the last one actually --

MR. SCHAD: I just mean one I saw recently. On RTE.

MR. GIOGLIO: One went out yesterday I believe. Both of our ready-to-eat, those two were both about ready-to-eat products.

MR. SCHAD: Okay.

MR. JOHNSON: Yes, it was basically -- the scenario is basically inspectors to take what's in that -- this is just the scenario, the rationale behind it. Knowing what the plant production practices are, what could affect the lot, if you insult that lot, even the process, they take all that into consideration when they're notifying the plant. So it can be a series -- it's going to be the same scenario, but different circumstances.

MR. SCHAD: I would ask has there been any IKE scenarios in that process having to do with fresh ground beef?

MR. GIOGLIO: Not yet. No, not yet. I think the products that were used in those few that have -- the couple that have gone out already I believe one was like a sliced corn beef type product, and the other one was a frankfurter type product. That's not to say that we will not put one out on ground beef, and so forth, to try to deal with some of the problems, and the decision-making there.

MS. CUTSHALL: Dr. Carpenter?

DR. CARPENTER: David Carpenter, Southern Illinois University. I want to follow up on the focus comment that Dr. Hollingsworth made, focus for the agency. As I read the information that you've shared with us, you talk about one-third of the recalls are initiated because of the testing for adulterants. Should we be concerned in terms of expected response to this in the agency that the product that is not tested, one-third of that has, if tested, would be positive for adulterants? And I mean, that would just give you more ammunition to impose this hold procedure to assure that the product going out that you are testing is good. And you can or cannot extrapolate that that may be affecting product that you are not testing also? In other words, is product getting out there that's not being tested also have adulterant in it?

MR. GIOGLIO: I'm not sure that I can work backwards from those products that are in fact recalled, as triggered by our testing. There is not, I guess, it seems to me a correlation between the number of positive samples. I'm not exactly sure I

understand your question.

DR. CARPENTER: Well, you've got data that says, you know, it is positive for adulterant. I mean, what about the ones you don't test? As a consumer, I'm going to make the assumption that the stuff's that not tested is going to have the same proportion of positive adulterants.

MR. GIOGLIO: Look -- yes, Dr. James.

DR. JAMES: Bill James here. As you know, Dr. Masters is Acting Administrator, and so some other folks are rotating through the position of Acting Deputy Administrator. And I'm currently serving that sentence.

(Laughter)

DR. JAMES: The numbers that you cited are accurate insofar as they go. About one-third of the recalls that we've done I believe obviously was a result of the samples that we take. But that's not the same thing. I want to make sure nobody heard this. That's not the same thing as saying one-third of our product is adulterated.

DR. CARPENTER: Right, okay.

DR. JAMES: That's a completely different number. And I don't know off the top of my head, maybe someone else has that number, what proportion of the samples we take result in -- or come back positive, one. And then what proportion of those result in recalls. I don't know. Those are all smaller numbers.

DR. CARPENTER: Right.

DR. JAMES: Now, the final thing I'd like to say is that the sampling that we take is not statistically based. And therefore I don't know how what the samples we take relate to the product as a whole. I don't know what that association would be. So your concerns are acknowledged, but we don't have answers for some of those unknowns.

DR. CARPENTER: So you're saying a card-carrying statistician would tell you you cannot extrapolate the data that you have back to the product as a whole? Is that right?

DR. JAMES: I think there aren't any statisticians with cards who would say that.

DR. CARPENTER: All right, thanks.

MS. CUTSHALL: Dr. Leech?

DR. LEECH: Irene Leech. I just wanted to reinforce the idea of putting your emphasis here on it being something that's good for business. I think one of the major problems with recalls through the years has been people fearing that the negative publicity of a recall would hurt the business. And so if we can really put the focus on helping and trying to avoid this in the first place, I really think that that's the best for everyone involved. And that we made a real mistake by focusing on, you know, the recall is only good for consumers. And I really don't think that's the way the marketplace works. So I hope the committee will put a real emphasis on that.

MS. CUTSHALL: Mr. Finnegan?

MR. FINNEGAN: I agree, Dr. Leech. However, on Page 3 of the draft here, under Raw Materials, especially on O157:H7 Part C talks about buyer identification. That was from the persons who bought from suppliers. Several -- most of the small plants have multiple suppliers. So are you recommending here that if you get a presumptive

positive, that you start doing traceback, and for what purpose?

DR. HARRIS: I guess since your question pertains to the industry guidelines I'll try to address it, if that's okay with you guys.

MR. GIOGLIO: Sure.

DR. HARRIS: What we have seen in the evolution of recalls, particularly with raw ground beef these days, is very much a focus on where did the raw materials come from. And in fact you can assume if you're a raw ground beef manufacturer, if you have a positive, you can pretty well rest assured the agency will be visiting your raw materials suppliers. So for that reason alone, it's very important that if the agency's going to take a sample of your ground beef, it is definitely in your best interest to know which materials suppliers are included in that sample, or potentially included in that sample. Again, because they're going to need to be notified, and they're going to be notified when the agency comes to see them if there's a positive, and it could also affect the scope of your recall. If follow-up with a

particular supplier or a supplier's product shows extensive issues, that may affect other day's production, and not just that day's production, but any other days of production where you included that supplier's raw materials. So that's what that's addressing is that any information a firm can develop and maintain on a day's production, and what supplier's raw materials are in there is going to be most helpful in the event of minimizing the opportunity for recall.

DR. LEECH: So why is the word that's there ?may?? Why not ?should?? May want to develop.

MS. CUTSHALL: Mr. Link?

DR. HARRIS: I can't address individual wordsmithing at this stage.

DR. LEECH: Well, that isn't wordsmithing. I think that's a tone, and that's my question. If somebody just looks at this and hasn't had our conversation, they may come up with a different conclusion then what was presented.

MS. CUTSHALL: I think that's something you can discuss in the subcommittee as well. Mr.

Link?

MR. LINK: I just wanted to follow up a little bit more on that, and kind of follow up on Mark's comment on the IKE scenarios. The IKE scenarios are very helpful to kind of work through issues, and talk about situations with your local inspectors, to address notification. I would suggest if you haven't considered ground beef, you might want to take a look at that. Because recently a notice just came out talking about lotting and sub-lotting, going back through all the materials suppliers. And while we think within our company we've got a pretty solid system, it certainly caused us to pause and take another look, and start asking a lot of questions about particularly with looking at suppliers. And how big did this thing really get. Joe's point. So I just wanted to encourage the agency I guess, along those lines, to consider the IKE scenarios in fresh ground beef sampling, and working back to raw materials suppliers, and just so we can figure out how best to work on the notification to make sure we don't all of a sudden have to find out well we've got to go

find more product because of this same result.

MS. CUTSHALL: Thank you. Last question, Dr. Hollingsworth?

DR. HOLLINGSWORTH: I have two points real quick. One, for the committee in looking if they want to pursue further the idea of economic advantages. One thing I will share with the group is that there is an increase in the number of retail companies that are actually charging their suppliers an additional cost for conducting recalls. Not only just for the cost of the product that gets returned or replaced, but retails have begun to calculate the amount of labor and time, and the disruption of their business that it requires to effectively manage a recall, especially if they're having to -- they do their own effectiveness checks, and they might be looking at two or three hundred stores that they have to actually follow up on a recall. And so there has been a tendency more and more in retailers to charge either a flat fee back to the supplier for each recall, or some of them are actually doing it on a percent of the volume of the product that they're searching for. So that might be

something to consider in your economic analysis.

The other thing I did want to add that, and maybe this falls under this idea of the focus. I think part of the problem in looking at holding product is having the facility clearly understand what product is represented by its sample. And we have seen cases where a company with all good intentions held product that they believed was covered by the sample only to find out after the positive there's a whole bunch of other products now that are included, and their good intentions didn't really achieve the goal, and that is there are other products that now must be recalled. And so they -- I think there's a real difficult situation, particularly the small facilities, in understanding if this is positive, what would you expect me to recall. And I think that's something that the inspectors perhaps could help the plants identify.

MR. GIOGLIO: Right. I think, if I can just comment on that, just very quickly, I think that is in fact part of -- a big focus of both sets of guidelines. As far as the ones that our staff has

developed is -- are trying to educate the plants to the factors that they need to consider in any given situation, if it's a ground beef product as opposed to a ready-to-eat product, what are all the different factors that they need to consider in making that decision about how much product is affected by that -- is represented by that particular sample. Okay? Short of the agency establishing a one-size-fits-all lot definition which we really don't believe is appropriate, or that we can do, you know, with all the various operations there are, and the different factors that come into play at any one plant on any given day. So thank you Jill.

MS. CUTSHALL: Thank you, Mr. Gioglio. We're going to break for lunch. And I would ask you to be back by 1:15. We do have some folks from my staff that can show you where the doors are if you're turned around in here, and you're not sure how to get out. There is, as I mentioned, the cafeteria here. There is a deli downstairs. There's a list of restaurants in the back of your book. And we will be glad to make sure that you can get through security

both going out and coming in. We will see you back at 1:15.

(Whereupon, the foregoing matter went off the record at 11:57 a.m. and went back on the record at 1:24 p.m.).

MS. CUTSHALL: Good afternoon. I hope everyone had a good lunch. I noticed a lot of you stayed in the cafeteria. So that was easy. You didn't have to worry about getting in and out through the security and everything else. I hope the food was acceptable for you. You requested some things this morning, some PowerPoints for this morning's speakers presentations. We have provided those to you, as well as some talking points from the new technology issue, and the FSIS draft guidelines. So you should have all the pieces that you requested. Sheila's handing out to you Dan's PowerPoint presentations. Hopefully we don't have the problem with the skylight that we had this morning, but just in case, you've got the PowerPoint, so you can follow as you go through.

Dr. Engeljohn is going to talk to you about the third issue today, and that's how can risk-

based sampling most effectively be conducted in small and very small plants. And I'd like to introduce Dr. Daniel Engeljohn, who is the Deputy Assistant Administrator in the Office of Policy, Program, and Employee Development. He oversees the risk management activities associated with meat, poultry, and processed egg products. He manages the staffs that develop regulations and policies associated with inspection procedures, data analyses, and performance standards strategies. Dr. Engeljohn has worked at USDA for 24 years. He also serves as Adjunct Assistant Professor of Nutrition on the Graduate Faculty at Howard University. He teaches both undergraduate and graduate courses on human nutrition. Dr. Engeljohn holds a B.S. and M.S. degrees in Animal Science from the University of Illinois, and a Ph.D. in Nutrition from Howard University in Washington, D.C. Please welcome Dr. Engeljohn.

(Applause)

DR. ENGELJOHN: Thank you very much for the opportunity to meet with you today and get your input on how we can move forward with what we consider

to be a very important strategy for our risk management of pathogens in the meat, poultry, and egg products that we regulate.

Each of you have in your binder a copy of the actual questions, the issue paper that I'm putting forward. I have as well a PowerPoint presentation that I'm going to walk through that gives some additional information with a perspective on the FSIS regulatory testing programs in order to give the group that's going to be dealing with risk-based sampling a broader perspective of the issues that we're going to hopefully get some guidance from you on today.

To prepare for this presentation, Heather Quesenberry, who is sitting back here as well will serve as a resource to the group in terms of answering questions. Heather is primarily responsible for the risk assessment activities, and the design of the risk-based verification program that we're using for Listeria. So she offers the group some considerable experience, and will be a great resource to us.

To remind the committee that FSIS is the public health regulatory agency within USDA, and that

we ensure that the nation's commercial supply of meat, poultry, and processed egg products are in fact not adulterated or misbranded. For purposes of our considerations about risk-based verification activities by the agency, I do want to point out this last bullet, which says that the FSIS authorizing authorities, the Federal Meat Inspection Act, the Poultry Products Inspection Act, and the Egg Products Inspection Acts do not bind the agency to activities that are strictly inside the federally inspected facilities. This is in fact the authorities that we also use in our activities we do in distribution, at warehousing, and in retail. And this also is an area that can be considered in terms of our risk-based approach for the future. So I'd like the committee to specifically be thinking about that aspect as well.

The third slide that you have is a general overview of the salmonella data that the agency has. And I'm going to be presenting to you the most currently available information that the agency has made available on its regulatory testing programs, just to give you some perspective about the breadth of

the issues that we're going to be dealing with in terms of answering the questions. This gives you an overview about the salmonella and the raw classes of products that we regulate. In particular, you can see what our national baseline was for each of these classes, as well as where we stand with the pathogen reduction HACCP verification tests as of calendar year 2003, with an overview of the years since we began in 1998, and then with the note at the bottom saying that in calendar year 2003 we began seeing a rise in three classes of poultry. And so specifically looking at this data to see that we in fact do track what the progress is on our verification testing program, and how we might want to tailor or target our resources, possibly at classes of products that may present greater exposure of pathogens to humans.

With regards to salmonella in ready-to-eat products, I've listed here both for the ready-to-eat meat and poultry products, as well as the information related to processed egg products. As you may know, for the pasteurized egg products they are all expected to be free of salmonella. The information presented

here is for salmonella in the meat, poultry, and egg products. You'll also specifically note that in Category A for the meat and poultry products, which is the not-heat-treated shelf stable products is one for which the percent positives does appear to be higher than some of the other classes. So again, in terms of focus by the committee, the agency looks at where is it that we have possibly greater non-compliance, and how can we in fact effect change by focusing on those particular categories. The same is true for the various types of processed egg products that we have. There is a difference in terms of the non-compliance rate within the classes of products.

For Listeria monocytogenes, this information is for calendar year 2001 - 2002, giving a summary of the non-compliance rate in terms of percent positives of Listeria in ready-to-eat products. Again, there are differences within the types of products. Category A being the not-heat-treated shelf stable products. So this is one way that our HACCP program regulations break out the various types of products. So we've listed them this way just to give

you a perspective as to the different ways that we would look at data available to us. For E. coli O157:H7, the percent positives in raw ground beef is what we have information released on for calendar years 2003 - 2004. We've broken it out by federal plants, retail stores, state plants, and imports, giving an overview of the percent positives. And again, in terms of a risk-based program, the agency is looking at where in the system can we effect a change by our verification activities that may in fact have some direct impact on public health. As you heard this morning, we don't have the best available attribution data, but the agency is working from the perspective that a decrease in exposure of pathogens to humans is one way that we believe there to be an impact on public health. And so that's the perspective that we work from when we collect this type of information to help focus our inspection resources.

This particular slide is one for which we presented to our state program directors in terms of trying to give them some overview of the agency's

program. And this slide by no means provides a formula as to how the agency conducts its programs. This slide was put together with information that was available a year ago to just give an overview as to if in fact the agency or a state program was to schedule testing, what is it that the federal program is accomplishing. And so this presents an overview of four different types of verification programs, one being raw ground beef, ready-to-eat Listeria, and salmonella product testing, salmonella and raw products and egg products. Breaks it out by the number of tests that we were taking in the past annually. So the 5,000 samples for raw ground beef represents taking 5,000 or projecting to take 5,000 tests annually. That's what that number is. 6,600 represents how may ready-to-eat tests we were taking for Listeria and salmonella.

The number of establishments represents the number of federal establishments that produce products that fall into these categories. The average number of establishments tested per year breaks out to roughly three times a year for ground beef, for the

ready-to-eat products, for Listeria and salmonella. One sample set for salmonella, a year is what the projection sort of plays out for salmonella. For egg products you'll see that there is a likelihood of being tested 20 times a year. This just happens to be the data that the agency had available to us.

And then we broke it out just so you can get an idea of the number of shifts that we believe this impacts by the number of plants operating throughout the year. So it sort of gives you an idea that the rate per shift in terms of testing. So this gives you an idea of what the testing program has accomplished in years past. The goal of the agency is to better define, in fact, how we will target our resources such that we will have a plan on where we are going to use our verification resources for testing in the future. So this represents the idea of having a certain number of tests, a certain number of plants producing the product, and then that working out to how many times the test is done. Our goal for the future will be to have some risk-based policy driving this such that it is in fact targeted at

higher risk operations. So again, this is what has been done in the past. We're looking to move to something more structured.

Why risk-based verification testing? And I hope to answer that by this slide which says that historically our microbiological sampling was just randomly scheduled, without any preconceived direction as to who gets sampled, for the most part. It was just a random sample that if you produced a product, your likelihood was to be put in the population of plants, and then randomly you would be scheduled. Now, with public health protection as a primary mission of the agency, we're driving to ensure that we have a more effective use of our inspection resources so that we have a measurable impact on public health. We're focusing today on the verification testing program. I would like to point out too, just so you know, when we talk about verification in the agency, we're talking about looking at the execution of the food safety systems as well. So that's a records review, that's an observational activity, that's the daily activity that our inspection force does conduct

as verification as well. But this focus will be on the actual sampling of the product, which is an adjunct, or a supplement to the regular verification activities.

We want to target those products most likely to result in illness. This helps amplify the effect. It focuses as well upon our follow-up activity. Right now we have focused activities that if there's a positive in an FSIS sample, the establishment is required through HACCP regulations to conduct corrective action so that this particular problem does not recur, and that they have rational basis for what they've done to correct that. And then at that point the agency comes in and verifies the follow-up activity. We also can have risk-based activity associated with that particular aspect.

We're also intending to use and are using with the Listeria model the risk assessment model that has been already reviewed. It's been peer reviewed. It's been modified to address the specific factors that we want to use for risk-based programming. But again, we're using an actual risk-based model to help

define for us what we believe to be the public health protections afforded by various options in terms of risk management strategies. And by using a model that is in fact targeting activities, it's agile. We can change it based on new information, which is what we intend to do as we collect more information, particularly on those factors that may in fact affect the outcome, and we can adjust our model to adjust the rate at which we sample as well as who we sample.

What makes one ready-to-eat product or plant more risky than another? I'm speaking in terms of Listeria because that's where we have a defined risk-based activity underway right now. With regards to Listeria, this addresses specifically the alternative that is selected by the establishment. And the alternatives were identified through our 2003 Listeria risk assessment model. And I'll walk through those particular options in the next slide. But other factors deal with the product type. And that would be does the product, for Listeria anyway, have the potential for Listeria to grow? And if so, that presents a greater risk. And that is in fact defined

and measurable in terms of a relative risk by the risk assessment model that we did use.

The compliance history of the establishment. This could be both by the agency's collected information as well as any other information that's available to the agency with regard to the operation of the establishment.

And production volume. And I point out here that we use production volume presently because we look at it as one means of exposure. A plant producing more product that's in non-compliance may likely present a greater risk to public health. But I would also point out that the agency is specifically interested in addressing the needs and special considerations of small plants. And the volume category does in fact specifically get at the issue of a small plant. And so that's why it's important to us to know how much product is produced. We have some small plants defined by the HACCP rule, which is fewer than 500 employees, that are producing more product than some of the largest plants that are the larger plants classified in HACCP. So we decided some time

ago that the HACCP category was not the most prudent way to segregate out establishments, but production volume may be. We're looking to this committee to provide us additional information that may in fact help us refine that, or give us more information to support on that particular issue.

And then the validation of the controls. And as we all know, HACCP was designed to be a preventative measure. It's a structural way to address food safety hazards within the operations. But it does matter whether or not there's a rational basis for what the establishments are doing. And I would say that the agency is in fact going to be taking a closer look at validation in the future. Since we've already put in place the fact that we've gone through the basic phase of HACCP implementation of ensuring that everyone has a program, and that it's being executed as written, the next phase that I think we should be looking at from a risk management perspective is is the rational basis, the scientific justification, actually being generated to support those programs. So that may in fact have a principal

impact on the risk in terms of what's being produced in an operation.

For Listeria, then, just to get at some of the specifics, we have our final rule that issued in October in 2003. It did put in place some very specific and explicit requirements upon establishments to address Listeria control, and did in fact provide three alternatives that the establishments themselves could select from in terms of controlling the hazard. The three alternatives are not equal in terms of protection. That we understand to be the case. We knew that when we developed the rule. But we also developed it with the idea that not everyone could have the most effective control, but they could in fact put in place controls that would produce safe product. Alternative 3 being the one that has the least level of control, meaning that only sanitation is the primary means by which Listeria could be controlled. As an agency, we do in fact believe that Listeria is a controllable hazard, and that appropriate sanitation can in fact appropriately address that particular hazard.

This slide is not intended to be overwhelming, but it gives you an idea of the considerations that our risk assessors went through in terms of designing our risk-based verification program. We really broke out the alternatives into four areas, as opposed to three alternatives. Alternative 1 was the alternative in which both a post-lethality treatment and an antimicrobial growth inhibitor was added to the operation. So we consider that to be one level of control. But for Alternative 2, an establishment could select to have either a post-lethality treatment or an antimicrobial growth inhibitor. And we believe that we need to look at those two separately. And it is the belief of the agency at the moment that the post-lethality treatments are in fact one for which there is a limited amount of technology available, but there is in fact technology available to small plants on this particular issue. But it's the antimicrobial growth inhibitors that it actually is quite easy to add to the product. It may in fact have some effect on the organoleptic qualities. But it's also the one for

which it's critical that this program be supported in terms of the level of addition of the antimicrobial being effective. And so we believe we needed to break out this particular option and look at it as a separable issue for which we would consider how frequently we would target. And then Alternative 3 again being the one for which if sanitation alone is the control measure within the operation. So these are the four stratifications that we have in terms of breaking out. Then we have additional stratifications again going by what the plant is actually doing.

And I would just point out that as a part of the regulation for the first time, we actually require the establishments to provide to the agency on an annual basis specific information that answers the questions about some of these risk factors. What products are being produced, how much is being produced, at what level of control is being implemented by the establishment. And we require that to be submitted to the agency. We now are taking that information. We have plugged it into our risk model, and that information is in fact what's driving the

frequency by which a plant may be selected. That's just in our first phase of how we're constructing this program.

For consideration by the committee, then, we're looking at expanding our program beyond Listeria, and in fact making it more effective with regards to Listeria. But what we need to know are what are the definitive drivers of risk, those risk factors that have to be identified and ultimately understood quantitatively. We need valid descriptions from the establishments as to what they're doing to address those risk factors. And again, the agency has access to look at that information when we conduct our inspection activities, but if in fact we want that information provided to the agency, we either collect it ourselves by our inspectors making judgments about that, or we go through the process of getting OMB approval to require you to submit it to us on a form. And we believe that the accurate information coming from the establishment is in fact the preferred way that we would prefer to handle this particular issue.

We want to have a global model, one that

tracks all pathogens and processes to help us to deal with more than just one particular pathogen, or hazard at a time, so that we are looking holistically at a systems approach as opposed to just one pathogen at a time approach. And meanwhile, we're using a mechanistic model for each pathogen and process as we move along.

For O157:H7, there are some specific issues here for which the agency is seeking information, and for things that we have done with the industry. We did require the establishments to reassess their HACCP plans back in October of 2002. We know that effective sanitary dressing procedures coupled with disposition CCPs, which is one thing that the industry did where they sort product. They have in fact put in place effective sanitary controls, and then they have highly effective verification testing programs themselves such that they have high confidence that if there's low-level contamination they can find it and divert that product to ready-to-eat. We do think that that has had an extraordinary impact on the prevalence of O157:H7 that we're finding

in our verification program, and is specifically reflected in the reduction in human illnesses. So we think that the industry themselves have taken these types of steps, and the agency needs to look at how to recognize effective control measures in the design of our risk-based programming. From a risk management perspective, having the establishments tell us what they're doing is one thing, but we do feel we need to have that extra layer of verifying that they're actually accomplishing what they say they're doing as a second level of consideration.

The question specifically that we would like this committee to consider and give us feedback on at your meeting today and tomorrow are ?Are any risk factors FSIS presently uses in designing risk-based sampling more important when addressing the concerns of small and very small plants?? Number 2, ?Are there additional factors unique to small and very small plants that FSIS should consider in the design of risk-based sampling?? And Number 3, ?How can FSIS conduct risk-based sampling more effectively in small and very small plants?? The fourth question then gets

at the issue of expanding beyond where we are today, which is, ?What are examples of the unique business practices of small and very small plants that should be considered when designing and implementing risk-based sampling for E. coli O157:H7 and raw beef manufacturing trimmings and ground beef, for salmonella and raw livestock in poultry products, for Listeria monocytogenes in post-lethality exposed ready-to-eat product, and in salmonella in pasteurized egg products??

One thing that I failed to mention to you in the focus that we have on small and very small plants again is that our small and very small plants represent the majority of the establishments that we do inspect, so we have a larger number of small and very small plants producing product. I'll give you roughly the estimate that we have, 80 percent of the establishments are producing less than 20 percent of the product. So you sort of look at it that way. So we need to take into account the fact that we have a large number of plants producing a smaller amount of product, but still, when we're looking at public

health, we are in fact looking at the effect of our program in the federal program, the effect of the state programs that have to be equal to that are producing meat, poultry, and egg products, and the effect of the international programs that are sending product here in systems that are equivalent to ours. So it's all those things into consideration when we design our risk-based programs. But for small and very small plants in particular, I would point out that we do have additional regulatory and statutory requirements that we have to take into account in terms of ensuring that we don't disproportionately impact that industry. At the same time, our laws require that the food be safe, and that we ensure that we do that in a way that is best reflective of a risk-based program.

Those are the questions. I hope I've provided you some additional background material for you to consider in terms of trying to answer the questions today. Myself and Heather will be available in the breakout room to record the information, and to specifically answer and guide the discussion as you

make your considerations. And we've provided you here our contact information for follow-up if in fact you have follow-up questions after you leave the meeting. So Mary, is the next step answering questions?

MS. CUTSHALL: Yes, it is Dan. Can you all hear me? I'm not sure. Looks like we have Dr. Leech has a question.

DR. LEECH: Thank you. I guess mine is almost more -- since I'm not on that subcommittee, a reminder that one of the last things I heard was saying that we've got to balance the need for food safety with the need for keeping the company in business. We don't want to make it cost so much they don't go in business. But a small company could be particularly vulnerable to losing business if there is an outbreak. So protecting them means that they're not going to have as much reserves. So I think we need to think about the fact that what's good business sense is also good consumer sense, and if we separate them we've got a real problem. So I'm uncomfortable hearing you say that we've got to balance what's going on in the business piece with our requirements for

food safety.

DR. ENGELJOHN: Okay. And I would just clarify, I did not mean to imply that the business survivability weighs out over food safety. But the issue becomes one of having a balance in terms of risk management options that get at the issue of being protective of public health. And that there are in fact special needs, we believe, with the small and very small plants that need to be taken into account. And that can be handled in part by, just as some ways that the agency does in fact provide what we consider to be helpful information to the businesses, is that rather than them having to do validation studies, and invest the resources in some of the more scientific aspects that are costly, is that the agency has technical experts who can in fact pull together that information. We can summarize it, and provide that information to the plant such that our compliance guides in fact substitute for the validation, which says if you follow these procedures which we believe a plant, a small plant in particular, would be capable of following with the resources that they have, it

would result in safe product. Then the obligation would be that the plant then simply needs to validate that they can execute that information. So that rather than them investing those resources at a cost to them, the agency has the capacity, and we believe the absolute responsibility to take the expertise that we have and provide that information. So it isn't intended to provide a differing level of outputs from one plant because of size. It's to provide them resources so that they can remain viable within the regulatory requirements that we have. So I hope I've clarified that a bit.

MS. CUTSHALL: Mr. Schad?

MR. SCHAD: Mark Schad, Schad Meats. I'm going to speak from the perspective of a very small plant operator. And I'm going to use the LM rule as an example. When you talked about different risk-based samplings, and different ways of looking at it, Alternative 3 has always been looked at as the riskiest process. And I think you need to look at that more on a plant-by-plant basis. Is Alternative 3 necessarily the riskiest process. I think that really

depends upon the plant. I know the advantage of having a very small plant is the amount of control you have. In my case, I only have five employees, so I know them all very well. The processing area is very small. And it can also be driven by market forces. You might be willing to choose Alternative 2 and use lactates or diacetates, but yet a very small plant, he's looking for a niche because he cannot compete with the big guys, because that's just the way it is. That's not a complaint, I'm just saying that's the way it is. So he's going to say, well I'm going to choose Alternative 3 so I don't list those things on my agreement statement.

And it's kind of a question or a consideration I guess I'm going to put out to the subcommittee. It's like say you have a plant that's chosen Alternative 3, and has always for years been getting negatives for LM, as opposed to -- and these are just hypothetical cases. The plant that chooses Alternative 2 and from time to time has a problem with LM. Which really is the riskiest process?

DR. ENGELJOHN: Well, I would answer it by

saying when we look at the science, the Alternative 3 does present greater relative risk from the perspective that you don't have the two components that we know would drive down the risk beyond sanitation, and that would be a post-lethality treatment that would kill any organism that gets on the product after it's exposed, or the antimicrobial that's applied in an effective means to keep it from growing if it's there at very lot levels but not detectable. So from a science perspective, Alternative 3 does present a greater risk.

But I would agree with you that in a program -- in an operation that has in fact an effective sanitation program can produce product that is in fact safe. We know that that is achievable, and we know that there are differing degrees of how much control you exert. And that's something that we expect you to have identified in your program. Our goal, ultimately, is to recognize differences in a program, and Alternative 3 is an example, who has exceeded beyond what we would expect to be good manufacturing practice, in essence gone beyond the

level of monitoring and verification themselves to demonstrate that they have the program under control. And we would like to be able to recognize that using your data, as well as the controls you have in place and justified in your program. But the issue becomes one of you having that information available and justified. And we think that's achievable.

We would not have identified sanitation as an option if we didn't believe that it could be effective. We do think it can be effective, but I would just give the example that testing product once a quarter or once a year doesn't provide the level of confidence that you can ensure that you have that process under control at all times. There are other ways that you can demonstrate that you have greater control.

MS. CUTSHALL: Dr. Hollingsworth?

DR. HOLLINGSWORTH: Dan, could you just help me on the numbers again. If you could quickly go over the total number of federally inspected plants, what percent of those meet your definition of small/very small? I know we keep coming back over

that.

DR. ENGELJOHN: Yes, but this one does not break out small/large/very small. Is this the one you're talking about?

DR. HOLLINGSWORTH: No.

DR. ENGELJOHN: Oh, I'm sorry.

DR. HOLLINGSWORTH: You mentioned it in your conversation.

DR. ENGELJOHN: Okay.

DR. HOLLINGSWORTH: And I think we've had some previous presenters where they talked about it. My concern is I'm getting all these different numbers and trying to get the percentages. So in general, FSIS has under federal inspection about 9,000 or 7,000 plants?

DR. MASTERS: 6,300.

DR. HOLLINGSWORTH: 6,300? And according to the HACCP definition of small and very small, did I hear 80 percent of those meet that definition?

DR. ENGELJOHN: I used that as a general number. It depends on which product. Ground beef is different than what raw poultry would be. So the

numbers vary. But I think just a general number, if I was to break out things, is that we have a very small number of large plants. And the rest fall into the small and very small categories.

DR. HOLLINGSWORTH: And did you also say what percent of the product is produced by them?

DR. ENGELJOHN: And again, I used the number 80/20, 80 percent of the establishments produce 20 percent of the product. And that's a general number. You know, if I was to give you that number for ground beef specifically it would probably be 95 percent of the establishments produce 5 percent of the product. Something like that. So it depends on the product. But a general number, just to give you an idea that there are in fact more small and very small plants than there are large plants, and the large plants, depending on the product, generally produce more product but with fewer establishments. So I meant that to be just a very general number.

DR. HOLLINGSWORTH: Okay. And the reason I asked, and maybe this is more for a discussion at the breakout session, but it seems to me, and I'm

assuming the agency is then defining risk using sort of the generic formula of to determine risk you look at what is the potential for exposure, and then what is the outcome if you are exposed. And therefore, that would -- in that case I think it's important to that committee to understand the volume of product. Because that automatically is going to lower your risk if you look at potential for exposure.

DR. ENGELJOHN: Do you want to offer something more? If you do, Heather, could you maybe come up or get by a microphone?

MS. QUESENBERRY: Let me just tell you, we will go into great detail about that in the breakout session.

DR. HOLLINGSWORTH: Okay, great.

MS. QUESENBERRY: Let me just tell you very quickly right now how long this background is. The diagram that Dr. Engeljohn showed you of the four alternatives, two A, two B. That sort of grows from a main thread. That's the primary driver. And within each of those alternatives you have secondary factors, which would be more of the nest adjusters. So a good

example to understand the bottom one would be two establishments who produce a product with the same kind of characteristics. Let's say that they both produce a frankfurter product. Same kind of shelf life, same kind of cage, same water activity, etcetera. But one of them has a volume that's 100 times greater than the other. In our risk ranking, therefore, our sampling frequency, the larger volume establishment would be sampled as much for every particular frequency than the small one. That's because the other risk factors, the primary drivers of risk, primarily alternative, secondarily does this product involve -- That's how -- is factored in. That is the scale of exposure.

DR. HOLLINGSWORTH: Thank you.

MS. CUTSHALL: Mr. Kowalcyk?

MR. KOWALCYK: Yes, Michael Kowalcyk. I guess this kind of follows Dr. Hollingsworth's question a little bit. Can you share with the committee some more insight into these dynamic risk assessment models? Heather's description kind of acts as a scorecard to rank establishments by relative

risk. It would help me to look a little deeper into how that model works, how often it's updated, what data is fed into it, and how the issues you're posing to the subcommittee regarding small establishments and very small establishments, what factors are you looking for, assuming you want to improve the model, to apply it to those types of establishments? So I'm kind of trying to connect the dots here as to how that applies to the model that you're using.

DR. ENGELJOHN: All right. It's an excellent question, and would have been helpful to have more information on that. But I would point out that the agency only started using its dynamic risk-based model for Listeria in January. And we're just now getting it developed so that it is in fact being used to be modified and updated. So we're at the very beginning stages of how we are in fact using that model.

I would say that the agency's goal is to as soon as we have something that we can make available for peer review we certainly intend to do that. But I would also say the agency has a strong

desire to make more transparent how the process works, and would likely do so in a public meeting sometime yet in the near future, in the very near future. So that the industry itself knows how it works, and what the risk factors are, as well as the consumer groups and others how have an interest in knowing how in fact the agency is using its resources. So it's not at a point yet to where we can actually share that with you. We can give you the broad design features of it, but we don't actually have those answers yet because we are just now developing it.

MS. CUTSHALL: Ms. Eskin?

MS. ESKIN: I just need a clarification. Dan, you said at the end of your presentation that the laws require -- again, excuse me if I'm misquoting you -- the laws require that small businesses not be disproportionately impacted. Could you elaborate on that a little bit?

DR. ENGELJOHN: Yes. For the policies that the agency has, as well as any federal agency, we have to deal in our rulemaking activities, we generally always have a section in there that deals

with a 12866 review, which in essence is a review of the impact upon businesses, and in particular on small business. So the issue becomes one for which the agency has to define how it selected its options in terms of risk/benefit, and most specifically in terms of disproportionate impact. The disproportionate impact also is something for which the agency has to provide an analysis of how it's dealt with the issue of minority businesses as well, which oftentimes is small business, to ensure that there isn't a disproportionate impact in terms of impact on the industry or in fact on the consumers who in fact may be receiving a product. So we deal with it from the perspective of small business.

MS. ESKIN: Through the rulemaking, and its executive orders, and other statutes.

DR. ENGELJOHN: That's right. And so for many of our programs, ultimately the entire process, and Listeria being one for which we identified that we in fact were going to devise a risk-based program. And we identified in the preamble to the final rule how we intended to make this program particularly

work. And we identified for risk-based considerations we would in fact be looking at Alternative 1 being the one for which we would provide the least -- or a lower level of direct oversight than Alternative 2 and Alternative 3, again, based on the fact that we do believe that there are definable relative risk outcomes that are different.

And we did make known that in order to address the issue of small business impact, that we would in fact be looking at and ensuring that we're taking into account small business. And we did that by saying we would provide guidance to the industry. We would help in other ways.

MS. ESKIN: Technical support.

DR. ENGELJOHN: Yes. And this committee can actually provide us additional input. If you have some that would be helpful to us, to further address those specific needs.

MS. CUTSHALL: Dr. Harris?

DR. HARRIS: Real brief comment and then a question. First, when you look at this risk assessment relative to assigning risk, I'm glad to see

that you're focusing more on product volume than the traditional small/very small/large categorization. I was in a facility about two weeks ago producing ready-to-eat sausage that had 15 employees, but they were manufacturing 8,000 pounds an hour of ready-to-eat sausage. So I think volume is a much more appropriate way of considering risk in those situations. Those of you that are shaking your head, they've invested about $4 million in an automated system. It doesn't take very many people, but it's a really cool system.

The question that I had, though, was a lot of the data that you showed, the most recent data shown is 2002. Is there not anything more current than that?

DR. ENGELJOHN: Not that the agency has made available, and I would think that our intention is to make information more available. But in terms of the direction on the salmonella, I don't think you should expect there to be an improvement.

MS. CUTSHALL: Dr. Carpenter?

DR. CARPENTER: David Carpenter, Southern Illinois University. It's kind of a curious question.

Your Slide 8 says historically you've used random sampling. And now you've got to use your resources more effectively and target products that are most likely to result in illness. Is your decision on what should be targeted based on the data that were generated by random sampling, telling you in fact of all the universe of things we've tested, here are the things that apparently are going to have the highest risk?

DR. ENGELJOHN: Yes. I would say the agency has a definitive need and a desire to use historical data, both our own data as well as the data the plants would have in some fashion. So yes, historical data would be part of that equation.

MS. CUTSHALL: Mr. Govro?

MR. GOVRO: Mike Govro, Oregon. Now that you have identified firms into each of these three categories, will you be developing data that will be statistically valid and quantify the actual differences in risk between the different types of alternatives used? And if so, when will that data become available?

DR. ENGELJOHN: Heather, could I get you to come up to the microphone there?

MS. QUESENBERRY: The short answer to that is yes. I can elaborate on that in the breakout session for you. And to follow up with what Dr. Engeljohn said before, we're in preparation for a peer review. So I would estimate in the fall that information would be available to the public.

MS. CUTSHALL: Dr. Hollingsworth?

DR. HOLLINGSWORTH: I have to think my question might be the same as Michael's, but I'll ask and we'll see. The three alternatives, and I understand intuitively it's based on if you're treating something for a pathogen, and you're just cleaning the environment, you would think the treatment is going to reduce the risk for them. So I understand intuitively where your alternatives are seen as from the highest to the least amount of risk. But I'm wondering in the Listeria sampling that has been done either by the plants or by the agency, have you seen or do you have any numbers to reflect whether in fact there is or is not correlation to the

alternatives, and the findings of positive Listeria samples?

And I tried to look at that myself, and what I realized is I was trying to look at recall data which isn't working because the recalls are small plants that aren't holding. They're making lots of positives that we never know about because it's under testing hold. So I'm wondering if there are any current data that would establish whether or not one alternative is truly in fact lowering risk?

DR. ENGELJOHN: I would say at the moment no, we don't have that data specifically available. But I would just caution to say that the one slide I had on here about validation I think is extraordinarily relevant. And I would say we are aware of some study, IKE study in particular, that's being done of product at retail, in which the product all is labeled as having antimicrobials added to it, that are there specifically to inhibit growth of Listeria. There isn't a decrease in the quantitative level of Listeria in those products, which would lead us to believe that the validation for the effective

use of those treatments may in fact not be up to where it needs to be.

And that is in fact one of the features of the next phase of the agency's verification program in which we are in fact going to be looking at the data that supports the actual intervention being used, both in terms of is it real data or is it modeling data, as an example, which would help provide some clarity. Is the data respective of the shelf life of the product. So that would get at part of that issue as well. So I would say at the moment the agency does not have great confidence that there is in fact a level of validation that needs to be done in those plants in terms of what's on file and demonstrated in the programs. And so we're not treating, at the moment, plants differently based on the type of alternative, I would say Alternative 2 particularly where there is an antimicrobial agent. They are in fact being sampled at a rather high frequency, in part to get at the issue of we needed to collect some information there on those particular operations.

Our next phase, though, will be looking

at, again, looking at the validation in the support documentation, and then as well the agency has traditionally only looked at product for Listeria. And I would tell you and the industry that our intention is to begin as quickly as we have our employees trained to collect product contact surface samples and environmental samples, that would become a routine part of our verification testing program. So that in particular for Alternative 3 where sanitation is in fact the issue for which needs to be controlled, we're not just looking at product, but we're actually looking at product contact surfaces in a routine manner. And so again, driving our risk-based program to get at the issue. We've not looked at product contact surfaces and the environment before. That will in fact be a factored in part of the next phase of our program.

DR. HOLLINGSWORTH: And Dan just for clarification, did I just understand you to say that currently FSIS's sampling for product is not driven by the alternatives that are in place?

DR. ENGELJOHN: I should clarify. It is.

There is a distinction made between Alternative 1 and Alternative 2 and Alternative 3, but there is a high level of testing being done in those. Did either of you want to clarify that any further? We are in fact testing Alternative 1, but not at the same rate that we're doing Alternative 2 or Alternative 3.

DR. HOLLINGSWORTH: So the sampling is based on the alternatives?

DR. ENGELJOHN: In part of what the establishment has provided to us. That's one piece of the factor. The data provided by the industry on the form, where we collected that information, is in fact the driver for the frequency of testing. So based on alternative, there is a distinction, but all plants are being tested at a much higher frequency than they ever have in the past.

MS. CUTSHALL: Mr. Govro?

MR. GOVRO: Just a question again about the frequency. In your slide it looks like Number 7 here, risk management. And I just want to make sure that I'm understanding this chart correctly. In the raw ground beef and the ready-to-eat for Listeria and

salmonella, we're looking at fewer than three samples per year per establishment?

DR. ENGELJOHN: That was -- this is information just taken very broadly in terms of the entire program for two years ago. This is the data from two years ago. In order to get an idea of how frequently an establishment may expect to be tested in just routine testing, this is in fact what the data, the raw data, would play out to be. This doesn't reflect now what we're doing with regards to Listeria.

MR. GOVRO: Can you share with us how frequently you're testing now, or is that?

DR. ENGELJOHN: I cannot because at -- you'll see here for Listeria as an example, is 6,600 samples. We have in fact made the determination to increase that number of tests, so the overall number of tests has increased. And at the moment, there is no defined level of frequency that we're testing. In fact, we have a certain number of tests that we are able to do each week. We schedule on a weekly basis. And we're doing as many as we can now, gathering the information before we go to the next phase, which at

that time we do intend to have some estimate of how frequently an establishment should expect to be tested based on its relative risk.

And again, that's what we committed to say in the final rule preamble. We did say each year we expect to provide a listing of how many tests we expect to take in our general risk-based program, and how frequently an establishment could expect to fall into that category each year, depending on the level of risk. So the goal is to be able to define these features and provide on a yearly basis some idea of where we're going to be putting our focus. We don't yet have that devised.

MS. CUTSHALL: Mr. Kowalcyk?

MR. KOWALCYK: To follow that, the frequency of testing, has the agency discussed, once you did roll out with this risk-based model to prioritize your resources, to still retain some level of random sampling as an additional validation to what you're doing with the risk assessment model?

DR. ENGELJOHN: Absolutely. There will, I hope, always be some just general testing at random of

all products. And in fact, the Listeria program today does have an all ready-to-eat category where it doesn't matter what you produce, or what type of product it is, the inspector is just told to select a sample of ready-to-eat products so that we have some general ongoing basis.

The agency also needs to get at the issue of ongoing baselines in order to establish true prevalence, which is a statistically designed program. And so we still intend to do baselines, which are statistically driven, to give us true prevalence, versus regulatory compliance, which we view as something different. So we do have a need to have all those kind of programs in place. But again, we are focusing on testing today because that's an area of tremendous resources for the agency, but it provides us with some important information to help drive us to look more intensely at the operation itself. So testing alone isn't our only resource to get at the issue of how well the establishment is controlling its program.

MS. CUTSHALL: Thank you, Dr. Engeljohn.

DR. ENGELJOHN: Is that it?

MS. CUTSHALL: That's it.

DR. ENGELJOHN: All right, thank you.

MS. CUTSHALL: We have provided time for public comment at this juncture. We have not had anyone sign up for public comment. And before we go to the closing remarks from Dr. Bill James, standing in for Dr. Masters, I'd just like to say a few things about the breakout rooms. I think on your agenda you all see that the Standing Subcommittee Number 1 will be in this room. Standing Subcommittee Number 2 will be in Room 1160. Standing Subcommittee Number 3 will be in Room 0161. I know most of you are going, oh my gosh, where the heck are these rooms. In order to make sure that you do find your room, I have folks from my staff that are here that will escort you to your breakout rooms. And we will make sure that you have the equipment that you need, that things are set up. We have provided for a break. I know we were not scheduled to begin the breakout sessions until 3:00. So once we have our closing remarks from Dr. James you can take a break and I will make sure that I have my

folks here at five minutes till 3:00, and we will be able to escort you to your breakout rooms. So that gives you a little bit of a chance for a break before you get started on your deliberations.

DR. LEECH: Could we make the break more like 15 minutes at least?

MS. CUTSHALL: If that's what you want to do then we can certainly do that. Absolutely. Fifteen minutes it is. And now I'd like to introduce Dr. James for the closing remarks.

DR. JAMES: Thank you, Mary. I like that attitude. That has been a hallmark I think of this committee over the years is that you like to get at your work. And I know these subcommittees often work fairly late into the evening. Just wanted to extend on behalf of the agency our thanks for your willingness to serve on this committee. As was mentioned this morning, we know that you're not getting rich from this. So the work that you're doing has been very important to us over the years. It has influenced the decisions that the agency has made. Your opinions and ideas have found their ways into our

notices, our directives, our regulations. So the work that you're doing is very important. We very much appreciate everything that you bring to the group, and that needs to be expressed publicly. So, in order not to cramp your break too much, as you decided 2:30 was the best time to start, I will close. And again, thank you very much. Look forward to meeting with you all late tomorrow.

MS. CUTSHALL: Thank you, Dr. James. And we will see you back here at 2:30. We appreciate that. Just want to remind you that we do start at 8:30 in the morning, and we will be in this room, so you can leave -- the cafeteria will be locked up later this evening so you can leave your books and things here overnight. Thank you all.

(Whereupon, the proceedings in the foregoing matter went off the record at 2:20 p.m. and went back on the record at 2:43 p.m.)

CHAIRPERSON ELFERING: Well, I think we've got a couple of things that we need to discuss, and, you know, one of the things that probably sometimes

works out the best is just to kind of go over some of the issues at hand and, really, what they're trying to accomplish.

I think one of the difficulties that FSIS has had in the past is disseminating information out to very small plants, and I'm going to say very small more so than small plants. If you look at the definition of what a small plant is, in most people's mind that really is not a very small plant.

Very small plants are the biggest issue. One of the things is -- and they've tried a lot of -- a lot of different things to try to get information out -- having workshops. But many times in these very small plants the owner of the processing plant is also the sausage maker of the plant, is also the sanitation person in the plant, and is also the salesperson in the plant.

MEMBER LEECH: And it might not even be a full-time job.

CHAIRPERSON ELFERING: That's exactly right.

MEMBER LEECH: It's more a hobby on the

side.

CHAIRPERSON ELFERING: Yes. So for them to be able to go to a seminar, and especially like if you would want to be putting together a two-day seminar --

MEMBER LEECH: It's not going to happen.

CHAIRPERSON ELFERING: -- yes, you're just not going to be able to get people there. We have even -- in our state, we have tried to hold what we called a HACCP roundtable, where we would invite the industry to come in and discuss issues with HACCP, and the only participants that we ever had were companies like Hormel, Jenyaw, the large -- who has quality control people that can come to a meeting. So that's one of the struggles.

The other thing that they mention -- and I'd like to have somebody's opinions on this, but how many of you have multiple CDs that you have picked up, or have been sent, from meetings that you've gone to that you've never looked at?

(Laughter.)

How many of you have more than 20 of them?

I know I do. I know I do, that have either been sent out or have been given to me.

MEMBER LEECH: See, I don't get the mass mailings, so I'm in the same shape as you.

CHAIRPERSON ELFERING: But does a small plant operator, do they have time to sit down at their computer, if they've got a computer, and put a CD in and go through all of the information on a CD? So is that a practical means of getting information out to very small plants? I just don't see it.

MR. CASTELLANOS: At the very least there would have to be some kind of followup afterwards.

MEMBER LEECH: Well, or there would have to be a real enticing coversheet that went with it that could -- you could real quickly look at to realize that you need to go into more depth.

CHAIRPERSON ELFERING: The other thing is is one of the things that was mentioned is the USDA and the majority of the state programs will have a similar position, these EAIO officers that go out and do assessments of HACCP plans. Is this some -- an area where -- perhaps could be utilized to get the

information out? And is there a potential of using land grant universities and county extension?

MEMBER LEECH: I think that's what you've got to do. It's happening on the screen right here. I'm not sure what -- well, either way --

MEMBER LOGUE: You need to hook that up, so that --

MEMBER LEECH: Oh, okay.

CHAIRPERSON ELFERING: Can you just hook it up right on the -- you should be able to just unplug it from here and hook it up to your computer.

MEMBER LOGUE: Well, we want the notes live if we're going to do -- yes, we'd like to have the laptop.

DR. SYED: Because if we turn this off --

MEMBER LOGUE: Right.

CHAIRPERSON ELFERING: You can just disconnect that one.

DR. SYED: It is very -- some of them have very limited resources. Husband and wife, son and daughter, the other QC people, they are the processing foreman, everything gets --

CHAIRPERSON ELFERING: Yes.

DR. SYED: And their resources are very limited. They cannot afford it, I don't think, in a million years. How can you afford to pay that? It's something that needs to be addressed.

CHAIRPERSON ELFERING: And then, the unfortunate part about that is is the companies that do pay someone to come in and do a HACCP plan for them, after that consultant is gone, they don't know how to answer anything that's in the plan. And so when an inspector comes in and says, you know, why are you doing this, well, because the guy who wrote the plan put it in there. And that's the only response they have.

DR. SYED: Absolutely. I have experience with them and issue an NOIE. And they can answer the NOIE three days before suspension in effect. Now, they have to make who they think -- they get direction from them, and they don't know, because they don't understand HACCP to begin with. They don't understand.

MEMBER DENTON: I have a question for you

before we get too far down this path in thinking about this. We are addressing this with one issue, and that's how we communicate new technology to these small and very small plants. In almost every plant, there is an inspector. Now, I don't know exactly how it works at the state level.

CHAIRPERSON ELFERING: Same way.

MEMBER DENTON: What is wrong with thinking about the person who is the actual onsite inspector serving as the conduit for that particular type of information as it goes directly to these small plants?

It circumvents this whole issue of trying to deal with it on a CD, but let them communicate you need to take a look at this particular type of technology, and then whoever it is that's marketing that technology could be brought into the equation as far as following up on that. But just the initial -- I don't know what -- the initial communication could come from that person that's going to be there in that plant as part of FSIS or as part of the Minnesota state --

CHAIRPERSON ELFERING: And I think that we probably could -- we have to look at it from a couple of different perspectives, and I know that in -- in our state we can certainly train the numbers of inspectors that we have to be able to make sure that we're giving consistent information.

But when you've got 7,000 inspectors out there from FSIS, how do you do the training so that a consistent message is going out to all the plants? That, again, is the difficulty and --

MEMBER DENTON: Do you mean the training on the application of the technology?

CHAIRPERSON ELFERING: Even just getting the information out equally I think is even difficult. You can have somebody from FSIS maybe comment on this, but I think from the standpoint inspectors don't believe that they have any responsibility in doing anything other than inspecting, then you have other trained people like EAIO officers who will actually be going out and doing everything related to HACCP.

All they are is doing verification that the plant is doing. And maybe -- maybe you don't see

it --

DR. SYED: You're absolutely right, because they impact the spectrum. They are not supposed to write the HACCP plan. They are there to monitor the HACCP plan. The EAIO officers, the CSOs, they are -- they are there to do the 30-day reassessment, and then the whole change started. So the mission of the agency --

MEMBER DENTON: I thought that's what you were going to tell me, about the in-plant inspectors, that they have their set of responsibilities and they don't consider communication part of that. So then it goes one step back up or more with regard to who it is or how it is.

I keep thinking about at the state level you've got all of your people that are in agreement with the folks that we've talked to earlier today here at FSIS about the need for having this communicated. My rambling statement earlier was who is the champion at the state level that will then take that into the plant, and how do we do that?

We've got university personnel that can

help with the education part of it, county extension people that can help with regard to that. But who becomes the driver that keeps that motivation?

CHAIRPERSON ELFERING: I think county extension. I really do. We just had -- you know, I guess I can only relay it, the only experiences that I have. But with the recent voluntary premise identification and livestock identification programs that have been put in place, county extension agents have been doing the footwork and getting that information out, doing the training. They've done a phenomenal job with it. They're educators. You know, they're trained -- they're trained to be educators.

MEMBER LEECH: That's what they do.

CHAIRPERSON ELFERING: Yes.

MEMBER KOWALCYK: I would have to agree that the extension would be a very good resource. I think one issue that these small producers face is getting the product out the door and compiling the regulations as they are.

And if there's something that they can adopt that would help them with their HACCP plan, it

would, one, need to come from a credible source, but you're absolutely right, they don't have the time to spend on that type of self-learning. So coming from the extension office I think would be very beneficial.

And also, I would argue that it's incumbent on the agency to identify technologies and -- based on cooperative studies and where they fit within the industry. Some technologies might fit very well with very small processors, but some might be in practice very good but only apply to an XO or somebody like that.

So I think going, you know, maybe two steps up from the front line inspectors to field officers or tech service centers and to the academic side of USDA through the extension to determine what technologies could be adopted by certain types of plants, because as a consumer rep technology is good if used properly.

And you don't want to rush in technology where there is a significant learning curve and these processors, especially those that have been doing it for years and years, you're taking them out of their

comfort level. So I think any way you can approach them from a very clinical source of information to learn that would help get them to but into technology.

CHAIRPERSON ELFERING: And in most cases it's the very small plants that would -- the more simplistic the better. They don't want to -- they don't want a lot of sophistication. So even with this sanitizing halo that has been talked about, it might be a very simple piece of equipment.

If a company can put something like that together, and it's very inexpensive, easy to operate, easy to maintain, that's something you would accept much more readily than having a new student pasteurization on carcasses.

MEMBER LOGUE: Can I make a point here?

CHAIRPERSON ELFERING: Catherine, yes?

MEMBER LOGUE: Something that came up when I thought about this -- they talk about how right now they've got these -- you know, university institutions, these cooperative agreements, how they are encouraging the small plants to get involved with these.

Or you said something like, "Can the agency -- we can make a connection with the institution," and the small plant would say, "Hey, you know, there is one down the road that produces so many -- so much capital every month. And maybe they're interested in this kind of stuff. How about you guys get together and see if you can come up with something?"

A small plant would say, "Here's what we'd like to do. I mean, we're work one on one with an institution. And that, you know, we're willing to do it." And then, come up with a plan between us and go after the --

CHAIRPERSON ELFERING: Well, I'll relay one more story is the University of Minnesota sent out to all the very small plants in the State of Minnesota that one of their microbiologists who is a HACCP expert would review their HACCP plan for $100 and give recommendations. Do you know how many she got?

MEMBER LOGUE: Two?

CHAIRPERSON ELFERING: Two.

(Laughter.)

MEMBER LEECH: They still didn't -- the people still didn't know her, and they still -- the timeline to get it done, for it to meet the deadlines, and we all put things off until the last minute, and there are a lot of reasons why that probably happened that way.

CHAIRPERSON ELFERING: But, I mean, it was just another good example of how doing outreach to these very small plants is just not that easy.

MEMBER LOGUE: Maybe the county extension agents could develop these guys better at the --

MEMBER LEECH: Be able to make some relationships, right.

MEMBER LOGUE: -- and to help build that relationship.

MEMBER LEECH: Right.

MEMBER DENTON: There's an element of trust that's there with, again, the local community that folks at universities just don't have.

MR. CASTELLANOS: Isn't it also incumbent on the manufacturers of technology to, you know, provide the education, the accessibility, the

training, etcetera, etcetera, etcetera. I think part of this is really the USDA working in conjunction with an approved technology manufacturer.

Once that technology has been identified, I don't see really why the USDA should take on the role of the expert here.

MEMBER LEECH: Well, the problem is that the companies only want to go after -- after the plant if they can make enough profit off of it. And these small ones are ones that, you know, I mean, it's a whole lot more financially lucrative for the technology folks to go after somebody who is going to pay them a whole lot than these plants.

And what we're talking about is technologies that don't cost a lot of money, because these small plants can't afford it. So that's why historically a lot of different technology issues -- extension has been there for those folks, because if you just let the competitive market take care of it it's not going to happen, because there isn't a big enough margin of profit.

That's what we're talking about is the

ones who are, frankly, unprofitable for those folks to want to give them a whole lot because they're not going to pay a whole lot.

MEMBER DENTON: Do you want to try to tackle these questions one at a time?

CHAIRPERSON ELFERING: Yes. So if we were to ask these -- if we were to go ahead and try to answer the first question, "What are the best ways to get information derived from cooperative agreements to small and very small establishments?" What would our best response be?

MEMBER DENTON: I think it's a multi-layered sort of thing with the trade associations, some of whom are large and some are middle-sized and some are small.

CHAIRPERSON ELFERING: I don't know if every state has a trade association. I would think probably not.

MEMBER DENTON: I'm thinking about a group like American Association of Meat Processors, Joe and his group.

MS. WARFIELD: Some of the larger

associations like that, and then filter it down through the state associations.

MEMBER DENTON: Right.

MEMBER LOGUE: But what happens if you get those from --

MEMBER DENTON: That's what question number 4 is, or number 3.

MEMBER LEECH: But what I'm wondering is, I was trying to think about what people read, because I still think, you know -- I just know for me, when I get electronic newsletters, and so forth, and I've got to go to a certain website, the odds of me doing it when I'm hooked up to my high-speed, you know, modem -- to the internet versus at the office versus the modem at home, I don't end up doing -- the things that I end up reading are the things that I can stick in my briefcase.

I've got three or four of them with me right now that -- when I get stuck somewhere for a while, I'll read them. So my thought is for these folks: how do we figure out what kind of things they read?

And I found myself this morning even wondering about the local small-town newspapers, that if the technology is good -- you know, the press releases -- the local small newspapers will print anything that comes from a government agency. I'm not joking. And don't print them verbatim. They won't -- now, you know, the big -- the big-time newspapers don't have anything to do with it, but extensions learn for years, and that's one way you get things out.

And so part of it is the public becomes aware and is educated about the technology along with the operator of the plant. And, again, I think one of the things that, particularly in agriculture, but in some other places as well, that we've been guilty of is not providing the public with information so that it came along with everybody, and all of a sudden they went -- I mean, I'll use the genetically -- modifications things.

People just have had conniptions. What they didn't know is that for years and years -- it has now kind of come along, so most of our soybeans are

now -- most people, therefore, have been eating genetically modified foods for years now and haven't even known it.

I wish that as we were starting that process we had been explaining to the public that was happening. Same kind of -- you know, I mean, there are people who would give us some of the processes that we -- so if you're bringing people along, I think the public, as well as the providers, I think you're ahead.

CHAIRPERSON ELFERING: And I think one thing, too, to keep in mind if we're going to be looking at some of these trade associations is they represent a wide variety of processing facilities that are not under inspection. They're not under an inspection program.

They're either a retail-exempt facility or something that does not even have to have a HACCP plan. So I think that's one of the things that we've got to be able to do, first of all, is identify who all of these very small plants are. So, and is that something that, you know, FSIS has to be able to

identify, first of all, who they are.

MEMBER DENTON: I agree. That was exactly where my question was going this morning with regard to how many -- they said something like 6,000 plants that are part of PBIS, 200 of which are large, so you've got 5,800 of the small and very small plants, then you've got all of those that operate at the state level inspection that are probably not going to show up -- some of them are not even going to show up on what FSIS has as far as their listing.

CHAIRPERSON ELFERING: And I would guarantee that the majority of state-inspected plants are very small and some are small. But the majority of them are very small.

MEMBER LEECH: I would agree.

MEMBER DENTON: So identifying your target audience is probably the very first step.

MEMBER LEECH: And it needs to be done in a non-threatening way, as in -- I mean, there's a lot of fear there of people wanting to do away with state programs and that kind of thing, and so you've got to be real careful not to open that can of worms, just

because you're trying to get education to be --

CHAIRPERSON ELFERING: So, number one, first of all we have to identify who the audience is.

MEMBER DENTON: And that first question you ask about the best ways to get information derived from the cooperative agreements, that -- I think that assumes that we have the technologies and that they have worked.

MEMBER LEECH: We've got the track record.

MEMBER LOGUE: So you are assuming that somewhere along the way --

MEMBER DENTON: Yes. So now we're talking about who or how we can communicate that. It can be from FSIS direct. It can be through a trade association, through the equipment manufacturer.

MEMBER LOGUE: Extension agents.

MEMBER DENTON: Through the extension agent, and through the state --

MEMBER LOGUE: County agents.

MEMBER DENTON: -- level personnel.

MEMBER LEECH: All of the above. One method is not going to work.

MEMBER DENTON: Right.

DR. SYED: We can also include the state directors that you --

MEMBER DENTON: Yes.

DR. SYED: -- they can send the information there, and they can pick up -- at this time, we have only a website.

CHAIRPERSON ELFERING: But federal-state relations has a listing of all of the state plans.

DR. SYED: So this will be the way we --

CHAIRPERSON ELFERING: Yes, definitely.

MEMBER DENTON: Have we overlooked anybody in that list?

MEMBER LEECH: Is the information that's on those CDs, and so forth, is it accessible off the internet? That if somebody decided today that they wanted it, they could go in and just down -- open up that CD --

DR. SYED: The three I have right now, those items on the website, they can use that for the information --

MEMBER LEECH: Okay. Because my thinking

was that, yes, we cannot assume that they have computers, but these days increasingly people are going to the web and looking for information. And if all the information they need is there, and they can read it the minute they're interested in it versus ordering it and waiting for it to come in until some other point, that's a part of hitting the teachable moment thing I think.

DR. SYED: We are looking at that. They can get in touch with us, just give us a call, send us an e-mail. On our website, when somebody sends an e-mail, we get it whether it's day or night. I get it on my Blackberry. So we can respond quite quickly.

Last night at 11:15 I got a proposal for 2005, and at 11:15 I sent it back -- I send it back on the Blackberry, forwarded it so that it can be put in a tracking device. And we have a tracking device with tracking numbers, so we can go back. So we can work on that. That's good.

MEMBER DENTON: I see the big challenge there in that, and I think that what you're proposing is very good. The key issue in that is: how do we

make these small/very small operators aware that those resources are there? So we've got the issue of how we go to communicate through all of these vehicles that we have.

MEMBER LEECH: But if you can send to one place and -- for something new, and then they know that when the next new thing comes along they could maybe find it in the same spot, and they get -- so, you know, but it -- so it is a matter of being --

MEMBER DENTON: What you're getting at is what I wanted the first time is how do I talk to somebody that's in -- pick a plant --

(Laughter.)

-- in your state. How do I reach them the first time to make them aware that we have this whole new technology effort that they can then access in the future? We've got reach out to them the first thing.

CHAIRPERSON ELFERING: And I will say in this -- in our particular instance, the state inspector.

MEMBER DENTON: Okay. So that's --

MEMBER LEECH: I think in a lot of cases

it's -- I think that's true in a lot of cases, because that's who you've got a relationship with.

MEMBER DENTON: Yes.

MEMBER LOGUE: So do you consider the state inspector, then, to be the first line of communication?

CHAIRPERSON ELFERING: Yes. And that's not to mean -- and there's a lot of FSIS inspectors that are exactly the same way. They go out to these very small plants, and they want to be able to educate. You know, you have -- no matter where you have, they have a group that are going to -- are going to be hard-nosed. They still want to be command and control and --

(Laughter.)

-- they're not going to educate anybody in anything. So the front line inspector is still really the -- could be the first line of contact.

MEMBER DENTON: First line of contact.

CHAIRPERSON ELFERING: Yes.

MEMBER DENTON: Okay. All right. Did we capture --

MEMBER LOGUE: So the question then becomes, do you have state inspectors as your first line of communication? Is he willing to do more in his job? In other words, is he willing to not just do inspections but think outside the box here and help make connections to other things?

CHAIRPERSON ELFERING: I can only answer for our state. I can't answer for any other state program or FSIS. I know ours would.

MEMBER LOGUE: They would be.

CHAIRPERSON ELFERING: Yes.

MEMBER DENTON: And I have to think that as -- as committed as you are to it, and some of the other folks that have sat around the table -- Lee Jan from Texas as an example --

MEMBER LOGUE: Yes.

MEMBER DENTON: -- I think that the effort is going to be there among your colleagues that operate at your level.

CHAIRPERSON ELFERING: Definitely.

MEMBER DENTON: So that becomes a very doable --

DR. SYED: Do we have good contact with Mickey Clark in the --

CHAIRPERSON ELFERING: More with Craig White.

DR. SYED: Craig White.

CHAIRPERSON ELFERING: Yes. Because Mickey has been kind of in and out for a while, but Craig White and Geoff Lagg. But Geoff has left now, too, so --

DR. SYED: Geoff has left. Craig White was the MP officer in --

CHAIRPERSON ELFERING: Yes.

MEMBER LOGUE: Craig is good. He's from military, too, and he knows quite a bit about it and he has a good personality.

CHAIRPERSON ELFERING: Yes. And I really think -- one of the things I think that we can do is -- to have some good consistency is so that maybe if we even had -- had the exact same type of information go out, so it could even be developed as an FSIS document, but keeping in mind that it would be something that a state inspection system would also

use the same --

MEMBER LEECH: Yes.

CHAIRPERSON ELFERING: -- informational letter, or whatever you'd want to call it.

DR. SYED: Letter of information. Put everything in the letter, send it.

MEMBER LEECH: In, hopefully, real people language versus technological regulatory language.

MEMBER KOWALCYK: And that goes to Kevin's point earlier about the inspectors and their take on their role. There is, I would argue, another level of communication from the agency to the inspectors, so that they buy into it that, yes, this technology can help plants by inspecting.

CHAIRPERSON ELFERING: Yes, that's an important part.

MEMBER KOWALCYK: If you're going to recommend to the plant that you're helping them do their job better, but we're also -- we're also helping you do your job better. So it's kind of that --

MR. CASTELLANOS: But I think the other side of the question that goes with this is to make

sure that the left side, or whatever that resource is, what we talked about here, is up to date. And with the help of, you know, the people who are the experts for the specific types of technology, whatever they may be, is to make sure that it's comprehensible and up to date, because, you know, that resource will need to be -- I mean, it will be a dynamic thing. In order to be up to date, there's going to have to be some streamlined communication on that end, too.

CHAIRPERSON ELFERING: And, actually, I think FSIS keeps their website up to date quite well. I think they do a really good job keeping their website up to date.

DR. SYED: We update ours mostly every day. So my question is: those states, you know, that don't have a meat inspection, do we think it's -- they can communicate with the very small plants to provide information, or the front-line supervisor should have certain role?

CHAIRPERSON ELFERING: For exempted facilities or --

DR. SYED: No, for the very small plants.

CHAIRPERSON ELFERING: Do you mean in designated states?

DR. SYED: Yes.

CHAIRPERSON ELFERING: It would be -- the front-line inspector would be doing that.

DR. SYED: That is the main resource for them.

CHAIRPERSON ELFERING: For the initial contact, yes. I think for that very first initial contact, this is information that's available on some new interventions that are -- or new technology that's available. That first contact should come from the front-line inspector.

And then, if they would have -- if they would need more information, then maybe we could go up to county extension, where they would be able to provide them with even more in-depth information on something, and help them implement it.

DR. SYED: The reason I'm asking this question is I think we have -- we send a report on new technology to the district managers, DVMs, front-line supervisors. And that gave you -- there he made

reference to what is new, what has been improved, but issued no objection letters there, and most up-to-date information is available. I will design it -- new information is on the top.

CHAIRPERSON ELFERING: I think, though, that what -- weren't there front-line inspectors who had a problem with -- in the past with trying to -- you know, they may even buy into some of the technologies that are available. There is always that big fear in the back of their heads -- what if it doesn't work?

MEMBER LEECH: Right.

CHAIRPERSON ELFERING: And I've been telling them this is -- this is good technology, it's going to work, and all of a sudden down the road you have a food-borne illness outbreak, or a recall. And the plant operator is going to say, you know, "You said this was going to work."

And I think that's one of the fears that the inspectors have. That's why it would be good to have somebody like county extension to come in and do a -- if they needed more information in doing

implementation of it, that would be done somewhere from the outside, rather than from the agency.

MEMBER LEECH: Well, but also it's a matter of education and regulation are separate. If you're being educated by a regulator, there is an implied pressure to accept versus, you know, really going through and evaluating it for yourself. And that's what you get up there, too, so, yes, I think it is important to have a separation between who does the regulation and who does the education.

But I still think the regulator can help make aware that this is available, and tell them to --

CHAIRPERSON ELFERING: Yes, definitely. And that's pretty innocuous, that's pretty innocuous for them.

MEMBER LEECH: I think that's -- that's safe. But they can then be the major conduit of the real in-depth education.

CHAIRPERSON ELFERING: Exactly right.

MEMBER LEECH: They can say, "Hey, you know, these new things are coming along. You may want to" --

CHAIRPERSON ELFERING: Yes. And you're going to have some inspectors that are going to say, "I've seen this operate." You really want to -- this is something you really want to do.

MEMBER LEECH: Yes.

CHAIRPERSON ELFERING: Or at least really look into.

MEMBER LEECH: Or I think -- yes, I think it might fly in your situation. I thought it even when I learned about it, you know.

DR. SYED: Do you think the district should have some role in it?

CHAIRPERSON ELFERING: The district?

MEMBER LOGUE: That's what I was going to ask you. Do they have --

DR. SYED: That's a question I will ask, because I'm thinking what I need to do.

CHAIRPERSON ELFERING: Definitely. I think that, yes, the district would be getting that information out. And, you know, one of the things I think is is that to me anyway, in my experience, is even when I was in -- you know, if I was an inspector,

I would take information that came from my circuit supervisor much better than I would take it from the administrator.

So I think that you've got to get it down to -- get it down to the district -- district offices, out to the circuit supervisors, and out to area supervisors, or whoever, the level that it needs that's going to be the most appropriate.

DR. SYED: The question -- I have one -- about the inspector, because everybody knows they're a member of the bargaining unit. We cannot pass on management function to them. We have to be very careful because of labor regulations. That's what I was trying to clarify -- the district has a role in that.

The inspectors or the members of the bargaining unit, if we give a management function to him, he can document the technology. It's very cheap and cost effective. Such-and-such plant is using it. You can use it, too. But then, somebody might come back and say, "You are using plant inspectors and the bargaining unit for management function." So that's

what I was trying to clarify -- how I can approach that issue.

CHAIRPERSON ELFERING: But there wouldn't be a problem if they were to be a delivering that initial message.

DR. SYED: We can do it last minute. The PBIS does it every two weeks, and we can work on that. Because that won't go anywhere if there is going to be extra cost.

MEMBER LEECH: And I think it's a matter of how that message is presented to that inspector, too. You know, if the inspector sees the new technology as a potential to help make their job better, you know, then they won't be complaining or whatever about being asked to help share.

So it's kind of a matter of how it gets framed, you know, and so forth, and who the message comes from and how it's done, which is what I think Kevin was saying earlier. That makes a big, big difference.

MEMBER DENTON: I've been thinking about that, because it leads us into the next question.

MEMBER LEECH: Oh, good.

MEMBER DENTON: And --

(Laughter.)

All I have so far is -- and the question is, "How does FSIS effectively present scientific information to small and very small businesses?" I think we have to have simple, powerful messages.

MEMBER LEECH: Yes.

MEMBER DENTON: And then, we have to identify resource contacts. That could be an extension, it could be the equipment manufacturers, someone that can actually followup and get into the nuts and bolts of what this is going to mean once that's put in a -- in an operation and how that person is going to deal with that.

MEMBER LEECH: Oh, yes.

MEMBER DENTON: I'm sorry?

MEMBER LOGUE: You may have some researchers wanting to do it, too.

MEMBER DENTON: Absolutely. And university --

CHAIRPERSON ELFERING: I would think that

somebody who is -- someone who has actually come up with the -- with the technology. You know, if it's someone who is doing the research --

MEMBER LOGUE: They may be willing to work one on one with the plants, and then --

CHAIRPERSON ELFERING: They'd love to do it.

MEMBER LEECH: Yes.

MEMBER LOGUE: Hey, you know, most of us need it for tenure anyway. I think for us it --

CHAIRPERSON ELFERING: Sure.

MEMBER LEECH: Staying around.

MEMBER LOGUE: Exactly.

MEMBER LEECH: It doesn't stop at tenure.

MEMBER LOGUE: Oh, I know, but that's what I'm saying. You get a lot of young researchers coming in that want to do this. There's no reason why not. It's already expected of them.

MEMBER DENTON: And that helps validate that process.

CHAIRPERSON ELFERING: You know, and I think one of -- and this is off the subject a little

bit, but a lot of these researchers now, if they can't get it -- they can't get a graduate student anymore for under $50,000. So if there's a $25,000 grant available, they go --

MEMBER LEECH: Yes. You've got to be able to pay tuition, plus their stipend, plus supplies, plus at my university I think there's a certain amount of health insurance that's part of it now, too. And then, the university wants 52, 54 percent overhead. And won't -- you know, I mean, it's getting ridiculous, but that's where we are, because states have cut back on funding so much that we don't have the money to pay graduate assistants.

And they say, "Ahh, no problem. Faculty can just write grants." Well, you find a granter who wants to pay you 200 percent to do the job.

MEMBER DENTON: I could name some of the places that will.

(Laughter.)

National Institutes of Health.

MEMBER LEECH: Yes. But --

MEMBER DENTON: But if you want something

that's going to walk out here into Minnesota or in Arkansas --

MEMBER LEECH: They're interested.

MEMBER DENTON: -- in a plant that's got six employees, you're not going to find NIH or NSF that's interested in any of that.

MEMBER LEECH: No. No.

MEMBER DENTON: So it's going to come back around to looking at these cooperative agreements like what they're talking about, and having several interested parties that are willing to collaborate --

MEMBER LEECH: Yes.

MEMBER DENTON: -- to help benefit industry that is needing the help.

MEMBER LEECH: Well, and I think what the universities need is more and more people in the industry to keep saying to the administrators that we need this stuff done, you know, and it cannot -- you know, that this is unrealistic, and, you know --

MEMBER LOGUE: Well, one of the ways that happens is -- or how we do it at our place -- is advisory boards that come in and tell us issues that

are of concern to them. It's like, "This is stuff that's bothering us, and we need somebody to look at it."

MEMBER LEECH: You've got to get approval from --

MEMBER LOGUE: Very true.

DR. PATEL: So to summarize the second question now, we are still on the first --

MEMBER LEECH: Well, I thought we were on the third one.

MEMBER DENTON: I think we just about are, because this is one that's going to be the tough nut to crack -- is how do you deal with small and very small establishments that do not belong to a trade organization? Because you're --

MEMBER LOGUE: But they have to be listed somewhere, don't they?

MEMBER DENTON: They are. They are definitely.

MEMBER LEECH: Yes.

MEMBER LOGUE: But where is the absolute place that if they -- if they only saw one animal a

month, where are they listed?

CHAIRPERSON ELFERING: They have to be issued an inspection.

MEMBER LOGUE: So --

CHAIRPERSON ELFERING: And so the state is going to have a list of plants, FSIS has a list of plants. Every facility has an establishment number.

MEMBER LOGUE: Okay. So --

CHAIRPERSON ELFERING: So even if you have an establishment --

MEMBER LOGUE: That's where you're going to go, then.

CHAIRPERSON ELFERING: Yes.

MEMBER LOGUE: That's the ultimate list.

DR. PATEL: Federal-state relations?

CHAIRPERSON ELFERING: Yes. Federal-state relations will have every state by -- now, it may not be 100 percent accurate, because that changes regularly, but --

MEMBER LOGUE: You have people going out of business and people going into business.

CHAIRPERSON ELFERING: Yes.

MEMBER LEECH: Do they have the complete contact information that would be needed?

CHAIRPERSON ELFERING: Yes.

MEMBER LEECH: Okay.

CHAIRPERSON ELFERING: They've got name, address, establishment number. Yes, they've got everything.

DR. SYED: Telephone number, too. The telephone numbers are listed, too.

MEMBER LOGUE: They may not have e-mail.

MEMBER LEECH: That was what was in my mind.

CHAIRPERSON ELFERING: And for us, it's on our website, too.

MEMBER DENTON: It does put our effort at a little bit of a disadvantage, because you don't have that trade association that can help reinforce the adoption of the technology.

MEMBER LOGUE: Yes. Well, that's where maybe somebody like a county agent or somebody that --

MEMBER LEECH: Or the inspector maybe starts referring them to check with the county agent,

who encourages them to come to sessions, and then they maybe get the idea that they need to do a trade association, or whatever. But requiring it is not going to happen. He is going to sell them on a one-to-one basis.

CHAIRPERSON ELFERING: You almost have to have a county agent go out there and first introduce themselves.

MEMBER LEECH: Yes.

MEMBER DENTON: Yes. Develop that relationship.

CHAIRPERSON ELFERING: Yes.

DR. SYED: How new technology staff at FSIS can get in touch with county extension agent providing the information? On each county or through the state? I'm just asking a question how I can approach this issue.

MEMBER LEECH: Oh. You've got a state leader who can -- you can go to the state leader, who can get you the subject matter specialist who is in charge of that kind of thing, and they're going to bring their agents in for training probably once or

more a year, and you want to get into that cycle.

And, I mean, but they -- the extension has got a network, and you don't need to find all those individual county agents.

MEMBER DENTON: It is way more efficiently organized than that from your perspective, because you will get --

MEMBER LEECH: Yes.

MEMBER DENTON: -- contact state leaders.

MEMBER LEECH: Yes.

CHAIRPERSON ELFERING: In every state -- FSIS has established in every state a HACCP contact and a HACCP coordinator. And in most cases the HACCP coordinator is someone who works for extension at a university. It's typically an extension person. So I would utilize the state contacts and coordinators also.

MEMBER LEECH: Right.

CHAIRPERSON ELFERING: And that's Mary Cutshall's. Mary Cutshall has all of those.

MEMBER LEECH: Well, I mean, in a sense she's trying to meet the needs of people, and this

kind of thing -- you know, these health and safety kind of issues are things that the extension intends to work with, and especially when you've got the backup resources.

I mean, the things that we need -- you know, those CD-ROMs, and whatever, you train the extension agency, get them to them, and, boy, you know, that's how you get them distributed. But if they had to create the materials, you'd get into a bigger issue. But since what we have is there --

CHAIRPERSON ELFERING: But, you know, the more I think of it, though, these state contacts and coordinators, they should -- every time you have some new technology that's out there, that should just get sent out to them.

DR. SYED: So they are sent to them, and then --

CHAIRPERSON ELFERING: Definitely. And, you know, you throw enough mud, sometimes it's going to stick.

MEMBER DENTON: I have a question.

CHAIRPERSON ELFERING: Not like this is

mud.

(Laughter.)

MEMBER DENTON: I have a question for you.

CHAIRPERSON ELFERING: Yes.

MEMBER DENTON: On your FSIS website, will you have a section that's devoted just to the new technologies found?

CHAIRPERSON ELFERING: Yes.

MEMBER DENTON: Okay.

DR. SYED: It is on this slide.

MEMBER DENTON: That may not be the right word. The new technology --

DR. SYED: It is right on -- it is page 2. It is item 4, page 2 on the top, on this one.

MEMBER DENTON: Oh.

DR. SYED: And I'll send that one, too. I think it would be on the other one.

DR. PATEL: Not on the written one. We don't have it.

DR. SYED: Not on that?

MEMBER LOGUE: You know, one thing else I think is worth doing is when you've got institutions

involved in the research, get them to go out and as part of the agreement make them --

MEMBER LEECH: I had wondered about that, too, when it was -- whether we could with whatever you put out with cooperative agreements, require that there be an outreach part of it.

MEMBER LOGUE: Yes.

MEMBER LEECH: Because a lot of grants are doing that.

MEMBER LOGUE: Yes.

MEMBER LEECH: And so require that they develop a strategy for sharing the results. And I started to ask earlier whether, as a part of all of that, I mean, you require folks or folks do -- I'm assuming they publish in journals and that kind of thing.

MEMBER LOGUE: Well, you can have them assigned from the journals that they have to --

MEMBER LEECH: Have to do -- yes, that's what I'm saying.

MEMBER LOGUE: -- do something that --

MEMBER LEECH: But if you build in the --

they've got others there, and the outreach, making it -- what's real for real people, that's the part we tend to leave out.

CHAIRPERSON ELFERING: I see here that you have the cooperative agreements posted on the website as they are listed for FY2003. Do you have -- within that, is there a section specifically devoted to those new technologies that are now available, separate and apart from all of the other paperwork?

DR. SYED: I think we are still working on it.

DR. PATEL: And some of the information is that August 2004, and then we had proposed that rule from the -- those new technologies, you know, notification and approval. But it's on the proposals or -- once we, you know, issue a new technology, it will be posted.

MEMBER DENTON: Okay. Because I can see just getting buried in a lot of the other staff.

DR. SYED: Once you get that done, what happens is you're going through our chain of command, then go to OGC.

MEMBER DENTON: Okay.

DR. SYED: Once OGC clears it, then we will publish it. And then we had -- we had asked them once it's submitted whether they want us to have it on our website or not. And we put it on the website, and that's public record. Anybody can view it.

MEMBER DENTON: Okay.

DR. SYED: Hopefully we will get it clear soon.

MEMBER DENTON: Okay. Thank you.

DR. PATEL: I'm thinking most of these countries who are doing this on new technologies, they do want to disseminate that information also. For example, there is a website with electronic --

MEMBER DENTON: Right.

DR. PATEL: -- they have done --

MEMBER LOGUE: Yes. But those kind of guys are most likely only going to go as far as trade shows, because they're only going to go to places where they can get a bunch of people together. They're never going to go to Joe Schmoe down the road. That's the thing.

And you may -- you can understand that, because they spend -- they'd never get anywhere if they kept that up. I mean, they have to limit where they can go. But maybe that's where you have --

MEMBER DENTON: They have to focus their efforts.

DR. SYED: And then, the other question came up about new technologies, whether you --

MEMBER LOGUE: That's true, yes.

DR. SYED: -- whether you want to put that on the website or not, because you want to protect it.

MEMBER LOGUE: But that could be covered under the cooperative agreement. You can say under the cooperative agreement that, no, you develop this technology for this -- this problem. You cannot go ahead and use this -- well, I'm talking about for somebody like me, as a researcher, doing it. You could make that part of the agreement.

DR. SYED: And a cooperative agreement would be -- it is ours. We can put it on.

MEMBER LOGUE: Right.

DR. SYED: But I know other companies who

have their own technologies that --

MEMBER LOGUE: You're talking about somebody like --

MR. CASTELLANOS: But we'll have -- for example, what's on our website is public information that we want to make public, we want to make understandable and comprehensible for laymen, and especially whoever would eventually use it. So, I mean, there is really no secrets there.

What's on the technology website is -- could very easily be put on, you know, the website FSIS -- and if we wanted, it could be centralized, just by way of example. But I should we should make it as comprehensible as possible. Nothing is, you know --

MEMBER DENTON: It's part of your marketing.

MR. CASTELLANOS: That's right. Absolutely.

MEMBER LOGUE: But for the cooperative agreement stuff, like Dr. Leech says, you can make it part of the agreement.

DR. SYED: We paid for it.

MEMBER LOGUE: You paid for it. Exactly.

DR. SYED: We paid $500 for --

MEMBER LEECH: So you make it a part of it, and you require that that's -- explain that's going to happen.

DR. SYED: So are the cooperative agreements -- they are on the website, but these take a long time. They're back and forth, back and forth. I have 2003 -- it takes a year before we get the deliverables. The deliverables are 60 to 90 pages. I have one staff member totally dedicated on deliverables.

Then, there is set criteria for her to meet. After that, they go through a review process with the committee. And then we pick one which is the best one for small and very small plants and use it -- and cost effective. I'm just -- it's a long process.

MEMBER LOGUE: So how can we circumvent the -- or make the process faster?

DR. SYED: We are starting to -- it first came in in September 2004. This is how we are doing

it. It's just taking time. We are getting work done quite -- rapid return to save time. They will say, "I need a cost extension for 90 days." The graduate student was working on -- another thing I hear is I can't put anything on website until it is approved and I get a release from them.

MEMBER LEECH: Yes. There's not much you can --

DR. SYED: I have to get this approval for -- I don't want to put something on that has -- something happened for this.

MEMBER LOGUE: There's no way around that.

MEMBER LEECH: Well, but, of course, we're trying to get those theses done fairly quickly, too, so, I mean, we're getting a lot of pressure to complete those faster than we used to. So you may not -- those extension efforts -- extension, you know, it doesn't work in the student labs right now a lot either. So that may help.

DR. SYED: We are working on it. One of the deliverables that came in -- we sent a four-inch binder, four or five of them. We had put them on CDs,

and then asked questions. I think 2004 will be much better than 2005. We haven't done --

MEMBER LEECH: Well, it may be that, yes, as a part of the requirement, but, you know, the 90-page paper, whatever, is part of it. But if you ask them to give you, you know, the condensed version, and just make one of the questions that they've got to answer with their deliverable, you know, "What would you provide for a small -- if you were, you know, to get information about this to a small plant manager," you know, right?

MEMBER LOGUE: Just like the layman --

MEMBER LEECH: The layman report as well as the research report.

DR. SYED: We are trying to work out a one-page or two-pages abstract. That's what we are working on. And there are three or four --

MEMBER LOGUE: And a lot of us are used to doing this, because we do it all the time.

MEMBER LEECH: Oh, yes.

DR. SYED: We can put a graduate student --

MEMBER LEECH: Yes.

DR. SYED: -- at one point to --

MEMBER LOGUE: So, really, you can take care of some of this stuff by redesigning the cooperative agreement.

DR. SYED: Especially the deliverables.

MEMBER LOGUE: The deliverables, the -- maybe you even design something about the timeframe that you -- you can have an extension for X number of days or X number of months, but nothing beyond this. I don't know. That one might be harder, but

DR. SYED: No. We are not providing -- the agency is not providing more than 90 days' extension, because then they linger on. When the storm came in and we have a -- such-and-such storm in Florida, the last year in the summertime, so a lot of things happen in Georgia, too. And how far you can go and how much extension we can get, because we pay them money.

MEMBER LOGUE: Right.

DR. SYED: We want something out of it.

MEMBER LOGUE: Right.

DR. SYED: There is taxpayer money in it.

MEMBER LOGUE: Okay. So we had that, and we had the time, and we had the layman's report. We probably have to think about the proprietary information. What else can we put in there? I think big things --

MEMBER LEECH: That's the big stuff.

MEMBER LOGUE: Yes.

MEMBER KOWALCYK: That seems to fit nicely within question 2 as far as effectively communicating this information to developing bodies, which is the small producers. So that is --

DR. SYED: Anybody has any other thoughts?

MEMBER KOWALCYK: I guess, Dr. Syed, as far as the agency has experienced so far, the efforts that have been successful, they have communicated with small plants regarding the new technology that was found, what worked, what didn't work so well. Do you have any anecdotal --

DR. SYED: Well, in 2003 they came in September. And these two we had -- we sent it back. We put them on the website some time in March. Not

much time spent on that that we can have feedback. But it is available. How I can send it to them, so they can use it. They can use it like an addition process for HACCP. They can use hat.

That was a question we were asking -- our agency had done it, and we developed a flyer -- one-page flyer. And my main purpose in asking these three questions is they're getting older in years now, and technically I'm sure the agency --

MEMBER LEECH: And aren't those press releases -- and, by the way, the land grant universities, they've got a network already, you know, for all those little papers, you know --

MEMBER LOGUE: And the county agents?

MEMBER LEECH: Yes. The agents who --

DR. SYED: And we can burn some CDs, too. We can work on that. Those are not that expensive.

MEMBER LOGUE: Of these three technologies you said that worked, has anybody else taken them up besides where they were originally started? Did anybody else -- have any other small plants decided, "Oh, you know what? Thing looks really cool." Has

anybody tried? And, if so, I'm curious about feedback.

DR. SYED: Not really. Not yet. I don't have that.

MEMBER LOGUE: Yes. It's March.

MEMBER LEECH: We really haven't had enough time for it to happen.

DR. SYED: And very small plants may not be keeping their website with all of the information that is --

MEMBER LEECH: But, again, if you could -- if you could maybe put out a big effort to get information that this is where you go for new information, and, you know, work on the ongoing -- that tells people that. And then, if you can get to the point that you know -- that you can then let people know that, you know, new information tends to get here on -- in March every year, or whatever. You know, so that every time there's a new one you don't have to start over completely.

DR. SYED: Do you think that a small town newspaper, as we discussed, if we put some article in,

do you think that would help?

MEMBER LEECH: Oh, absolutely.

MEMBER LOGUE: In a tiny town of, what, 120 people, everybody reads the local paper.

MEMBER LEECH: Everybody. It's like that -- like you had years ago with a party line. It's the same thing.

MEMBER LOGUE: Oh, yes. I mean, and those papers, many of them don't have a lot of staff to write. And anything that comes out from a government agency they print. I mean, I still get the local paper from where I grew up. My mother pulled one of those, "Here's a subscription for a year. After that, it's for you to do. And if anything good appears in the paper, I'm not going to tell you. So if you want to know what's happening at home, you'd better get it."

So, but anyway, I still get that. And I'm amazed at the high proportion of the articles that come from state and federal government. I mean, Social Security puts stuff out all the time.

MEMBER LEECH: Extension will have

articles in there on how to --

MEMBER LOGUE: You know, the CPAs put stuff out, and they take it. You know? They'd be delighted to put stuff out. And especially when you're announcing a new -- I mean, yes, I see it as educating the public and the plant. And so you're bringing everybody along, and you're -- the possibility of the public hearing about it later and going, "Oh, no," you know, is reduced substantially.

MEMBER LEECH: And especially if it's a tiny town that has a small plant that employs like 20 people.

MEMBER LOGUE: Oh, yes, they'll all talk about it.

MEMBER LEECH: They'll all say, "Oh."

MEMBER LOGUE: Yes.

MEMBER LEECH: And even if the guy in charge doesn't read it, someone is bound to have read it.

MEMBER LOGUE: Exactly. And the newspaper editor in that town knows that that's one of industries they've got, so they see that come through,

and they'll say, "Oh, yes, we've got to run this."

DR. SYED: Especially in small towns.

MEMBER LEECH: Oh, yes. All those.

DR. SYED: If they are not close to a main highway and industry, that's the only thing that they have.

MEMBER LEECH: Oh, yes. And it may only come out once a week or twice a week or every two weeks, or whatever it is. But they all read it.

MEMBER LOGUE: Let me ask you a question, being the industry kind of guy. Okay. Most of the time you deal with these bigger plants. How would you try and find out about these smaller guys? If you -- if you assume, you know, we'll go to Georgia this month, and we'll try and visit 20 or 30 of these tiny guys. How would you find out about it?

MR. CASTELLANOS: Well, funny you should ask. We've been going through -- actually, have science as a resource, try and come up with -- suffice it to say, our database is still a work in process.

MEMBER LOGUE: Okay.

MR. CASTELLANOS: We haven't gotten it

totally solved yet, and in part because the rates are classified. There really aren't any --

CHAIRPERSON ELFERING: I'm apologize. We've got a facility that we're either going to have them close down today or -- at any rate, it's a big -- a huge retailer that is infested with rodents. And their initial contact with me was, "We don't know if we're going to cooperate or not." And I said, "Well, let me know your decision as quickly as possible, so I can contact our Attorney General's office, so we can get an injunction and close you." "We are cooperating."

MEMBER DENTON: Amazingly.

(Laughter.)

CHAIRPERSON ELFERING: So it was just their attorney I just talked to. So I apologize.

So we're wordsmithing?

MEMBER DENTON: Yes, we're playing.

MR. CASTELLANOS: I don't know if I answered your question.

MEMBER LOGUE: Well, I wanted to see how would you follow up if you decided to go to the

smaller ones? You know, like I said, most times industry is only going to go as far as trade association meetings. So --

MR. CASTELLANOS: Yes.

MEMBER LOGUE: So most of this stuff is what you're getting from the science --

MR. CASTELLANOS: Yes.

MEMBER LOGUE: So you could be missing some of them, then.

MR. CASTELLANOS: Well, we've got, you know, people on the ground who are working on our behalf. But to your earlier point, it's really hard to go after a small --

MEMBER LOGUE: Well, it's going to cost you a good amount of time, yes.

MR. CASTELLANOS: And it's important that in our case we have to be working, and it could be an example of many of -- in our case, we happen to be working with independent reps.

MEMBER LOGUE: Yes.

MR. CASTELLANOS: To reconcile those things, it's a challenge.

MEMBER LOGUE: Okay. yes.

MEMBER LEECH: How would you find the guys who are -- I live on a back road, but they are on a road off the back road. I mean, you've got to know something about where to go look for them. You're not going to just find them.

MEMBER DENTON: Okay. Here we are. What are the best ways to get information derived from the cooperative agreements to small and very small establishments? I think we agree that we have to identify small and very small --

CHAIRPERSON ELFERING: Definitely.

MEMBER DENTON: -- that we're targeting.

CHAIRPERSON ELFERING: We have to know who our audience is first.

MEMBER LEECH: Oh, yes.

MEMBER DENTON: And then, through trade associations, extension agents, state directors, and technology providers.

CHAIRPERSON ELFERING: Yes. And you may even want to go -- well, I don't know if you would want to have it through the district office,

identifying who they are, or do you want -- or would it just be something that you would have in a --

DR. SYED: You can see what will happen with --

MEMBER DENTON: That's where we tried to capture FSIS.

CHAIRPERSON ELFERING: And I'm wondering if it should be at the district level, so it will be district managers also through --

DR. SYED: It goes from the district to the inspector and then --

CHAIRPERSON ELFERING: Very small and small.

DR. SYED: I just talked to my boss, Fred, before I came, and I did discuss with him about the PBIS. But we have -- internally we have to do some talking between Office of --

CHAIRPERSON ELFERING: Yes. Whether it be through PBIS or directly from the district manager. Is PBIS going to identify who is very small?

DR. SYED: Sure. That feedback that comes back we put in the computer. That's the normal

process.

Does Minnesota have any trade association at --

CHAIRPERSON ELFERING: There is a trade -- it's called MAMP, Minnesota Association of Meat Processors. And the majority of the very small plants belong to that. We're affiliated with AAMP. But do all of the states have a trade association?

MS. WARFIELD: I don't think that all of them have. Like some of the New England states I think are kind of on their own, and they rely on an AAMP membership. I'm not exactly sure how many states have.

CHAIRPERSON ELFERING: I'm not either.

DR. SYED: There are cities that are -- I think they are very small --

CHAIRPERSON ELFERING: And some are going to be more active than others, too. Some of them are -- have very active trade organizations, and some it's a meeting that they go to once a year and have a product show. That's all they do. Some are very active where they will get this information out to

their constituents.

MS. WARFIELD: And a lot of them rely on AAMP to supply them with information like, you know, we put out a newsletter, and then they take things from our newsletter and include it with their newsletter, because, you know, they rely on us for the information a lot of the time.

MEMBER DENTON: I have a question for my friend over here. One of the ways that we describe the -- the ways to get information to you is through technology providers. Do you object to that particular terminology?

MR. CASTELLANOS: Oh, no. That's fine.

MEMBER DENTON: Okay.

MS. TIPPENS: I mean, I'm happy that this was developed by Ag Research Service. We just developed it commercially, so --

MEMBER DENTON: But you would be the technology provider for it.

CHAIRPERSON ELFERING: Would the ARS be another area that could get information out? I mean, because they have some interaction with a lot of these

other organizations, too. So people with Agricultural Research Service, do they -- do they in turn -- would they be another source of data information on it?

MEMBER LEECH: My problem is I automatically assume that the research and the extension and the whatever are all hooked together, and in all places they may not be. So you may appropriate -- but if it's done right, you know, the ARAC is connected to the extension folks in helping to educate the agents and whatever.

But like I say, in some places I guess it may not happen. But that's one of the requirements for projects that might -- it does get transferred there.

DR. SYED: And the other question is -- and ARS is not the main lead for cooperative agreements. So we are more stressing on cooperative agreements.

CHAIRPERSON ELFERING: Okay.

DR. SYED: That's why we get information from them and communicate with the small plants, provide them --

MEMBER DENTON: I need a little help.

CHAIRPERSON ELFERING: Okay.

MEMBER DENTON: We were talking about information availability -- web, CD, etcetera -- and we've got a whole listing of things here that I'm not sure are our most effective ways of getting information communicated in local papers and those sorts of things.

MEMBER LEECH: I would disagree with you. I think putting things in local papers, there are a lot of people who are going to read those who aren't going to read the web. And so you make an announcement and send them to the web -- I really think that's how you would get it to some more people.

MEMBER DENTON: Okay.

MEMBER LEECH: And I'm thinking maybe the small town little papers.

MEMBER DENTON: And the reason why we're thinking in that -- in that vein is thinking about what you said about the first line of communication being your front-line inspector.

MEMBER LOGUE: Well, it should include

those, too, though.

MEMBER LEECH: Yes. I think that's the point, is that the multiple things that you do. One thing -- no one thing is the be all and the end all.

MEMBER LOGUE: So you need a range of sources for information.

MEMBER LEECH: And sending out a press release to all of the little papers is not an expensive proposition these days.

CHAIRPERSON ELFERING: Who would the press release come from? And I can only look at the -- you know, the small town paper that I recall would never publish anything like that.

MEMBER LEECH: The one I still read would publish it. It publishes everything they get from any government agency to this day. There are a lot of those little papers.

CHAIRPERSON ELFERING: Okay. And, you know, it's different -- different regions. In the region where I grew up, we were more interested in who got stopped for speeding than --

(Laughter.)

MEMBER LEECH: They put that in there, too.

(Laughter.)

MEMBER DENTON: Who got stopped for speeding and DWI.

(Laughter.)

MEMBER LEECH: Those go in there, too.

CHAIRPERSON ELFERING: I'm almost wondering if something that extension would put out might even be picked up even more.

MEMBER LEECH: It does. I mean, the extension would be -- you can send things to the extension, and then the extension puts it out, and then the agent puts it in their newsletter. That's another great thing.

CHAIRPERSON ELFERING: I think one of the most valuable resources we have I think we identified is the county extension agents. And I'm going to call them county extension educators more than --

MEMBER LEECH: Yes. A lot of states have moved to call them educators. Mine isn't quite that progressive, though.

MEMBER DENTON: Your turn.

MEMBER LOGUE: Okay. And we need to tidy this -- tidy up the information, don't we?

CHAIRPERSON ELFERING: Yes. We need to --

MEMBER DENTON: Could we read the items?

CHAIRPERSON ELFERING: Yes. We just -- we should have that in the first -- very first part.

MEMBER LEECH: Now, that consistency we were -- we were really talking about some joint --

MEMBER LOGUE: That was just when we were trying to say how would we --

CHAIRPERSON ELFERING: And I think that would be -- kind of go hand in hand with the very beginning of the contact, right? With that first initial contact? If it's going to be from an inspector, just to make sure that -- just to make sure that it's the same information going to --

MEMBER LEECH: Right.

CHAIRPERSON ELFERING: -- federally-inspected plants and state-inspected plants.

MEMBER LEECH: Right.

MEMBER KOWALCYK: Yes. As long as it can

be traced back to the ultimate source.

MEMBER LEECH: Right.

CHAIRPERSON ELFERING: Yes, and it would be.

MEMBER LEECH: And I think the other thing that we had in that was readable, understandable, in real people language, not --

MEMBER LOGUE: Layman's terms.

MEMBER DENTON: Simple, powerful message in layman's terms.

CHAIRPERSON ELFERING: I thought we had -- we had that up there somewhere.

MEMBER DENTON: I think it's in question number 2.

CHAIRPERSON ELFERING: Yes.

MEMBER LEECH: Oh, okay.

MEMBER DENTON: Front-line inspectors thinking -- that's what is --

MEMBER LEECH: That's one of the things that we questioned. I don't think we need that language.

MEMBER LOGUE: No, that needs to come out.

MEMBER LEECH: Because we put the -- the solution to that is presenting it so that they'd understand and do their job better.

MEMBER DENTON: Yes. District disseminating to you the front-line supervisor and --

DR. PATEL: Safety inspector.

MEMBER DENTON: Yes.

CHAIRPERSON ELFERING: No, we want to keep that in there.

MEMBER LEECH: Some of them we may need to move -- might move around. They aren't in the right place. But the idea is we'd have to look --

CHAIRPERSON ELFERING: And you can just cut out that "and getting info out," because you're almost just saying that twice.

MEMBER DENTON: And the next line right after that, because we've already referred to the front-line inspectors.

CHAIRPERSON ELFERING: What's the next one? Presenting --

DR. PATEL: New technology.

CHAIRPERSON ELFERING: Oh, new technology.

Okay. You are living in acronyms too much.

(Laughter.)

DR. PATEL: That's a new technology thing.

MEMBER DENTON: We don't need that line, do we?

CHAIRPERSON ELFERING: Presenting --

MEMBER LEECH: That was a strategy for getting the front-line inspector to do it.

CHAIRPERSON ELFERING: Yes, right.

MEMBER LEECH: However whether it needs to go somewhere else -- that was the point that was.

MR. CASTELLANOS: That may fall better under question 2 as far as --

CHAIRPERSON ELFERING: Yes.

MR. CASTELLANOS: -- getting information out there.

CHAIRPERSON ELFERING: Yes.

MEMBER LEECH: Go after that. Keep going.

CHAIRPERSON ELFERING: What is the retail exempt?

DR. SYED: Are we going to put EAIOs, or not?

CHAIRPERSON ELFERING: Yes. I think so, yes.

DR. SYED: Because they were here.

CHAIRPERSON ELFERING: I think anyone -- anyone who goes to a --

DR. SYED: They might have more resources with that.

CHAIRPERSON ELFERING: Any inspection personnel that goes to a plant, whether it be a circuit supervisor, interview supervisor, EAIO, IIC, whatever.

MEMBER LEECH: See those two lines at the top, the retail-exempt and state-inspected? We need them out, too, I think. They were just thoughts.

CHAIRPERSON ELFERING: Yes, because we're not going to be --

MEMBER LEECH: They don't mean anything here. At least I don't think so anyway.

CHAIRPERSON ELFERING: The only thing is is you have -- if we're going to focus strictly on what is under continuous inspection, or if we're going to focus on food safety, should this information also

go to people who are retail-exempt? We have facilities that are retail-exempt that are producing more product than a plant that's under continuous inspection.

MEMBER LEECH: Okay. Well, then we ought to have a strategy for --

CHAIRPERSON ELFERING: But is that something that FSIS wants to do? Is this information only for plants that are under inspection? From a standpoint of education and food safety, it should be made available to --

DR. SYED: I think we need to put that in.

CHAIRPERSON ELFERING: -- retail-exempt and custom-exempt.

MEMBER DENTON: That goes back up in number 1, you think? Our first question?

CHAIRPERSON ELFERING: Yes. Yes. I think we should be looking at also inclusion of those that have exempted operations only, such as retail- and custom-exempt. We just had an e. coli outbreak last year with a custom-exempt plant with its -- it's a bicycle trip across the street where people take

pledges and then ride across the state.

And there was a church that had a pasta dinner. The farmer had custom-exempt meat that they felt that they had too much, so they had donated some of it to their pastor. The pastor decided he would be able to use it in this -- in this pasta dinner, because they charged the people riding the bikes.

And I think there were pretty close to 20 people who became ill. What happened is is they microwaved the ground beef, and then threw it into the spaghetti sauce, and really never heated it up thoroughly. All these people are in good health, so nobody really became real significantly ill.

But could you imagine -- I mean, if you're going to get diarrhea, would you want it on a bicycle trip across the state? So, I mean, there's -- we find that more of our e. coli issues are from custom-exempt product than it is from inspected. So I think we need to really focus on the food safety part of it.

MEMBER LEECH: Yes.

CHAIRPERSON ELFERING: Not just inspection.

MEMBER LEECH: Yes.

MEMBER KOWALCYK: What parties would communicate that information to those retail-exempt?

CHAIRPERSON ELFERING: Well, the same with inspectors in the state programs. They're going to be going into those plants every quarter. I don't know how often FSIS goes into a custom-exempt. They have a risk -- they have a risk category that they assign.

DR. SYED: One to five.

CHAIRPERSON ELFERING: Yes. I would say most of them are going to be quarterly.

DR. SYED: Yes.

CHAIRPERSON ELFERING: And then, the retail-exempt would be any government agency that does inspections.

DR. SYED: And state people, because we don't have inspection. I think because in big cities, in this very small plant -- this is a very small plant, poultry that is -- there will be a wall separating them. In a big city, in New York City, you have different -- in Brooklyn, you can go back for the retail exemption, you've got custom, too, and you've

got --

MEMBER LEECH: Well, and that's why the ongoing public education about how to handle products appropriately and cook it thoroughly and what to do and not to do is -- again, we're talking about public safety. That's the ongoing need to do.

My brother-in-law is an extension agent, and when they have the 4-H show now -- they try to sell all those cattle. Well, my husband works at a company where they've had some of that beef, and they love it. So it gets taken from one county to another up the valley where they -- and then they transport it to people.

I mean, that's an example of a custom thing that didn't go to traditional farm people that, you know, we may all think about. They go to some people in the city, you know, who had an opportunity to buy, you know, 4-H-raised beef. That kind of stuff still happens. And so educating the public about how to handle that is always so important.

CHAIRPERSON ELFERING: So they should actually -- that should actually be in the audience,

who the targeted audience is.

MEMBER LEECH: Yes. I mean, because, really, the -- and, again, that's where educating the public about the technologies as they come along, and then how to properly handle it -- it really depends on whether it's something there to -- but, obviously, I mean, an extension -- you know, if you've got folks that you're trying to reach --

CHAIRPERSON ELFERING: Do you want to put something like "and could include"?

MEMBER LEECH: -- community groups and --

CHAIRPERSON ELFERING: something like "and could include"? Information availability -- web, CD.

MEMBER DENTON: And could include -- yes.

CHAIRPERSON ELFERING: And then, maybe even put in "call them" after "could include."

MEMBER DENTON: Yes.

CHAIRPERSON ELFERING: And then, push that into the next line, and then line the rest of those --

MEMBER LEECH: Line it up with the others. No, put local --

DR. PATEL: Okay.

CHAIRPERSON ELFERING: You can have them as -- even as bullets, but you don't have to mark them as bullets but just have them as -- each one a separate line probably.

DR. PATEL: Oh.

MEMBER LEECH: I would indent all of them.

DR. PATEL: Oh, okay.

CHAIRPERSON ELFERING: Yes, that might work better.

MEMBER LEECH: I would make "local newspapers" look like the others do, instead of changing all of them.

DR. PATEL: Okay. Do you want to keep that in the report? That's the only one that's --

MEMBER DENTON: So we indent those.

CHAIRPERSON ELFERING: Okay. Have we got that one pretty much taken care of, do you think?

MEMBER LEECH: It looks good to me.

CHAIRPERSON ELFERING: Okay. That's done, then.

Okay. Simple, powerful messages. That's in bold. Information --

MEMBER DENTON: We stuck "layman" in there, didn't we?

CHAIRPERSON ELFERING: Yes. Nuts and bolts information in layman terms.

MEMBER LEECH: Yes.

CHAIRPERSON ELFERING: Oops. All caps there.

MR. CASTELLANOS: It happens.

(Laughter.)

CHAIRPERSON ELFERING: Maybe it was supposed to be like that.

MEMBER DENTON: And we had -- I had something about our resource contact. I had a note jotted down to the side and how to -- how we effectively present information.

MEMBER LEECH: Yes, use the resource contact.

MEMBER DENTON: Yes. A listing or a designation of resource contact people that might be able to further assist with this if we don't -- if we don't get it done.

CHAIRPERSON ELFERING: In this section

here? Is that --

MEMBER DENTON: How does FSIS effectively present scientific information to small and very small businesses? Simple, powerful messages in layman's terms with resource contacts is the way I had it in my --

CHAIRPERSON ELFERING: Okay.

MEMBER DENTON: -- in my thinking.

CHAIRPERSON ELFERING: Do we want to put that as just one thought --

MEMBER LEECH: Yes.

CHAIRPERSON ELFERING: -- instead of having it as a separate -- simple, powerful messages in layman's terms, and take out the nuts and bolts? We try to avoid nuts and bolts in meat processing plants.

(Laughter.)

MEMBER LEECH: And I would make that another line, because whatever message goes to any of the resource contacts, or one of them, but all of these others are, too.

MEMBER DENTON: Contact information. Does

that make sense?

MEMBER LEECH: Yes.

CHAIRPERSON ELFERING: Yes.

MEMBER LEECH: I'm not sure those next three -- they don't make a lot of sense right now.

MEMBER DENTON: Unless it's a research demonstration of some sort.

MEMBER LEECH: Yes, that's -- yes.

MEMBER DENTON: I think it was something that --

CHAIRPERSON ELFERING: Yes, right. The research --

MEMBER DENTON: -- Catherine said.

MEMBER LEECH: Yes. And that way you can --

MEMBER LOGUE: Well, I talked at one point about -- what did I say, getting -- getting some of these small businesses to try and match them up with the researcher.

CHAIRPERSON ELFERING: Just take out the "the," too, probably.

MEMBER LOGUE: There's a comma.

CHAIRPERSON ELFERING: There's a comma at the end of "universities"? Just take that out. All right. Cooperative agreements, collaborative --

MEMBER KOWALCYK: Does that get to what we talked about earlier about the cooperative agreement requiring that the researcher present the results?

MEMBER DENTON: I don't know what we were doing with that language.

MEMBER LOGUE: Isn't that what you were saying about using universities and collaborating like with the processors to find out what they need?

MS. WARFIELD: As a first step kind of a thing?

MEMBER LOGUE: And then also -- you were right, too, because we also talked about as a way to publicize this that that would be part of the cooperative agreement requirements that if an institution got some funding that they had to go back and use it for part of their outreach.

MEMBER KOWALCYK: Can you explain how you would -- how people actually --

MEMBER DENTON: What were you talking

about -- the cooperative agreement thing?

MEMBER LOGUE: It becomes part of that agreement. You know, and a cooperative agreement is money coming down, so you write it in the contract that you have to do this.

CHAIRPERSON ELFERING: Yes. When they get a cooperative agreement -- let's say I get one of these cooperative agreements, and I develop some technology and rapid testing for listeria. Part of my proposal have to be that if I get this cooperative agreement grant, I've got to be able to go out and do something with it --

MEMBER LOGUE: Right.

CHAIRPERSON ELFERING: -- with the industry.

MEMBER LOGUE: And you have to be able to go out and publicize it. In other words, when you get the technology, yes, it works and --

CHAIRPERSON ELFERING: But then, how far do you advertise it, though?

MEMBER LOGUE: Well, that's --

CHAIRPERSON ELFERING: Or do we allow --

or do we have USDA --

MEMBER DENTON: What is the requirement that's placed on the collaborators and the cooperative agreements now with regard to publicizing the information?

DR. SYED: They have to -- because once we pay the grant, we own it.

MEMBER DENTON: Yes.

DR. SYED: And, therefore, it's how we use it.

MEMBER DENTON: Yes.

DR. SYED: They don't have any --

MEMBER DENTON: But you don't place an obligation on them to be part of that communication process.

DR. SYED: Once it's in a deliverable, that's ours. Then, we can do whatever we want with it.

MEMBER DENTON: Okay.

MR. CASTELLANOS: There should be some contribution to --

MEMBER DENTON: Would it be a more

appropriate thing to do to require these collaborations on the cooperative agreements to have some role in communicating?

DR. SYED: You can -- when a proposal comes in, we put that in.

MEMBER DENTON: Can we recommend --

CHAIRPERSON ELFERING: Let's recommend that, yes. Definitely.

DR. SYED: We can put that recommendation in.

MEMBER DENTON: Collaborators and cooperative agreements. Had it. Just lost it. Did somebody capture that? It fell out over here.

MR. CASTELLANOS: Provision cooperative agreements to require --

DR. SYED: Dissemination.

CHAIRPERSON ELFERING: There you go.

MS. TIPPENS: And I think most companies would want the opportunity to do that.

MEMBER DENTON: Yes. That puts the --

MR. CASTELLANOS: It makes it unequivocal, too. So you can make sure that nothing gets lost in

the translation.

CHAIRPERSON ELFERING: And I would think most would want to do that.

MR. CASTELLANOS: Absolutely.

DR. SYED: Yes, because that's --

CHAIRPERSON ELFERING: Like you said, you know, if a university -- if they're going to do it, you're going to want to publicize the fact that you've developed some --

MEMBER LOGUE: It's part of our requirement for this. You need to pretend you're -- or, as you said, you can be on the --

MEMBER KOWALCYK: There can be quite a bit of residual benefit from having that large --

MEMBER LOGUE: Oh, yes.

MEMBER KOWALCYK: -- communicating at very high levels within the agency to say this is the technology and this is what it can do.

MEMBER LOGUE: You know, you're getting the -- you're not getting it from the agency. You're getting it from the guys on the ground.

DR. SYED: The individuals. And also,

2005 is coming. We can propose it by -- we can put those things in.

DR. PATEL: Applications? Are we using that to -- somehow they should disseminate the applications.

MEMBER KOWALCYK: You may be starting another sentence and saying part of -- this would also require recommendations for implementing the new technology.

MEMBER DENTON: All right. Here we are.

MEMBER LOGUE: Oh, I know what that one is. That's from when we were talking about getting the small business guys to tell us what their concerns were, and then trying to marry them with somebody at a university. So, in other words, then, that maybe -- remember I mentioned this in terms of an advisory board or --

MEMBER DENTON: Right.

MEMBER LOGUE: -- not just an advisory board but a situation where a small business has to -- "We want to find a way to reduce listeria. How can you help us?" kind of thing.

MEMBER DENTON: Okay.

CHAIRPERSON ELFERING: So that might drive the actual project.

MEMBER LOGUE: Yes. That you would have a driver, as you say -- this small company would really like to do this, is willing to go in on a collaborative agreement, and here's our problem -- we want to get rid of listeria. Would you be willing to work with me to come up with a way to do it?

MEMBER DENTON: Okay. So how would you modify that to capture that?

MEMBER LOGUE: I don't know. Maybe saying something along the lines of going to the -- going to the small and very small establishments and working with them to address their concerns.

CHAIRPERSON ELFERING: Maybe that's a good spot for a lot of these trade organizations. Some of the trade organizations will be able to recommend to -- maybe even recommend to USDA. When they put out their announcements, here are some things that the industry needs.

MEMBER LOGUE: Yes, that's true.

CHAIRPERSON ELFERING: So that when -- when they're putting together some type of a proposal, if the industry really feels it needs something for listeria control, or whatever, that that would be something the -- someone who is writing the cooperative agreement, the proposal, would actually be focused on, because that's something that industry truly needs.

So, you know, there is -- it was suggested, but I don't know if it should come from the trade organizations. They would probably be best to be able to gather some of that information.

MS. WARFIELD: I know we work with some of our members on handling problems like that. You know, they'll call and say, "Hey, I've got this going on. What are your recommendations?" Or, "Who can I go to for help?" So that's a common thing for us to deal with.

CHAIRPERSON ELFERING: And would the tech center have data on questions -- you know, how many people are calling in and saying, you know, "I need to have some guidance on XYZ"? And if you're getting 100

questions on that --

DR. PATEL: So we put all of those questions answers in some --

CHAIRPERSON ELFERING: Yes. We could identify what the industry needs just by what questions are being asked.

DR. SYED: Are you going to put that in?

DR. PATEL: Yes, that's a good recommendation.

MEMBER LOGUE: Developing a database for issues?

MEMBER DENTON: Can this exercise effectively present scientific information?

CHAIRPERSON ELFERING: Yes. We're going to get --

MEMBER DENTON: Or go into the -- yes.

CHAIRPERSON ELFERING: Let's put that as a footnote. Let's put something like that as a footnote is is that, you know, for all of these different technologies, we really should be looking at -- the FSI should really be looking at information that they already gather to see if they can determine what is

truly needed by the small -- for the small industry, or utilizing data that they already gather.

MEMBER DENTON: Yes. That's probably more appropriate, utilize data already in hand to assess the needs of small and very small -- to assess the needs -- sorry. Isn't that where we're going? Should we take out "issues/concerns of universities" on that?

MEMBER LOGUE: Yes, probably can.

DR. SYED: We can put it in the administrator website, state website, or something like that, because then we are identifying one state.

MEMBER LEECH: Well, any state, yes. I mean --

MEMBER DENTON: Do this job better. I understand the concept we're getting at there. There's a better way to state that.

MEMBER LEECH: Using that inspector as a way to sell it as well, by saying, "Hey, if you can sell us," because it's going to make his job easier. So we were just using them as a vehicle or a tool for selling. Selling is not the word, but you know what I'm trying to say.

MEMBER KOWALCYK: Communicating.

MEMBER LEECH: Or communicating.

MEMBER KOWALCYK: Benefits including technology through field offices or --

MEMBER DENTON: Yes. Communicate the new technology to the inspector.

MEMBER LEECH: To inspector, explaining how it may make his work/job easier.

MEMBER KOWALCYK: Either that or maybe not -- I mean, that verbiage -- explaining the benefits of the technology.

MEMBER LEECH: Right. Well, yes, you can. But I don't know if that carries through the idea of -- that you've got to sell it to the inspector for their own benefit, as well as for the ultimate. If you don't put that in there, then they don't have an incentive to do it.

MR. CASTELLANOS: It's like you said, sell it to the inspector as a benefit for their use.

DR. PATEL: It's the program. On my computer it has --

(Laughter.)

-- auto correct.

MEMBER LEECH: Where it says "Minnesota website," you could do state --

DR. PATEL: That would be much better.

MEMBER LEECH: -- state and/or university. Because, I mean, I think you want to go through your state government as well as, you know, anything that you can get through university websites as well, as you've said -- again, multiple strategies for all this stuff.

You're going to get to your county extension agent through your state leader network. So you could say county extension agents via the state leader network.

I think that you should say state HACCP coordinator and it -- if contact is something different, but I don't know that you need to say the rest of that is --

MEMBER LOGUE: State leader network and the --

MEMBER LEECH: Yes, they might be different. They might be different.

MEMBER DENTON: Yes. Coordinating with --

MEMBER LEECH: And, again, I'd put both of them. Everybody needs to know. Have we already got that?

CHAIRPERSON ELFERING: Where are we at?

MEMBER DENTON: We're on that first section in part number 3, that first statement, first line. Does that capture what we were saying?

MEMBER LOGUE: Yes. I'm not sure about the receivables thing.

CHAIRPERSON ELFERING: Do you mean that listing at the state -- well, I think one of the things we want to put in there, that we've got the HACCP coordinator and contact -- should be in there. Unless you would put up there something like listing information --

MEMBER DENTON: I think you mentioned this as a list that the federal-state relations has that captures all of the small and very small. Is that right?

CHAIRPERSON ELFERING: Yes. I would just use the -- again, use the information for state

programs from federal-state relations, the list of state-inspected establishments. And then you're going to have the FSIS/PBIS data. And then, so it would just be -- instead of -- maybe we want to put federal-state relations for state-inspected facilities.

But if we're going to go in with -- that this should go out to more than just official establishments, it should probably go to food inspection agencies also.

MEMBER LEECH: Yes.

CHAIRPERSON ELFERING: Maybe "and other food inspection agencies?

MEMBER LEECH: That sounds good.

CHAIRPERSON ELFERING: And, actually, FDA maintains a database of who those would be. So I didn't understand all that -- listing the information at the state -- what that is.

MEMBER DENTON: I think somehow we've got "state" in there twice.

CHAIRPERSON ELFERING: Yes.

MEMBER DENTON: Because you talk about state and federal relations.

CHAIRPERSON ELFERING: Or providing -- providing the information, or how -- we actually want to try to figure out if -- if they don't have a trade organization, how are we going to get them this information? So we've got -- again, we've identified who they are, and I think we've almost accomplished that by our first part is is that the front-line inspector would be getting out that information initially.

MEMBER LEECH: And kind of referring them to the in-depth education source as --

CHAIRPERSON ELFERING: But then, also providing the information to universities, county extension agencies, state HACCP coordinator and contacts, and other food inspection agencies. Or you can put two other food inspection agencies, because I think we've already identified who these all are.

MEMBER LEECH: Yes.

CHAIRPERSON ELFERING: I mean, we know -- we've already established how the information was going to get out there initially, so this is just --

MEMBER LEECH: So you're saying get rid of

the last two lines there, the last -- the second line there.

CHAIRPERSON ELFERING: Yes. And then, eliminate that, the state FS -- the -- yes, keep going, keep deleting until you get to "university."

MEMBER LEECH: Do we want to say state and university?

CHAIRPERSON ELFERING: Yes.

MEMBER LEECH: So keep going through "and." And after "and," go -- get rid of that and make another bullet.

CHAIRPERSON ELFERING: Yes. State or university website, county extension agents, HACCP coordinators and contacts, and then cooperative agreement. I would say that we don't have in there at all. That could be -- that one can be eliminated. And then, this would be the footnote.

MEMBER LOGUE: Well, what were we doing with the one we just deleted? We were making it part of the cooperative agreement that they also have to have it publicized.

CHAIRPERSON ELFERING: Well, I think

that's what we --

MEMBER LOGUE: Okay. Right.

MEMBER LEECH: What about the --

CHAIRPERSON ELFERING: No. The footnote should be at that -- no, I think we can eliminate that whole thing.

DR. PATEL: Oh, okay.

CHAIRPERSON ELFERING: That footnote part until we get down to the bottom.

DR. PATEL: Just delete it?

CHAIRPERSON ELFERING: Yes, delete it. And then, leave the next line. Nope, not that one, the one above it.

MEMBER LEECH: You were hitting the down key, instead of the up.

DR. PATEL: Up, right?

MEMBER LEECH: Yes.

CHAIRPERSON ELFERING: A little bit too far there. 2003 -- eliminate that line.

MEMBER LEECH: Yes.

CHAIRPERSON ELFERING: And then, that should be as kind of a footnote is is that FSIS needs

to utilize the existing information to assess the needs.

MEMBER LEECH: Do we need to specify what existing information we're talking about? Or they will know?

CHAIRPERSON ELFERING: No. I think we should put request from trade organizations and questions that are received by the technical services center. Yes. Maybe just turn that "request" into a "requests," and it doesn't have to be capitalized.

DR. PATEL: Oh, okay.

CHAIRPERSON ELFERING: Or maybe you want to put -- maybe put it as a bullet. Put it as a bullet instead.

DR. PATEL: Oh, okay.

MEMBER LEECH: That part you just wrote, not the "to assess the needs," right?

CHAIRPERSON ELFERING: Yes.

DR. PATEL: Like this?

CHAIRPERSON ELFERING: Yes.

MEMBER LEECH: And then, put the -- "to assess the needs of SVS" needs to go back up in that

first line.

CHAIRPERSON ELFERING: Yes, that's right.

MEMBER LEECH: All right. But it's request -- and it should be plural, shouldn't it?

CHAIRPERSON ELFERING: Yes.

MEMBER LEECH: From trade associations and --

CHAIRPERSON ELFERING: Yes.

MEMBER LEECH: -- or make another line. I don't know.

CHAIRPERSON ELFERING: Yes. And -- or, no, you could put -- or instead of -- don't put an "and" in there yet. Go back and put a comma, and then after "received at TSC" put "and any other information that's available to the agency."

MEMBER LEECH: Yes. After TSC.

CHAIRPERSON ELFERING: Yes. And then put "and any other information gathered by the agency." I think we're just missing -- yes.

MEMBER KOWALCYK: Put a footnote on the top one -- do we need -- do you think we need to qualify it as technological needs for small or very

small plants?

CHAIRPERSON ELFERING: Yes. What was the --

MEMBER KOWALCYK: After -- before "needs" would be the technological -- yes, right, on that line. Utilize existing information to assess the technological needs of the --

CHAIRPERSON ELFERING: Technological needs, yes.

MEMBER LEECH: No, that's right.

CHAIRPERSON ELFERING: Yes.

MEMBER LEECH: Try putting a comma after -- in TSC, after C, and see if that gets rid of your bullet.

MEMBER DENTON: What's going to happen with request from trade associations, questions received --

MEMBER LEECH: Oh, that's why that was showing up as being --

MEMBER DENTON: And any other information gathered by FSIS.

MEMBER LEECH: Yes.

MEMBER DENTON: What are we doing?

MEMBER LEECH: That is -- those are examples of -- okay. So you could say, for example --

CHAIRPERSON ELFERING: Yes, for example. Yes, perfect.

MEMBER LEECH: Comma, and lower case R.

CHAIRPERSON ELFERING: Perfect.

MEMBER DENTON: Eloquence like that I have never seen.

(Laughter.)

MEMBER LEECH: And you could make it connect and you could just leave it separate. We've made it separate, but you could just -- I think now we've done the "for example," two spaces, and then, yes, bring that sentence up.

MEMBER DENTON: Are you satisfied with your report, Captain?

CHAIRPERSON ELFERING: I think -- are we going to have the ability to work on this in the morning again?

MEMBER LEECH: Yes. The whole group will work on it.

CHAIRPERSON ELFERING: Okay. So can we get copies of this?

DR. PATEL: That's fine. I've got it here, or I can --

CHAIRPERSON ELFERING: And save it to a disk?

DR. PATEL: Yes.

DR. SYED: Can you bring it first thing in the morning, or how are you --

CHAIRPERSON ELFERING: Can you print it here? There's a printer over there. And we can take it with us.

MEMBER LEECH: If you save it on that disk, I can take it and --

MEMBER DENTON: Can you get it on paper?

CHAIRPERSON ELFERING: I just saw Mary Cutshall out there and I said, "We finished our report. All we put in there is, 'Call Mary.'"

(Laughter.)

MEMBER DENTON: I'm surprised you're still walking.

(Laughter.)

CHAIRPERSON ELFERING: She did take a swing at me, but I ducked.

MEMBER DENTON: You ducked.

MEMBER LEECH: Are you finished with this?

CHAIRPERSON ELFERING: Yes. University people, they just want to kind of take over.

(Applause.)

We can go off the record.

(Whereupon, at 4:42 p.m., the proceedings in the foregoing matter were adjourned.)