

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE

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NATIONAL ADVISORY COMMITTEE ON
MEAT AND POULTRY INSPECTION

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SUBCOMMITTEE NUMBER 2
USING RISK IN SLAUGHTER OPERATIONS

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October 12, 2006
2:30 p.m.

USDA South Building
Conference Room FM7
1400 Independence Avenue, S.W.
Washington, D.C.

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University of Arkansas

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MS. SANDRA B. ESKIN
MR. MIKE FINNEGAN
DR. JOSEPH J. HARRIS
DR. IRENE E. LEECH
MR. CHARLES M. LINK

FSIS:

MR. CHRISTOPHER BRATCHER
MR. PHILIP DERFLER
MR. LOREN LANGE
MR. STANLEY PAINTER
MR. BRYCE QUICK

ALSO PARTICIPATING:

MS. ANDREA BROWN
MR. TONY CORBO
MR. BRIAN COVINGTON
MS. ABBY DILLEY
MS. CHERYL GOLDMAN
MR. DENNIS JOHNSON
MR. STEVE PRETANIK
MR. SCOTT STILLWELL

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

2 (2:35 p.m.)

3 DR. DENTON: What I'd like to do first is
4 have a little roundtable introduction starting with
5 the folks that are on the Subcommittee and then we'll
6 go around the outside of the room with the
7 introductions that are sitting in, and then I'll
8 explain just about the ground rules of how we're going
9 to conduct the discussion this afternoon.

10 I'm James Denton with the University of
11 Arkansas, Chair of the Subcommittee on Using Risk in
12 Poultry Slaughter Operations.

13 MR. FINNEGAN: Mike Finnegan, Montana.

14 MS. ESKIN: Sandra Eskin, I'm hoarse, and
15 I'm a public policy consultant for consumer groups.

16 MR. ELFERING: Kevin Elfering. I'm the
17 Director of the Dairy and Food Inspection Program in
18 Minnesota, and I'm also an Adjunct Professor at the
19 University of Minnesota.

20 DR. LEECH: I'm Irene Leech, and I am here
21 representing the Virginia Citizens Consumer Council, a
22 state and local consumer group, and I also teach

1 Consumer Affairs at Virginia Tech.

2 MR. LINK: Charles Link. I'm mainly with
3 technical services for Cargill particularly focused on
4 turkey slaughtering processing.

5 MR. PAINTER: Stan Painter. I'm Chairman
6 for the National Joint Council of Food Inspection
7 Locals.

8 DR. BRATCHER: Chris Bratcher, President of
9 National Association of Federal Veterinarian. I
10 started as supervisor and been a circuit supervisor in
11 two different districts, used to be the poultry
12 veterinarian trainer. I've trained some people like
13 Ken Peterson and obviously I did --

14 (Laughter.)

15 DR. BRATCHER: -- and some of those people,
16 and I just screwed up I guess.

17 DR. HARRIS: Joe Harris. I work for
18 Southwest Meat Association.

19 DR. DENTON: Okay. Thank you.

20 MR. CORBO: Tony Corbo from Food and Water
21 Watch.

22 MR. LANGE: Loren Lange with FSIS, Office of

1 Public Health Science.

2 MR. QUICK: Bryce Quick with FSIS.

3 MR. DERFLER: Phil Derfler, FSIS.

4 MR. PRETANIK: Steve Pretanik, National
5 Chicken Council.

6 MS. GOLDMAN: Cheryl Goldman (ph.). I work
7 for Meat and -- of Australia.

8 MS. DILLEY: Abby Dilley, RESOLVE.

9 MS. BROWN: Andrea Brown, American
10 Association of Meat Processors.

11 MR. JOHNSON: Dennis Johnson, Olsson, Frank
12 and Weeda.

13 MR. COVINGTON: Brian Covington, Keystone
14 Foods.

15 MR. STILLWELL: Scott Stillwell, Tyson
16 Foods.

17 DR. DENTON: Thank you. What we are going
18 to try to accomplish this afternoon is to address the
19 questions that were outlined in the PowerPoint. Phil
20 expanded those differently than what he had presented
21 them in the three page document that we were provided
22 I think that covered the same topics. What we want to

1 try to do is approach these in sequence. Folks that
2 are not part of the Subcommittee can be recognized to
3 ask questions or to make brief comments. We want to
4 try to limit anything to about three minutes so that
5 we can stay on schedule, but with that being said, we
6 will try to move into the questions.

7 MS. ESKIN: I have a request, and I wonder
8 if we can do this very briefly. If someone can give
9 us a description of exactly how slaughter inspection,
10 and let's stick to poultry since that's what we're
11 talking about here, how it works, meaning in terms of
12 what the inspectors do, because I'm not sure I
13 necessarily have the complete picture in order for me
14 to respond helpfully, unless I understand.

15 DR. DENTON: All right.

16 MS. ESKIN: Not to take hours, but just
17 something.

18 DR. DENTON: Right. With that, I'll ask
19 Chris as a trainer if he can briefly describe what
20 happens with inspection in a poultry slaughter
21 establishment.

22 DR. BRATCHER: Well, I think what we really

1 need to know is what happens in the in plants? Well,
2 because I think that's where we're headed and, you
3 know, isn't that somewhat similar to -- I mean I
4 haven't seen anything that shows exactly what this
5 risk-based inspection is going to be like.

6 DR. DENTON: No, no. She's talking about
7 what happens now.

8 MS. ESKIN: Traditional.

9 MR. ELFERING: What's traditional and --

10 MS. ESKIN: Traditional, and then we can
11 talk about that.

12 DR. DENTON: Traditional inspection. I'm
13 sorry. I didn't clarify that.

14 DR. BRATCHER: I'm sorry. Well, traditional
15 now is that if you start out with the staffing aspect,
16 on-line inspectors at each station, many of our plants
17 are either SIS [Streamline Inspection System] or
18 they've converted to Meyn Maestro [High Speed Poultry
19 Evisceration System] or NELS [New Line Speed
20 Inspection System].

21 MS. ESKIN: Which are?

22 DR. BRATCHER: New line inspection system.

1 NELS is four inspectors on line per line. The Meyn
2 Maestro is four inspectors --

3 UNIDENTIFIED SPEAKER: Three.

4 DR. BRATCHER: Or three on line. That's
5 right. Four inspectors on the Meyn Maestro. We
6 usually have -- in those configurations, they usually
7 have two lines with eight on-line inspectors and off-
8 line inspectors that rotate doing floor duties, and
9 then a veterinarian who oversees those activities.

10 COURT REPORTER: I have to pause you for one
11 minute. This equipment picks up cell phones. If
12 they're on, it clatters. I'm going to have to ask you
13 to turn them off.

14 DR. DENTON: I'm glad you brought that up
15 now.

16 DR. BRATCHER: Do you want me to draw that
17 or -- I mean it's pretty simple, and depending on the
18 amount of processing I guess after the chiller I guess
19 would depend on the amount of off-line people you
20 have. So you could have GS-8s and GS-9s off-line
21 inspectors, and you would have a veterinarian. There
22 are some plants that are huge plants like Foster

1 Farms, where there will be a number of off-line, a
2 number of on-line and they can have several different
3 lines running at the same time with different start
4 times and it'll be a mess but most of the conventional
5 plants now are going to two lines, Meyn Maestro, and I
6 think that's what Tyson's has gone to in most of its
7 facilities.

8 MS. ESKIN: And is it accurate to say that
9 on-line looks at the carcass, off does other stuff?

10 DR. BRATCHER: Exactly.

11 MS. ESKIN: And at the very least, is it
12 fair to say at least one on-line inspector. If
13 there's two lines, obviously there's more. It depends
14 on volume, but obviously there's one at the very
15 least.

16 DR. BRATCHER: There's one off-line
17 inspector in those plants that's doing -- and it will
18 be eight on-line inspectors. Okay.

19 MR. LINK: In a turkey plant, there might
20 only be one on a line or time because of line speed.

21 MS. ESKIN: Because of line speed.

22 MR. LINK: It's going strictly based on the

1 volume.

2 MS. ESKIN: Yeah, that's what I figured.

3 DR. BRATCHER: Line speed and size and class
4 of birds.

5 MR. LINK: It's either going to be one, two,
6 three or four on line.

7 DR. BRATCHER: Yeah, yeah.

8 MR. LINK: In a very small plant, you're
9 going to have an on-line inspector, and they're going
10 to do the off-line work as well.

11 MS. ESKIN: Right. And now under the HACCP
12 system, that off-line inspector is doing the HACCP
13 stuff?

14 DR. BRATCHER: Yeah, they're doing all the
15 HACCP stuff plus what we call consumer -- under
16 consumer protection.

17 MS. ESKIN: The quality --

18 DR. BRATCHER: Yeah, pre-chills and post-
19 chills and zero tolerance test and some of those
20 things. So they're doing a number of tasks and some
21 of those are generated. Some of those are
22 requirements they have to do every day, their own

1 scheduled tasks that they are required to be done
2 every day.

3 DR. DENTON: Thank you, Chris.

4 MR. ELFERING: And then, Mr. Chairman, the
5 whole question is, is utilizing these off-line
6 inspectors in other ways other than what they're just
7 doing based on risk.

8 DR. DENTON: Yes, as I --

9 MR. ELFERING: If the risk is higher on-
10 line, that they would be doing work on-line as well
11 or --

12 DR. BRATCHER: I mean mostly it's on-line.

13 MS. ESKIN: But could you move --

14 MR. ELFERING: What is the -- if we're
15 identifying a higher risk on-line, then you would use
16 the offline factors to do a further assessment of the
17 on-line --

18 UNIDENTIFIED SPEAKER: I don't know how you
19 would get them on the line.

20 DR. DENTON: Chris, do you have --

21 DR. BRATCHER: The way the line is
22 configured, you wouldn't be able to -- there's not a

1 place to put them on-line.

2 DR. DENTON: But this whole purpose of this
3 is can you apply risk-based inspection in a slaughter
4 system? So it's going to be utilizing only your on-
5 line inspectors.

6 DR. BRATCHER: Or if the off-line people
7 determined that the process was out of control, then
8 they could make determinations about slowing the line
9 down. The whole key to inspection on-line is how much
10 time you have per bird to make a determination.

11 MR. ELFERING: And isn't that presently
12 done?

13 DR. BRATCHER: Yes, but it's, it's done with
14 the off-line person. If you have additional
15 resources, they could be doing other checks, other
16 than just looking -- we have a presentation check
17 which strictly looks at the ability to manipulate the
18 viscera and the flap to look inside the bird to see if
19 there's contamination or things like that, and it was
20 a time motion study is really what determined that.
21 If you had feces on your finger, you had to take a
22 certain amount of time to rinse your hands off and go

1 look at the next bird. If you had to flip the flap to
2 be able to visualize the inside cavity of the bird,
3 those all were given weighted points, and if you have
4 so many points in a 10 bird sampling, you slowed the
5 line down. So that takes place now. It rarely takes
6 place in the Meyn Maestro system because the viscera
7 has been removed from the birds. So slowing down the
8 lines for those are usually due to pathology, some
9 other factor, you know, some contamination from
10 inadequate feed withdrawal or something like that.
11 And those are decisions that are usually based on the
12 plant making that determination before inspection gets
13 involved in making a determination.

14 MS. ESKIN: So if we're not talking about
15 changing the overall number of inspectors, then what
16 this might result in is having some on-line inspectors
17 do off-line tasks?

18 UNIDENTIFIED SPEAKER: Or how do we use the
19 off-line inspectors most effectively?

20 MS. ESKIN: I understand but it's not about
21 taking on-line inspectors and moving them off-line.
22 Is that a possible scenario?

1 UNIDENTIFIED SPEAKER: Is it possible? In a
2 HIMP plant, there are --

3 MS. ESKIN: Obviously not risk-based. You
4 may, in fact, wind up having --

5 UNIDENTIFIED SPEAKER: We're not trying to
6 make that decision. We're trying to figure out how we
7 could best use --

8 MS. ESKIN: I understand that, but in making
9 decisions, you're going to think of all the possible
10 variables here. If you have a limited number of
11 inspectors and not enough inspectors to do the off-
12 line tasks and you determine that that's where the
13 risk is, wouldn't you then in theory take some on-line
14 inspectors and move them off?

15 UNIDENTIFIED SPEAKER: You could. I mean
16 depending on the line speed.

17 MR. LINK: Given, given the factors you
18 quoted earlier today, actually disease prevalence in
19 poultry is practically non-existent. Primarily the
20 role of the inspector today if I understand it, I mean
21 they're looking for pathology that's not really there
22 much and fecal contamination. That oftentimes is

1 dealt with on-line processing systems and things of
2 that sort, but -- so in my mind, to answer your
3 question, it would make logical sense that they would
4 come off-line to do other important food safety
5 related tasks in some way or another. And in a sense,
6 even the pathology has minimal, I mean it really has
7 no effect on human health in most cases.

8 MS. ESKIN: Right.

9 MR. ELFERING: Except -- toxemia.

10 MR. LINK: But that really has no effect on
11 human health. I think they're more esthetics than
12 anything.

13 DR. BRATCHER: I think what you're really
14 looking at here is that the way it's configured
15 traditionally is that the off-line inspectors have
16 tasks that they need to do. In addition, they're
17 spending a great deal of their time giving inspection
18 breaks and doing duties that are not directly related
19 to food safety. And the same would apply to the
20 veterinarian that's in the plants, and then if you
21 have somebody that calls in sick or you have two or
22 three people gone for some reason, you spend all your

1 time on giving breaks or doing line duties and not
2 doing any food safety tasks or minimal food safety
3 tasks, and I think what we're looking at is a
4 reduction in the number of overall food inspectors but
5 to redeploy the ones that we have into areas where
6 they're doing risk-based inspection.

7 MS. ESKIN: And then where do you get that
8 reduction, the overall reduction?

9 DR. BRATCHER: Well, I think they've proven
10 that in the in-plants, that there are less inspectors
11 in the in-plants. So if we use that as a model, I
12 think what you're going to be moving toward is trying
13 to comply with the regulatory requirements of bird by
14 bird, the end of the line with one person rather than
15 four, and then you're going to be assigning other
16 tasks to people that are off-line, and with the
17 *Salmonella* changes and the other changes, there may be
18 some other tasks that those people might do. We might
19 be able to redeploy some people that historically have
20 been on-line but then you have to also consider how
21 many tasks need to be done and which ones are
22 important, and how many of the OCP [Other Consumer

1 Protection] tasks are done and how much of an impact
2 that has on food safety. Am I on target there?

3 MR. FINNEGAN: Now in HIMP plant, there's no
4 inspector doing actual hands on but the plant does it?

5 DR. BRATCHER: What they've done is they've
6 called it sorting. So the plant's sorting, and for
7 people that have been in a poultry plant, if you see a
8 sep-tox bird come by, I mean I can spot one from
9 across the room on the line going at 100 some birds a
10 minute. Now there are variations of that, and that's
11 one that concerns us the most and the inspectors on
12 the line is that is it or is it not. There are
13 variations. Is that a cadaver or is that a bird that
14 was exposed to extreme weather coming into the plant?

15 I mean there's a lot of in between stuff, and that
16 doesn't get reflected in the, in the data when you
17 look at the condemn. And historically we've done a
18 lot of things that have been quality issues. Even
19 though we've gone away from that and the way we're
20 doing things now, we still look at some quality issues
21 because the plants are concerned about quality.

22 So, you know, there's things that we're

1 doing that we probably don't need to be doing.

2 DR. DENTON: Stan.

3 MR. PAINTER: Yeah, if I could jump in here.
4 Stan Painter with the National Joint Council.

5 Actually, you know, I've been through HIMP
6 and poultry started up in Guntersville, Alabama. I
7 spent my birthday at Guntersville, Alabama when it
8 started up. So I have quite a bit of knowledge as to
9 what's going on with the HIMP operation, and the
10 process with currently, you know, we have one
11 inspector sitting at the line, at whatever line speed
12 the plant chooses to run, and I think I heard someone
13 add, is this what we're looking at going to. I think
14 I heard Phil say yes. Is that correct?

15 MR. DERFLER: I didn't say that to the
16 specifics. I mean there's sort of the idea of the
17 possibility that less people on line doing sorting for
18 us than we have now. I was responding to that
19 question. I wasn't saying that it would be
20 specifically like HIMP or anything like that. The
21 purpose of this is to --

22 DR. DENTON: Phil, can you speak up a little

1 bit more.

2 MR. DERFLER: I'm sorry. The purpose of
3 this is to try and get the input from the Advisory
4 Committee, what's the direction we should be going. I
5 mean we've laid the question open and we're looking
6 for input.

7 MR. ELFERING: This is Kevin Elfering. How
8 about some kind of a hybrid? Is there a possibility
9 of having plant personnel doing the initial inspection
10 with on-line inspectors checking every 25 birds or
11 something, and then you'll be able to pull somebody
12 off the line.

13 DR. DENTON: Let me jump in here a second.
14 That's not part of what we've been asked to do, is to
15 design the new inspection system. What we've been
16 asked to do is answer questions that should facilitate
17 the design of a new inspection system. I don't think
18 that we can get bogged down trying to structure the
19 way a new inspection system works. I think if we
20 answer the questions, they'll provide direction to the
21 Agency with regard to where they need to look in
22 trying to move toward risk-based inspection. I'm

1 afraid that we're drifting off a little bit.

2 Now understanding the inspection system, I
3 think we're able to make sure that everyone is on a
4 level field.

5 Irene.

6 DR. LEECH: I wanted to ask whether anybody
7 down the line who spotted something that shouldn't be
8 there can pull it off at anytime or do the people who
9 aren't inspecting just let things go? I mean what's
10 their assignment? Would anybody working the line at
11 all who saw something have authority to pull things
12 off?

13 MR. PAINTER: Are you asking me or --

14 DR. LEECH: Whoever, in terms of what's
15 right now.

16 MR. PAINTER: Are you referring to a HIMP
17 plant or --

18 DR. LEECH: Anything.

19 MR. PAINTER: In a traditional plant, if
20 somebody goes by the inspector, the plant has the
21 responsibility to remove that at a mirror station, and
22 then there's a station where a finished product

1 standard check takes place, and currently in a HIMP
2 operation, the plant does an organoleptic inspection
3 in place of the inspector and then there is a mirror
4 station that would have the opportunity to pull that
5 off as well, and then there's an inspector, and we
6 have been criticized for touching the birds, taking
7 the birds off, things of that nature, because the
8 plants now, the Agency allowed the critical control
9 point to allowed to be moved beyond the inspector. So
10 we're told to let the stuff go and let the system
11 work. So, you know, we're supposed to let it ride.

12 UNIDENTIFIED SPEAKER: But to answer your
13 question from my perspective, yes, we expect our
14 employees to take things off the line -- and whether
15 it was -- inspector or whether it was HIMP plant --

16 MS. ESKIN: Whatever.

17 UNIDENTIFIED SPEAKER: Should we look at
18 these questions?

19 DR. DENTON: We need to look at these
20 questions, and question number 1 are there other
21 things -- pardon me. I can't even read the question.
22 Are there things other than condition of carcass,

1 pathogens and process control that the Agency should
2 be accomplishing in a risk-based approach to
3 inspection at slaughter? Any comment that anyone
4 wants to make on that? Irene.

5 DR. LEECH: Irene Leech. I would simply
6 make the comment that as far as the consumer is
7 concerned, I know you said we wouldn't do quality but
8 because consumers can't tell looking at things if
9 there are pathogens on them, if something doesn't look
10 right and it makes all the way through the whole
11 thing, the consumer is going to decide there's
12 something wrong based on appearance.

13 So I don't think that's something that can
14 be ignored. Now maybe it's not something that FSIS
15 does, but I think we've got to realize that consumer
16 perception is that way.

17 MR. CORBO: Tony Corbo from Food and Water
18 Watch. Doesn't the Poultry Inspection Act actively
19 have the word wholesome as one of the criterion?

20 UNIDENTIFIED SPEAKER: Yes.

21 MR. CORBO: So in order to comply with the
22 law, the wholesomeness aspect has to be part of this.

1 Not only does the product have to be safe, but
2 there's a wholesomeness aspect that also has to be
3 considered.

4 UNIDENTIFIED SPEAKER: That's the way the
5 statute is written

6 UNIDENTIFIED SPEAKER: Somebody define
7 wholesomeness. But to your point, Irene, I think if
8 it doesn't look right, we're not going to grade the
9 package itself.

10 DR. LEECH: I hope not.

11 UNIDENTIFIED SPEAKER: We've got grading
12 service out there that's giving us the A grade, B
13 grade, whatever, based on what it looks like. So I
14 guess I don't really think FSIS, the slaughter
15 inspector -- they spend a lot of time looking, well,
16 gosh, there's feathers on this wing.

17 DR. LEECH: Okay.

18 UNIDENTIFIED SPEAKER: I mean really.

19 DR. LEECH: That's why I raised the
20 question.

21 UNIDENTIFIED SPEAKER: There's those types
22 of things and, Phil, I think I heard you say part of

1 the problem with HIMP was that they got bogged down in
2 OCPs and OCPs are exactly that, quality issues that we
3 need to deal with obviously but I'm not sure it
4 requires a lot of FSIS effort.

5 DR. DENTON: Chris.

6 DR. BRATCHER: Well, there's one other thing
7 that comes up about that. A lot of these plants now
8 have quality issues that are being addressed by
9 Kentucky Fried Chicken and Burger King, and all these
10 other facilities. They're customer driven. They're
11 way beyond the requirements that FSIS has ever placed
12 on any of these type of products as far as quality and
13 look and consistency and things like those.

14 I really see our role was maybe a
15 compromise. They don't share that information with
16 us, but I think maybe from an inspection standpoint,
17 to satisfy the consumer part of that, is that maybe we
18 ought to look at some of that literature or data
19 they're collecting, and just maybe make some kind of a
20 acknowledgement that we've looked at some of their
21 information and that we are concerned about the
22 consumer part of it, but their standards may be much

1 higher than we've considered in the first place.

2 We have a little bit of oversight in that
3 area. I think that satisfies a lot of the complaints
4 that we've had in the past. I don't know how you
5 would do that but I think it would be a compromise we
6 could reach.

7 DR. DENTON: Okay. Joe -- I mean Stan. I
8 don't know why I keep calling you Joe.

9 MR. PAINTER: That's okay. I've been called
10 a lot worse.

11 (Laughter.)

12 MR. PAINTER: Stan Painter, with the
13 National Joint Council.

14 With what was said regarding the OCPs
15 getting bogged down, I don't think, you know, sending
16 out product with ingesta which has bacteria involved
17 is, you know, something that's minute. I don't feel
18 as though leukosis which is the law that's been
19 labeled in OCP which the regulation states one
20 identifiable leukosis lesion, 1/32 or greater, is a
21 condemnable form of pathology. So just to say that
22 we're getting bogged down with other consumer

1 protections, I think is too broad and too general.
2 There are things that are in OCPs that may not be at
3 the top of the list. When you put ingesta and
4 leukosis and tumors in with the OCPs, those in my
5 opinion are major issues.

6 DR. DENTON: And maybe that gets to the
7 point of the question is are there particular OCPs
8 that the Agency ought to focus on.

9 UNIDENTIFIED SPEAKER: What is an OCP?

10 UNIDENTIFIED SPEAKER: Other Consumer
11 Protection.

12 MS. ESKIN: It's quality issues, not safety
13 issues.

14 MR. DERFLER: I mean I think really what I
15 was trying to get at with the question is, I mean what
16 are the major things that we should be accomplishing
17 in a risk-based systems, and there are some things
18 that I sort of laid out, but there may be more
19 factors. You know, from your perspective, are there
20 other things that we should be trying to accomplish in
21 designing the system to accomplish.

22 DR. BRATCHER: And to some extent, most of

1 what we're talking about still fits under that
2 condition of carcass, or are there things other than
3 that, pathogens, other than the process control
4 feature.

5 MS. ESKIN: I don't think it's relevant for
6 slaughter, but when I read this, I thought about RTE
7 and *Listeria* and the fact that you look at the plant
8 environment, is that ever -- is that factored in here
9 somewhere currently, the status of the environment?
10 I'm sure there's some situations that would cause
11 concern? And again, this is slaughter. It's not
12 necessarily the same situation.

13 DR. BRATCHER: There's a pre-op sanitation
14 that's done each day before the shift starts, and then
15 there's operational sanitation checks that are done by
16 off-line inspectors.

17 MS. ESKIN: And those would fall under
18 the -- in your view, that's sufficient with what there
19 is right now?

20 DR. BRATCHER: Yeah, I think so on the
21 slaughter side, yeah.

22 MS. ESKIN: I think that's what I'm

1 assuming.

2 MR. ELFERING: You're looking at a much
3 more -- coming into the plant with a high load of
4 contamination to begin with.

5 MS. ESKIN: Sure.

6 DR. DENTON: Stan.

7 MR. PAINTER: But we have to look at the big
8 picture of what was said yesterday regarding the
9 question that was asked regarding pre-op sanitation
10 and things of that nature. Is that going to continue?
11 And the answer was it may or may not. So -- and with
12 what was just said, we have to look at the big
13 picture, and are they going to do away -- is the
14 Agency going to do away with the operation -- I mean
15 the pre-operational sanitation.

16 DR. BRATCHER: We do have some processing
17 facilities that have extended cleanup procedures in
18 place now, and they have microbiological criteria that
19 they base that on, and they have to do continuous
20 testing and certain other things to be able to do that
21 continuous operation. It's conceivable that some
22 plants might want to do the same thing on the

1 slaughter side. So, you know, that's something that
2 you might want to consider. I'm not saying that it's
3 happening, but it potentially could.

4 DR. LEECH: But it's microbial testing
5 that's done.

6 DR. BRATCHER: In processing.

7 DR. LEECH: Yeah.

8 MS. ESKIN: Continuously.

9 DR. BRATCHER: Yes.

10 DR. LEECH: But what would -- would
11 microbial be the way to go on slaughter?

12 DR. BRATCHER: Well, it gives you a pretty
13 good indication of whether the equipment's clean or
14 not, and whether the operation is continuing and it's
15 clean. It's kind of -- I've been involved in some of
16 these programs before, and you think of raw chicken,
17 that it's going across a piece of equipment, that it's
18 going to contaminate that piece of equipment, but the
19 microbial data shows that if it's a continuous
20 process, it's moving, that it actually cleans itself
21 as it goes. So the microbial data is less when it's,
22 when it's operating than when it is sitting.

1 DR. DENTON: I haven't heard nothing from
2 Joe yet.

3 DR. HARRIS: All right. Joe Harris. I'll
4 ask a question if nothing else. Process control, is
5 that to include things like operational sanitation?

6 UNIDENTIFIED SPEAKER: Are you asking me?

7 DR. HARRIS: I'm asking -- the question says
8 things other than carcass, pathogens and process
9 control. Obviously sanitation and operational
10 sanitation is important, and I don't know if that's
11 included in process control. I think it probably is
12 but --

13 MR. DERFLER: You can tell us anything you
14 want to say even if you think it's redundant.

15 UNIDENTIFIED SPEAKER: My answer would be
16 yes.

17 DR. DENTON: Okay.

18 UNIDENTIFIED SPEAKER: Some of my colleagues
19 might have some different --

20 DR. DENTON: Charles.

21 MR. LINK: I'd agree with that.

22 DR. DENTON: You agree with that?

1 MR. LINK: Yes.

2 MR. ELFERING: I think, you know, what
3 things should they be looking at in addition to
4 everything you just said, right?

5 DR. DENTON: Yes.

6 MR. ELFERING: I mean is our process
7 control, hazard -- what did you say HACCP --

8 MS. ESKIN: That's part of process control.

9 DR. DENTON: Pathogens and condition of
10 carcass.

11 MR. ELFERING: Yeah, it's all part of it. I
12 mean when you look at our HACCP programs and I almost
13 thought I heard today that we hadn't really done
14 hazard analysis at our slaughter evisceration today,
15 but I mean every process step, hazard analysis has
16 been done. There's either programs in place to
17 address a particular shoe or we may put in a CCP or
18 who knows what, but those are the types of things I
19 guess an inspector ought to be looking at, well, are
20 they doing the things they said they were going to do?

21 And if they are, you know, the processes are
22 in control, certainly you can verify that through the

1 *Salmonella* and generic *E. coli* testing that's done,
2 all those things that we do today. I think the off-
3 line inspector currently does a lot of that and maybe
4 not as in depth as he could because he's also, you
5 know, doing 10 bird checks, in-line, going past the
6 chiller birds there and so he's tied up doing a lot of
7 carcass evaluation.

8 UNIDENTIFIED SPEAKER: Are they doing any
9 economic work as well like --

10 DR. BRATCHER: It's nutritional labeling,
11 labeling checks.

12 UNIDENTIFIED SPEAKER: So if you want to
13 look at a risk-based inspection system, if you're only
14 looking at food safety, then --

15 DR. BRATCHER: Yeah, some of that stuff
16 could go, too. Or maybe it's important. It's on the
17 table.

18 MR. DERFLER: If it's important, you should
19 tell us.

20 DR. BRATCHER: Yeah.

21 MR. DERFLER: I mean we're trying to start
22 from the beginning. I mean there is obviously what's

1 happened, you know, what we intend to rely on what's
2 happened but what are you telling us.

3 MR. ELFERING: Well, I think if you ask the
4 consider if what's important to them, you're going to
5 get a lot of different answers. Some people don't
6 want to have added water. They don't want to be
7 paying for water, and some don't have any idea that
8 poultry is going to take up water. So --

9 DR. LEECH: I have a friend who has
10 allergies who says he can't eat certain brands of
11 things because they put flour in with the water.

12 MS. ESKIN: Of chicken -- meat and poultry.

13 DR. LEECH: Yeah.

14 UNIDENTIFIED SPEAKER: I've never heard of
15 that.

16 DR. LEECH: I don't know. I'm saying that's
17 what he's, he's, you know,

18 UNIDENTIFIED SPEAKER: I never heard of it.
19 You can get more water into them that way.

20 (Laughter.)

21 DR. LEECH: He has an allergic reaction.
22 That's what he thinks it is because it's in foods that

1 he knows he's allergic, too. I don't know. I'm just
2 telling you what I've heard a consumer day. He says I
3 can eat Sara Lee, but I can't eat some other brands.

4 MR. ELFERING: Mr. Chairman, would we be
5 going beyond our boundaries then if we would say that
6 -- if we would suggest to eliminate looking at
7 economic issues?

8 DR. DENTON: I was about to ask the
9 question. There may be some things in here that we're
10 doing that we think could go by the Board which would
11 then free up resources to focus on food safety.

12 MR. ELFERING: The recommendation would be
13 to focus --

14 DR. DENTON: Is somebody capturing this?

15 MR. ESKIN: That's your job.

16 MR. ELFERING: -- prioritize food safety
17 concerns rather than concerns of economic or quality.

18 MS. ESKIN: But again, aren't there some
19 OCPs that are --

20 UNIDENTIFIED SPEAKER: There's some OCPs
21 that rise to the level of food safety.

22 MS. ESKIN: So you want to capture that.

1 UNIDENTIFIED SPEAKER: Yes.

2 UNIDENTIFIED SPEAKER: Or regulatory
3 requirements.

4 MS. ESKIN: Right.

5 UNIDENTIFIED SPEAKER: That's what I was
6 going to say, that's what I jotted down, economic
7 issues.

8 UNIDENTIFIED SPEAKER: Now we're getting
9 somewhere.

10 UNIDENTIFIED SPEAKER: Let me bring up
11 something else that I think we've gotten away from
12 that we need to get back to, is in a HIMP plant, and
13 if we were going to that way in a slaughter plant,
14 toward that direction, which I'm not in favor of
15 personally, is the fact that our livers, hearts,
16 gizzards, and necks bear the mark of inspection when
17 they've never been inspected. And when are we going
18 to start inspecting our livers, hearts, gizzards and
19 necks that our people eat that bear the mark of
20 inspection that are not inspected? Is that going to
21 happen? And I think we're going to have to get back
22 to that as well. That's been brought up over and over

1 and over again.

2 UNIDENTIFIED SPEAKER: What about chicken --

3 UNIDENTIFIED SPEAKER: Well, that does not
4 bear the mark of inspection. It says it's inspected
5 for wholesomeness, and it's processed and packed in a
6 cleanliness and wholesome manner, but we're not
7 guaranteeing the quality of the chicken -- but we're
8 guaranteeing the quality and the wholesomeness of the
9 livers, gizzards, necks and hearts that have never
10 gone before an inspector every day in HIMP operations,
11 and I don't think we need to get past that in moving
12 toward this process.

13 UNIDENTIFIED SPEAKER: I guess I agree
14 they're not going past the on-line inspector. They're
15 coming off before that, and aren't the inspectors
16 doing evaluations of them on an hourly basis?

17 UNIDENTIFIED SPEAKER: No. No, you do two
18 checks per day of 10 pieces under the AQL [Acceptable
19 Quality Levels] process. That's it. Ten.

20 DR. LEECH: And what are you checking for?

21 THE WITNESS: Well, you're looking for
22 instance the heart. You're looking to see that the

1 valve is no longer than 1/8 of an inch, sticking out
2 past the heart, and a liver, you're looking for
3 spleens, remnants of spleens. You're looking at
4 gallbladder still attached, testicles that may still
5 be attached, things of that nature, and the gizzards,
6 you're looking at the ingesta that may still be a part
7 of the gizzard or, you know, embedded in the fat
8 that's on the gizzard or you're looking at the lining,
9 the peeling on the inside to make sure that all that's
10 been removed. That's what you're looking for.

11 DR. LEECH: So there's no pathogen test
12 or --

13 UNIDENTIFIED SPEAKER: No.

14 UNIDENTIFIED SPEAKER: I mean the basic
15 issue though is if the carcass is passed, there's no
16 system of -- and therefore there's no reason to
17 condemn it.

18 UNIDENTIFIED SPEAKER: Are those quality
19 issues or --

20 UNIDENTIFIED SPEAKER: I don't believe
21 they're food safety issues.

22 UNIDENTIFIED SPEAKER: Well, if you don't

1 have -- you may have --

2 COURT REPORTER: I can't do this. You guys
3 are all -- I need for you to identify yourselves,
4 because our lady is going to go what? Who? Who are
5 these people? And you're all talking at once and I
6 can't --

7 DR. DENTON: Okay. Please identify yourself
8 before you made a comment. Kevin.

9 MR. ELFERING: This is Kevin Elfering.
10 Those issues are -- really don't have anything to do
11 with food safety, and I think if you're going to be
12 looking at a risk-based system, you need to focus all
13 of your efforts on food safety, and that's really how
14 the entire inspection system has evolved over the
15 years. We used to look at so many economic issues and
16 really economic issues and other quality issues really
17 just don't have the importance, and I think that what
18 Dr. Raymond wants is to be able to say that this
19 Agency is doing something to reduce food-borne
20 illness. And that's what really needs to be focused
21 on.

22 DR. DENTON: Stan.

1 MR. PAINTER: And I'm saying that by
2 removing that viscera prior to the viscera -- prior to
3 the carcass getting to the inspector, you could have
4 one identifiable leukosis lesion in the spleen that
5 would mean that carcass should be condemned.
6 Regardless of where the Agency has it categorized. I
7 don't care where they put it. They basically have
8 everything in the other consumer protection category.
9 So I mean you look at the food safety category and
10 you look at the other consumer protection and, you
11 know, we're sticking everything in kind of a catchall
12 category, you know. You can have a liver that has,
13 all crap, I can't even think of it right now,
14 granuloma, you know, that we certainly wouldn't want
15 to eat a liver with granuloma, cirrhosis of the liver,
16 you know, where, you know, the liver can come out that
17 it's huge. I mean it almost covers the entire portion
18 of the cavity. So, you know, and I think if some of
19 the people saw some of the things that can happen, you
20 know, I'll cook some of this stuff up and let you
21 people eat it if that's what you want to do, and then
22 it becomes a food safety issue with you then if, you

1 know, in some of these things. Then if that's what
2 you want to do, I'll cook it up and let you eat it.

3 MR. ELFERING: This is Kevin Elfering. I
4 agree that those are all esthetic issues but they
5 still -- a lot of animal pathology has nothing to do
6 with food safety.

7 MS. ESKIN: In terms of human illness.

8 MR. ELFERING: In terms of human illness,
9 right. It has very little pathology related to human
10 illness. Again, it's esthetics and I don't disagree
11 that the American public certainly doesn't want to
12 consume that, but if we're looking at food safety, and
13 we're looking at human health, it has no bearing.

14 DR. DENTON: Charles.

15 MR. LINK: Charles Link. To try to get back
16 to the question, we kind of threw the economic issues
17 out there as something. The OCPs, we may need to re-
18 evaluate or finished product standards I guess they're
19 called in most plants, as to which one of those should
20 the Agency really focus on and which one should they
21 not. It might free up some time, I don't know. And I
22 guess it's these esthetics, these quality issues, I

1 mean livers to carcass. How much time do you want to
2 devote to that? That's not really a food safety risk.

3 DR. DENTON: Okay.

4 MR. DERFLER: I just have one question.
5 Kevin, you said -- Phil Derfler. I'm sorry. You said
6 your state has a risk base. I mean are there things
7 that you're doing or things that you're looking at
8 from sort of a food safety risk standpoint that
9 wouldn't be captured from what we sort of laid out?

10 MR. ELFERING: This is Kevin Elfering. Not
11 in a slaughter plant. I mean they're pretty
12 straightforward, you know. In processing plants, yes,
13 but not in slaughter.

14 DR. DENTON: Okay. I think we have pretty
15 well exhausted the concepts under Part A of that
16 question. We'll now work on Part B. How can risk be
17 factored into the accomplishment of these other
18 purposes? It seems a bit redundant, but that's okay.

19 MR. LINK: Charles. I think you almost have
20 to look at, when you're talking about risk, are we
21 getting to inherent risk or plant risk? I mean if you
22 depend on the plant, the process, what they have in

1 place to address certain issues, food safety issues,
2 if it's *Salmonella* reduction -- for example, you
3 almost have to take into consideration what are they
4 doing and how well are they doing it to decide how
5 much attention I want to give them.

6 MS. ESKIN: But the question seems to be,
7 following on the first one, are there other things.
8 We all said no. In fact, we think some things should
9 be taken out. Isn't that what we just said? Some of
10 the economic issues. So in a way, we don't think
11 there's anything else.

12 DR. DENTON: That's the way I see it.

13 DR. LEECH: Yeah.

14 DR. DENTON: Okay. We'll get a chance to
15 talk more about process control in a little bit.

16 DR. BRATCHER: Chris Bratcher. Maybe you
17 should prioritize the risk based on what it is, and I
18 think there's one really important thing that's not
19 been mentioned here, is that if a plant is willing to
20 put in interventions, that would control the risk or
21 reduce the risk, then the factor on that risk would be
22 lowered, and they should get credit for that.

1 MS. ESKIN: Yeah, but does that go here? I
2 don't think so.

3 DR. BRATCHER: Well, maybe not, but --

4 MS. ESKIN: Those interventions would have
5 to be one of the things that's already mentioned,
6 right? Things done with the carcasses.

7 DR. BRATCHER: But there are some plants
8 that -- he mentioned some of the giblets and things
9 like that, and there are plants that are using
10 chlorine dioxide or chlorinated water or some of those
11 things for rinses on that product, too. So I don't
12 know. I think you would -- if you identified that
13 there are risks that need to be taken care of, then
14 maybe you should prioritize those from the most
15 important to the least important.

16 DR. LEECH: In terms of human illness.

17 DR. BRATCHER: In terms of human illness,
18 right.

19 DR. DENTON: Okay. That's good. Question
20 number 2, this deals with the issue of Agency
21 deployment of resources in poultry slaughter. What is
22 the best way for the Agency to deploy its personnel to

1 accomplish purposes of inspection?

2 MR. ELFERING: This is Kevin Elfering. I
3 think the best way is to again just look at risk,
4 really truly look at what the risks are and put of
5 your -- the majority of your efforts on the riskiest
6 operations. Where is the risk going to occur? And
7 like Chris said, if the plant has got interventions
8 that's going to reduce that risk, you can reduce your
9 amount of inspection in those particular area. So
10 really the deployment should be based strictly on the
11 inherent risk and how the plant is addressing them.

12 DR. DENTON: Okay. Thank you.

13 MS. ESKIN: Sandra. Two things. One, while
14 I agree intervention should be factored, isn't there
15 also the concern, the intervention is being done
16 properly? So doesn't the inspector need to --

17 MR. ELFERING: And I guess I always assume
18 that whenever we look at interventions out there,
19 they're working properly.

20 DR. LEECH: We're verifying that.

21 MS. ESKIN: You have to verify it.

22 MR. ELFERING: Yes, maybe add that in there,

1 that if they are using interventions, that
2 verification of those interventions are being done as
3 well.

4 UNIDENTIFIED SPEAKER: That's almost back to
5 that first question, what should they be doing?

6 DR. DENTON: Chris.

7 DR. BRATCHER: One key point to that, if
8 you're going to deploy your resources -- this is Chris
9 Bratcher again, if you're going to deploy your
10 resources, there's two things you need to consider.
11 One is that, you know, we have a bunch of inspectors
12 and personnel in these plants now, to look at these
13 things, and those people I look at as primarily
14 technicians. Then if you need to go beyond that, if
15 you need to do evaluations of statistical analysis,
16 continuous process control charts, some of those
17 things, you're going to need somebody who has at least
18 an educational background to be able to make an
19 interpretation of whether that's correct or not
20 correct and appropriate for the mechanism that you've
21 got in place, if it's an intervention or whatever that
22 might be. So basically I'm putting a plug in that you

1 need to have either a veterinarian or a microbiologist
2 or somebody who at least has some credentials to be
3 able to interpret the data that's being generated by
4 the plant.

5 DR. DENTON: Sandra.

6 MS. ESKIN: Unless and until the statute
7 changes, obviously the Agency has to at a very minimum
8 have whatever on-line inspectors looking at the
9 carcass. You have to have that, even though maybe we
10 would all agree or some of us would agree maybe that's
11 not aligned with risk. It is the law and the program
12 won't go forward unless there's sufficient presence.

13 DR. DENTON: Okay. Stan.

14 MR. PAINTER: Stan Painter, National Joint
15 Council. Maybe I'm missing something here and I guess
16 this is kind of a question for the group. It appears
17 as though to me the questions are based around what
18 Sandra just talked about, the law already being
19 changed, and there's no bird-by-bird or carcass-by-
20 carcass inspection. That's, that's to me, seems the
21 way that all these questions are geared, that we've
22 already eliminated that process of bird by bird and

1 carcass by carcass. Now what are we going to do with
2 these people?

3 MR. DERFLER: They're written on the
4 assumption, like Sandra said, we have to have some --
5 the question is how do we design our inspection
6 program around it?

7 MS. ESKIN: There has to be at least some --

8 DR. DENTON: As I captured her last point,
9 this is James Denton, Chairman, maintain the on-line
10 inspection as it can be done to meet the statute.

11 MS. ESKIN: Consistent with, yeah, it has to
12 be. It has to be on-line. We may disagree ultimately
13 if it's sufficient, but then that will have to be
14 decided.

15 DR. DENTON: That's what I'm hearing her
16 say.

17 DR. HARRIS: So what we're -- this is Joe
18 Harris. We're talking about deploying the off-line
19 inspection resources essentially then?

20 MS. ESKIN: Yes, although it sounds like in
21 theory some on-line -- the determination is made, I
22 don't want to give a number but there's one on-line

1 inspector is enough. If there's three others, then
2 they theoretically could be deployed doing these off-
3 line tasks. So there is an acknowledgement there
4 needs to be on-line inspection, but obviously we don't
5 know how much would necessarily continue. It's going
6 to depend on each plant.

7 DR. DENTON: Okay. Moving to question
8 number 3, what comments do you have on the use of this
9 type of approach to guide how FSIS deploys its
10 inspection resources in slaughter operations?

11 MR. ELFERING: This is Kevin Elfering. The
12 approach would be -- well, on-line inspector continues
13 to make appraisal of carcasses to the point off-line
14 inspectors, so they're able to look more broadly at
15 all steps in the process. I think we have pretty much
16 come up with a couple of suggestions. I don't know if
17 there would be more to add to it.

18 DR. DENTON: Stan.

19 MR. PAINTER: Stan Painter. Would we want
20 to allow our people that would be on the line to be
21 able to look in the carcasses?

22 MS. ESKIN: They do that now. Sorry.

1 Sandra. They do that now. Are we suggesting we
2 change that?

3 MR. PAINTER: Well, they did that -- Stan
4 again. We do that in traditional plants but not in
5 HIMP plants, we don't look in the carcasses.

6 MS. ESKIN: Because?

7 MR. PAINTER: Because we've been instructed
8 not to because HIMP according to the -- I think we're
9 on HIMP Draft Number 7 now, states that we're
10 responsible for the outside of the carcass.

11 MS. ESKIN: This is Sandra. Does the
12 establishment employee look inside or nobody looks
13 inside?

14 MR. PAINTER: The establishment employee can
15 look inside the carcass. My understand is the Agency
16 with the process currently, they don't even have to
17 have anybody if they choose not to but they have to
18 maintain guidelines.

19 MR. ELFERING: This is Kevin Elfering. I
20 don't think we want to get -- I really don't think we
21 want to get mixed in HIMP, but very honestly HIMP
22 works. It works, it works in the sense of the

1 statistics that we have is we have lower numbers of
2 *Salmonella* in HIMP plants than in traditional plants.

3

4 MR. PAINTER: Okay. Stan again. As I
5 brought up earlier, in the plants that I'm aware of,
6 that are -- that's under the HIMP project, the Agency
7 has pressured the plants to have an anti-microbial
8 rinse, and from my knowledge, the plant -- the Agency
9 has pressured the HIMP plants more so than the
10 traditional plants. Now why would that be?

11 MR. LINK: This is Charles. Charles Link.
12 I'm not aware that there's any requirement to have an
13 anti-microbial rinse to be in HIMP. Now to get your
14 *Salmonella* number, performance standards to where you
15 want to be, you've got to do something, anti-microbial
16 rinse, you know, process control systems or whatever,
17 but that's not part of HIMP.

18 HIMP is basically the plant employees taking
19 on the responsibility of sorting those carcasses,
20 looking inside, making the determination whether the
21 carcass goes down the line to the inspector or not.
22 It goes off-line for reprocessing or it goes in the

1 condemned barrel. So somebody's still making that
2 call. It's a trained company employee rather than a
3 Government employee but ultimately they still go by
4 the inspector.

5 MR. FINNEGAN: This is Mike Finnegan. So
6 just to get it straight, so in a HIMP plant, the plant
7 personnel look inside the cavity and the outside of
8 the bird and sort it out, and it's still the ultimate
9 decision of the inspector?

10 MR. LINK: Yeah, the on-line inspectors look
11 for obvious defects, except Dr. Bratcher that can pick
12 one out from 100 feet away, I mean those kind of
13 things, fecal on a bird. We're not looking for
14 pathology necessarily unless there's like was said, a
15 tumor or something.

16 MR. FINNEGAN: I read somewhere -- this is
17 Mike Finnegan. I read somewhere that the plants have
18 condemned more birds than FSIS has ever thought of.
19 Is that a correct -- I read that. I don't know.
20 Maybe it was a hog slaughter, but I'm just trying to
21 get the feel of what HIMP is.

22 MR. PAINTER: This is Stan Painter again.

1 Let me be clear. In no shape, form or fashion, did I
2 say that the Agency required plants under HIMP to have
3 an anti-microbial. That is not what I said. I said
4 there's been a strong urging of, of there to be an
5 anti-microbial rinse. You know, of the plants that I
6 know of, the plants that I'm aware of, the plants that
7 I deal with, you know, the Agency is constantly after
8 plants, why don't you get an anti-microbial, not
9 making it a requirement. So it's clear to me now from
10 today's presentation of why the Agency wanted to do
11 that. The Agency wanted, in my opinion, to present a
12 program that says, look what we've done. So I'm going
13 to urge a person under the HIMP project to do an anti-
14 microbial and I'm going to let the others do willy-
15 nilly. But I in no way, shape or form or fashion said
16 there was a requirement.

17 DR. DENTON: Okay. Tony.

18 MR. CORBO: Tony Corbo, Food and Water
19 Watch. As much as I would like to believe the Agency,
20 in two previous sessions, going back three and four
21 years ago, when an in depth discussion was taken up by
22 this committee on HIMP, the Agency essentially

1 massacred their presentation. The statistics were
2 challenged. They even brought in, you know,
3 outside -- that became controversial as well. So as
4 much as I would like to believe the stats, I wouldn't
5 take them for, you know, with a grain of salt at this
6 point. That's why my organization has attempted to
7 gain access to those records to see what's really
8 going on in those HIMP plants, and the Agency has
9 stalled. And so, you know, they can put up these
10 charts without having an elaborate discussion in terms
11 of how those statistics were generated and I'm not
12 going to believe them. I'm just not going to believe
13 them. I've sat through those meetings in the past,
14 and they really -- they were contentious. People were
15 yelling at one another, and so until they come up with
16 some backup for those numbers, I'm not going to
17 believe them.

18 MS. DILLEY: May I ask a question?

19 DR. DENTON: Go ahead.

20 MS. DILLEY: I'm a relative newcomer for
21 sure to poultry slaughter. It may sound like a
22 newcomer's question, but it sounds like a lot of what

1 you're talking about and, Kevin, you raised -- this is
2 Abby Dilley with RESOLVE. I'm sorry. You raised the
3 question of HIMP works, and I just wondered if there
4 are data? I mean do you know why? Because there's
5 more chemical rinses or has there been an analysis in
6 terms of why HIMP works and so even to figure out why
7 it's working and then whether that affects the
8 workforce, the inspectors, that's how you could figure
9 some of that out?

10 MR. FINNEGAN: This is Mike Finnegan. I'm
11 just going by this chart in here under traditional
12 versus HIMP. Every year the rate of *Salmonella* has
13 gone down.

14 MS. DILLEY: But do you know why?

15 MR. FINNEGAN: No, I'm not familiar with
16 poultry.

17 MR. PRETANIK: May I --

18 MS. DILLEY: Identify yourself.

19 MR. PRETANIK: I'm Steve Pretanik, National
20 Chicken Council. My understanding of the whole HIMP
21 pilot program was to take those activities that looked
22 at biology and defects. It was not based on reducing

1 pathogens. It was strictly a visual esthetic type
2 activity, removing those activities that Government
3 employees were doing, and then having an inspector
4 verify that the plant is doing that task, and having
5 the inspector check the carcass at the end.

6 The fact that HIMP plants are getting better
7 *Salmonella* results, maybe they're using anti-
8 microbials but my understanding is that that was never
9 part of the original concept. This was strictly to
10 remove organoleptic, let the plant employees remove
11 these organoleptic defects on a carcass, and it was
12 not intended to be part of a pathogen reduction
13 program originally because you remove bruises,
14 feathers and so forth or even pathology, that may have
15 no bearing at all on the *Salmonella* levels or other
16 pathogens on the carcass.

17 DR. DENTON: That's true, and let me add on
18 to what Steve has said, because of the requirement
19 that all plants have to meet the *Salmonella* component
20 standards, that data is being collected, and I think
21 this is where the information is coming from. It's
22 just been sorted and organized to compare the

1 traditional plants to the HIMP plants. Back to Abby.

2 MS. DILLEY: So the question really isn't to
3 HIMP or not to HIMP. It's more what can an inspector
4 be doing better to focus on food safety.

5 MR. ELFERING: And, Mr. Chairman, I think we
6 should not try to compare it to HIMP. I think we
7 should focus on the task at hand.

8 DR. DENTON: Okay. Chris.

9 DR. BRATCHER: Chris Bratcher. I happen to
10 have five large slaughter facilities in my circuit,
11 and the one plant that has the best *Salmonella*
12 performance standards has not interventions in the
13 plant, and they've chosen to direct all their
14 activities toward their grow out, and on their last
15 *Salmonella* performance set, they had one positive,
16 which is almost unheard of and that was a turkey
17 plant. So, you know, and that's back to the same
18 point that I made before. If they're doing something
19 and they're doing a really good job, then they should
20 get credit for that somewhere, encourage them to
21 continue to do that.

22 DR. DENTON: Okay.

1 MR. LANGE: Loren Lange of FSIS. My memory
2 is that the contention, I don't disagree with you, was
3 RTI's [Research Triangle Institute] analysis of the --
4 at the time of implementation, they had those 300
5 before, 300 after, 300 before and 300 after, and they
6 actually -- that data, you can question the design of
7 the -- but it did go up a little and, yes, the Agency
8 had an analysis that was presented at the Advisory
9 Committee, well, yeah, it went up a little bit but
10 it's not statistically significant, and it was a
11 really bad meeting. The data Phil though presented
12 today has been our ongoing set verification data, to
13 separate that before and after. And I know in the
14 past, five years ago, I would say when we sort of said
15 HIMP plants are a little lower, someone said, well,
16 they were better to begin with, but that before and
17 after data that you're talking about was what showing
18 it works, but we do now have data that shows the
19 industry as a whole was increasing over that three
20 year period. The HIMP plants were doing something to
21 lower it, but we don't know what it is.

22 MR. CORBO: So respond to our FOIA [Freedom

1 of Information Act] and we'll be happy.

2 MR. FINNEGAN: And I agree with -- we can
3 sit here and debate HIMP all night and I don't think
4 that's why we're here.

5 MR. ELFERING: Sorry I brought it up.

6 DR. LEECH: Well, --

7 DR. DENTON: Okay. Exercising the
8 Chairman's prerogative, we're going to move to
9 question 4, or what I have labeled as question 4.
10 It's under the task performed by inspection personnel.
11 What effect should considerations of risk have on what
12 we ask our inspection program personnel to do?

13 MR. DERFLER: There's one at the beginning
14 and then there's one at the end that raises sort of
15 the same question. I was just trying to make a
16 presentation.

17 DR. DENTON: Joe.

18 DR. HARRIS: Joe Harris. Going back to the
19 model of risk that we've been talking about for three
20 days now, the two components, in this situation I
21 think product inherent risk, we're pretty much dealing
22 with the same product. So that is kind of the -- a

1 constant in this particular discussion. So we're
2 going to be looking at the establishment control of
3 that risk. So that to me would be the -- sort of the
4 foundation for then how are we going to direct program
5 personnel based on the establishment control of that
6 risk and that goes back to several of those categories
7 or risk, the now infamous wheel that's been shown on
8 so many slides, that has a variety of components,
9 compliance history, et cetera. Those have yet to be
10 established on how much weight to give each one, and
11 exactly how those are going to be defined, but
12 ultimately those are going to be defined. And as well
13 as there could be other components of establishment
14 control of risk that might be included as well, and at
15 that point, the establishment's risk profile if you
16 will, would seem to me to dictate how inspection
17 personnel are going to do their job or do what is
18 asked of them as this slide says.

19 DR. DENTON: Okay.

20 MR. FINNEGAN: This is Mike Finnegan. And I
21 agree with Joe, in that that's where we're getting to,
22 and this is for the off-line inspectors to consider

1 their risks of the plant, the establishment, whether
2 their process is in control. I mean they're to verify
3 that the system is working.

4 DR. DENTON: Okay. Stan.

5 MR. PAINTER: Stan Painter, National Joint
6 Council. You all, we're looking at the part itself,
7 as to say, well, is it a raw product and is that a
8 risk or is it ready to cook, ready-to-eat, whatever,
9 is that a risk?

10 The picture is bigger. You know, I pulled
11 up to a plant in my Council in the southeast one time,
12 and that was probably the worst plant I had ever saw
13 in my life on the outside, and I walked inside, and it
14 looked like a Cadillac. You know, we're talking one
15 of the nicest plants I've ever been in, you know. So
16 the plant itself can create a risk to the product, you
17 know, do you have a plant that the walls are stainless
18 steel or do you have a plant that they're painting
19 every other day with flaking paint, and you're looking
20 overhead. Is it sealed overhead. Is there rusty
21 pipes overhead? You know, you're looking at the
22 product just itself. You've got to look at the big

1 picture and the building is part of the picture.

2 DR. DENTON: Joe.

3 DR. HARRIS: Joe Harris. By the way, I
4 completely -- I didn't mean to leave that out because
5 obviously sanitation, plant sanitation, maintenance,
6 sanitation performance standards, all of those are a
7 part of that plant control and risk, and has to be a
8 part of the equation.

9 DR. DENTON: Part of the establishment.
10 Okay. Sandra.

11 MS. ESKIN: Yeah, just a question. In that
12 wheel, I'm trying to remember, the issue of
13 interventions in a plant does seem to make sense to be
14 factored in. Are they already factored in here
15 somewhere?

16 UNIDENTIFIED SPEAKER: System design I think
17 is where it should be.

18 MS. ESKIN: So if it's already in there, we
19 don't need to include it separately. Did it say
20 interventions? But the issue is it should be there.

21 UNIDENTIFIED SPEAKER: As Chris has pointed,
22 the interventions are -- it's all focused on the form.

1 It's not going to show in the plant profile.

2 MS. ESKIN: I'm talking about
3 interventions -- this is Sandra -- that would be part
4 of the establishment risk control.

5 DR. LEECH: Some of the things that they put
6 in could be --

7 MS. ESKIN: No, no, I know that but what the
8 inspector -- the question is can the inspector keep
9 that in mind when he's -- I thought he was just going
10 to be -- the determination of the risk of the
11 establishment is all this data once it gets processed
12 through whatever equation. And again, that takes into
13 account interventions at the plant, correct?

14 MR. LINK: Yes and no. I guess I have a
15 little bit of a problem saying, well, if a plant has
16 an intervention and plant B has three interventions,
17 maybe not. I mean really it gets down to how well are
18 they performing.

19 MS. ESKIN: I understand but I'm talking
20 about what we've all identified as factors, however
21 they're weighted. It's in there. Not in process.
22 Not in the plant. I don't think that's factored in.

1 DR. DENTON: I'll try to help clarify this,
2 and those that are in the business may be able to tell
3 me. I don't think the in-plant inspector is going to
4 know whether or not an intervention occurred prior to
5 that bird getting to the plant.

6 DR. BRATCHER: This is Chris Bratcher. Not
7 unless there is data provided by the plant that could
8 support them, and that would be part of their -- maybe
9 potentially their hazard analysis or something like
10 that where they've identified that they're controlling
11 the pathogen outside with grow out and then they would
12 have a program. But it would not be something that we
13 could verify except through testing and our evaluation
14 of their testing which could be something they make
15 available for us.

16 MR. FINNEGAN: Which would be part of their
17 design, part of their system design.

18 DR. BRATCHER: Exactly. The key is
19 appropriate intervention in some measurable form that
20 they work.

21 DR. LEECH: It would seem to me that the way
22 you figure out what the inspector needs to do is based

1 on risk and you put the highest -- put the highest
2 priority on the thing that has the greatest risk and
3 impact. I'm not using the proper terms but that's --
4 I think that's how you prioritize based on risk.
5 That's what you really base it on it sounds to me.

6 MR. FINNEGAN: This is Mike Finnegan. You
7 don't -- under the current system, isn't the PBIS
8 rated according to risk now, the highest priority as
9 food safety as compared to economic? I mean we
10 already have major risk involved in the PBIS
11 schedules, do we not?

12 MR. PAINTER: Yes. Stan Painter, NJC. That
13 is correct. It's weighted with your HACCP and your,
14 you know, your terrorism codes and things of that
15 nature, are weighted higher, and if we're short
16 staffed or things of that nature, we're supposed to do
17 those things with the higher weighting first.

18 DR. LEECH: Irene again. But we're kind of
19 designing it from scratch which is I think what we're
20 being asked to do. Then I think that's information
21 that we need to present that we would still -- with
22 that criteria and then they pull this whole thing or

1 do it some other way, but that's what I understand
2 we're being asked.

3 MR. FINNEGAN: Right, right. Mike Finnegan.
4 We're being asked as the inspector -- what does it
5 say? Inspection personnel to do. Right. We're going
6 to ask them to use the risk factors, you know, the
7 wheel and everything, as compared to economic factors
8 which we discussed before, right?

9 UNIDENTIFIED SPEAKER: Right.

10 DR. LEECH: Irene again. I would say
11 especially given all the conversation about the wheel
12 and whether it really is a wheel or whatever, I still
13 think that it's a matter of we've got all this data
14 and for this outcome, these are the pieces you need
15 and you may not pull all this data from that wheel
16 just like we talked about that maybe that food defense
17 piece didn't fit in all cases.

18 DR. DENTON: Joe.

19 DR. HARRIS: Well, to maybe add to my
20 previous comment when I say risk, I do think that we
21 would want to see things prioritized according to
22 risk -- public health risk -- generic risk term, but

1 those things that it's going to impact, human health
2 things would be the areas that we would want to see
3 prioritized.

4 DR. DENTON: Kevin.

5 MR. ELFERING: Kevin Elfering. Well, I look
6 at everything from a cause and effect, but I actually
7 look at it from almost backwards, what's the effect?
8 What is the effect out there? What are we trying to
9 accomplish number one? We want to reduce food-borne
10 illness and one of the causes of food-borne illness,
11 mainly from a poultry plant is going to be
12 *Campylobacter* and *Salmonella*. So those are the
13 things, and what causes, what causes contamination of
14 *Salmonella* and *Campylobacter*? And what is either
15 going to -- it's the same as looking at HACCP. You
16 either need to eliminate, reduce to an acceptable
17 level or prevent, and you base that on the areas of
18 the facility where you can either increase or cause
19 contamination mainly.

20 DR. LEECH: Or help remove it.

21 MR. ELFERING: Yes. So you almost -- in a
22 sense, you have to kind of design your own HACCP plan

1 in assigning risk and look at what are really critical
2 areas in the processing plant.

3 DR. DENTON: Chris.

4 DR. BRATCHER: I heard this once before in
5 one of these groups, and I'll just say it again. One
6 of the people suggested that the Agency should use
7 HACCP principles in designing the way they're going to
8 inspect the plants, and if we applied the HACCP
9 principles to the method that we use for basing
10 determinations on how we're going to do our
11 inspection, I think we would cover everything that you
12 just said.

13 MR. ELFERING: And really that's what we
14 should be doing. I've always said that -- we've
15 always as Government agencies, we've told the industry
16 to embrace HACCP. When are we going to start?

17 DR. BRATCHER: Exactly.

18 DR. DENTON: Sandra.

19 MS. ESKIN: Following that idea, I mean
20 they're really -- a bird can be contaminated the
21 minute it walks in -- the minute it's brought into
22 (laughter) the plant. It rarely walks in. And then

1 obviously the other way it can get contaminated is
2 cross-contamination. So obviously it makes sense to
3 check right when they come in, but are there places
4 throughout that slaughter steps where there's no
5 possibility of cross contamination? Is there any
6 place where it's not possible? Which leads me to the
7 question of, is it possible at every step?

8 MR. ELFERING: This is Kevin Elfering. I
9 think first of all you always have to consider that
10 you're always going to have -- you're going to have
11 *Salmonella* and *Campylobacter* come into the plant off
12 of the birds.

13 MS. ESKIN: You're saying there's no way
14 short of --

15 MR. ELFERING: Well, no, you'll never get it
16 down to zero especially *Campylobacter*. I mean
17 *Salmonella*, *Salmonella* levels are pretty low compared
18 to *Campylobacter*. You're looking at probably 80
19 percent positive *Campylobacter* in poultry. So I think
20 that you would probably need to be looking at mainly
21 cross-contamination.

22 MS. ESKIN: And again -- Sandra -- that can

1 feasibly happen anywhere in the slaughter steps,
2 right?

3 MR. ELFERING: Uh-huh.

4 DR. DENTON: Stan.

5 MR. PAINTER: Stan Painter with the NJC.
6 Most of us who have been in a poultry plant, you know,
7 you go in, you're looking on sanitation, you go into
8 the picking room, and the water is nice and clear and
9 you see the bottom of the, you know, and you see a
10 feather and oh, the feather's got to go, you know.
11 Where did the feather come from? We didn't get the
12 feather out from the day before, and within three
13 minutes it's this brown, nasty water where you've got
14 this foam because the chickens are nasty. They're
15 sitting on the ground, they're sitting in sawdust,
16 they're sitting in their own fecal matter. They eat,
17 sleep, do everything where -- in the space that they
18 live in. So -- but we ride them around in the
19 scalding water to remove the feathers.

20 Okay. But then I heard somebody say
21 earlier, we've got, you know, feathers on the pickers.
22 Now, look, if I'm an inspector and I go in and say,

1 oh, we've feathers on the pickers, now look, they
2 float around and I don't know of any other way it can
3 be done, but we need to go in and we need to look at a
4 poultry plant of the chickens riding around in a scald
5 vat with a dirty, nasty, filthy water that they ride
6 around in, and then the Agency is going to tell me to
7 go do something about a few feathers on a picker.
8 Please, get real. You know, and I don't know if any
9 tests have been performed, you know, regarding the
10 water that the chickens ride in or I say ride in, you
11 know, they go through in order to remove the feathers.
12 But, you know, is that increasing *Salmonella*? I don't
13 know.

14 MS. ESKIN: I guess that's a question. This
15 is Sandra. In a risk-based scenario, you're
16 suggesting that an inspector should be looking at that
17 water and not worrying about those feathers. Is that
18 what you're saying?

19 DR. LEECH: Which will spread more disease?

20 MR. PAINTER: That's correct. You know,
21 this is Stan again. Are we gagging at a gnat and
22 swallowing an elephant? You know, it just rode around

1 in this soupy water and then I'm going to tag the
2 plant or I'm going to punish the plant for a few
3 feathers on the rails, on the pickers?

4 DR. DENTON: I'm going to pass Joe my
5 Chairman's hat so I can say something.

6 MR. ELFERING: Mr. Chairman, just one quick
7 question. Scalding temperature of water, about 145°F?

8 DR. DENTON: 128°F to 132°F for broilers and
9 higher on turkeys.

10 MS. ESKIN: Don't they start to cook?

11 MR. ELFERING: What temperature? 128°F to
12 132°F.

13 DR. DENTON: On chickens, yeah.

14 MR. ELFERING: Swine must be about 145°F.

15 UNIDENTIFIED SPEAKER: Yeah, turkeys is
16 about 130°F, 132°F, 134°F, 132°F, I don't know.
17 Somewhere in there.

18 DR. DENTON: I understand exactly what Stan
19 is saying, and in a lot of ways I agree with him about
20 where the issues of contamination are, but having done
21 some of the earlier work back in the middle 1970s, I
22 hate to tell you --

1 DR. LEECH: That wasn't that long ago.

2 DR. DENTON: Yeah. We've looked at the
3 contamination on birds coming into the plant live.
4 We've looked at then after they go through the scald
5 tank, after they go through the picker, we looked at
6 water, and honest to goodness, the contamination
7 levels in the water would boggle your mind but if you
8 look at the net effect of what happens to that chicken
9 through that scald tank, in almost every case you get
10 around a 63 to 65 percent reduction on all of the
11 microbial populations that are on the surface of the
12 bird. Now a lot of that has to do with the effect of
13 the agitation and the rinsing and the simply taking
14 the organisms off the birds and into the water.

15 Now the water becomes terribly contaminated.
16 I mean there's no question about it. But as Stan
17 pointed out, that is to loosen the feathers so they
18 will pick. You have to do the operation in order to
19 have the feathers removed. You monitor, whether you
20 monitor the carcass, I don't think that you can
21 productively monitor the water. You need to be
22 looking at what's happening to your product, and in

1 that case, you're getting a significant bacteria
2 reduction. And further down the stream you've got
3 things like inside outside bird washers and you've got
4 a chilling process, all of which are liquid systems
5 and they also reduce microbial contamination.

6 Charles.

7 MR. LINK: I just to -- what you're saying.
8 And Chris, you mentioned earlier, bio-mapping that a
9 lot of companies are starting to do. The amazing part
10 is the scalders in and of themselves tend to be a
11 pretty strong intervention, they look pretty bad, but
12 they do kill bugs.

13 DR. DENTON: They do.

14 MR. LINK: Somehow the bugs go away. So
15 when you're looking at, and I think you're right on,
16 and part of this whole discussion is, one of the risks
17 and where should you put your attention, on a couple
18 of feathers in the picker or a process, and if that
19 process is, is the temperature what it should be, is
20 the overflow what it should be, are the birds moving
21 through there, are they sitting there, what's going
22 on. I mean those are the things that really we

1 ultimately ought to be talking about.

2 DR. BRATCHER: This is Chris Bratcher. We
3 have somebody in the room here I think that has done
4 some of that in one of the plants in my circuit. We
5 had some birds coming out with an intervention after
6 the scalding, chlorinated water, and we had some bird,
7 whole bird rinses that were less than 20 total plate
8 counts coming out of the scalding. Now there were
9 others that were higher than that, but I'm just
10 telling you, that's a considerable intervention, the
11 scalding plus things that go on in the picking room.

12 And the Avian AMA convention in Minneapolis
13 two years ago, there was a presentation, ain't nothing
14 good happens in a picking room. And one of the main
15 points of that was you have some kind of microbial
16 interventions between the pickers and the scalders and
17 even a rinse of the birds prior to going into the
18 scalding, you can get significant reductions in the
19 overall bacterial loads and it has a tremendous impact
20 at the other end of the plant.

21 DR. LEECH: Phil's been trying to say
22 something behind your back.

1 MR. DERFLER: But just in the interest of
2 full disclosure, to sort of look at this, we've
3 already done a study with ARS [Agricultural Research
4 Service] where we've looked at the microbial levels on
5 the birds coming out of the picker and we've looked at
6 them post-chill, and we're also intending to look at
7 those sorts of issues as part of the baseline that
8 we're going to be doing. So, you know, we are --

9 MR. LANGE: To follow up, Loren Lange, the
10 baseline study is going to quantify *Campylobacter* at
11 that rehang point and then a bird from the same flock,
12 you know, quantify *Salmonella* and *Campylobacter* at the
13 end of the drip line. So it's going from the
14 dirtiest, most contaminated point down to it going out
15 the door. Hopefully the -- starts maybe this month.

16 MR. FINNEGAN: So, in other words, Mike
17 Finnegan. So in other words, as assigning a risk and
18 getting back to our wheel, we're going back to a big
19 part of pathogen control, the results of this baseline
20 study. So it would be once again going back to our
21 wheel whether we have it or whether we don't, but it's
22 pathogen control of our risk, the highest risk to tell

1 us where we have to concentrate, we need to focus the
2 effort.

3 DR. DENTON: Irene.

4 DR. LEECH: Loren just said something that
5 made me wonder. What extent do you follow through the
6 plant knowing what flock, where things came from? I'm
7 bringing up tracking issues which I might muddy the
8 water, but I'm just curious. I mean with poultry, do
9 you pretty well a flock together? Do you know where
10 you're going to end and begin and so in terms of --
11 that really helps the tracing process on poultry.

12 MS. ESKIN: It's not marked in any way.

13 DR. LEECH: It's not marked. But I mean it
14 could.

15 MS. ESKIN: Well, that's another discussion.

16 DR. LEECH: Right. But that's what I was
17 curious about.

18 MR. PAINTER: Stan with the NJC. I'm not
19 speaking for industry here, but in my experience of
20 working the poultry line, the Agency -- I mean the
21 plant would change lots, and we would know when they
22 would change lots, you know, about how long it takes

1 to get there, dump the first cage. Now they're in
2 cages. So when they dump the first cage, they know,
3 you know, what grower it came from, how many birds are
4 in that lot, things of that nature. When it gets to
5 the other end of the plant, you know, you're all mixed
6 up, but while you're processing them, you pretty well
7 know because they have to change the lot tally sheets
8 and things like that. So, yeah, in the beginning
9 stages you know what grower, you know, things of that
10 nature.

11 DR. DENTON: Thank you. That was question
12 4. It's probably time to do number 5 because we still
13 have to get some sort of a summary statement coming
14 out of here.

15 Let's switch to number 5. I think question
16 5 needs a qualifying statement before we move to it.
17 On the slide that Phil presented just in advance of
18 that, it states that inspection personnel may need to
19 spend as much time verifying that process is under
20 control as they do inspecting individual carcasses.
21 And then it says, can verify control by observing
22 process, reviewing records and sampling product.

1 What comments -- question 5, what comments
2 do you have on inspection personnel performing these
3 types of tasks at slaughter?

4 DR. LEECH: Irene. I'll raise the issue of
5 making sure that they are doing it in the plant, you
6 know, not remote. I mean I know we're moving to more
7 and more electronic types of records. I'm assuming
8 that some of these reviewing records things could be
9 an electronic form or the other, but I'm also assuming
10 that the whole picture, you've got to do that at the
11 plant and see the whole picture at one time.

12 DR. DENTON: Okay. Kevin. All right. Mike
13 Finnegan.

14 MR. FINNEGAN: It says what comments do you
15 have on inspection performing these type of tasks at
16 slaughter? If you're just performing slaughter,
17 you're not going to be able to observe the whole
18 process, nor are you going to review records or do
19 sampling.

20 MS. ESKIN: Off-line does.

21 MR. FINNEGAN: Okay. So we're looking at
22 the off-line slaughter person. Okay.

1 DR. DENTON: Thank you, sir. Sandra.

2 MS. ESKIN: Sandra. Looking at the three
3 examples, meaning verify control by observation,
4 reviewing records and sampling, I would just argue
5 that sampling is particularly important more than
6 perhaps than records but -- and the more the better.

7 DR. DENTON: Now you're talking about doing
8 sampling or reviewing sampling records?

9 MS. ESKIN: I'm talking about doing
10 sampling.

11 DR. DENTON: Doing sampling. Verification.

12 MR. LINK: Charles. When you say sampling,
13 I'm assuming you're meaning taking birds off the line
14 and doing a sample to see if they're meeting the
15 requirements, and I guess you're probably leaning
16 towards *Salmonella* sampling.

17 MS. ESKIN: Microbial sampling.

18 MR. DERFLER: Can I ask a question about --
19 this is Phil Derfler. Sandra, particularly with some
20 of the things we heard yesterday, if we had access to
21 industry records, their sampling, would you still feel
22 the same way?

1 MS. ESKIN: Sandra. It would have to be
2 again if data were somehow, you know, verified by -- I
3 would want there to be at least a sufficient amount of
4 direct sampling. I don't want it to just be reviewing
5 papers or screens thing. I want them to do the test
6 to some minimal or minimum level.

7 DR. BRATCHER: Chris Bratcher. I think when
8 I look at this, I see that there are several tasks
9 here that we're asking this off-line inspector to do
10 which are basically technician type tasks, and I think
11 that that's more than appropriate and they probably
12 could spend a lot more time looking at those, but when
13 you start looking at product sampling done by the
14 plants and some of those things, I think you need
15 somebody that's qualified to be able to interpret what
16 they're seeing, and I think that becomes an area of
17 specialized personnel or supervisor that can make
18 sense of that. It doesn't mean that you can't train
19 those people to look for certain things and to alert
20 you and maybe bring that to your attention, and then
21 you can look at it, but I still think there's a need
22 for somebody with medical, scientific expertise to be

1 there to verify the data.

2 MS. ESKIN: Right. This is Sandra. You're
3 saying again even industry supported data, supplied
4 data. He's the one that brought up industry data. I
5 still want somebody with whatever the required skill
6 set doing the actual --

7 DR. BRATCHER: This is Chris again. In
8 addition to that, I've seen examples of industry
9 collecting samples, where they were not using
10 techniques and things like that, and their data was
11 actually skewed in the wrong direction because of
12 their own technician's ability and, you know, we need
13 somebody there that can have oversight and supervision
14 of that process.

15 MS. ESKIN: Again this is Sandra. I want
16 the inspectors to be doing some sampling.

17 DR. BRATCHER: I agree.

18 DR. LEECH: This is Irene questioning. So
19 there aren't standard procedures that are generally
20 agreed upon, people are doing things under non-
21 sanitary conditions and that kind of thing. It seems
22 to me that one of the first things you'd want to do if

1 you want industry collecting data is --

2 MS. ESKIN: They are collecting data now.

3 DR. LEECH: Right, but I mean that you're
4 using, is that you've got standards how that's done.

5 DR. BRATCHER: And -- Chris again. In
6 response to that, there are some plants that are not
7 large entities --

8 DR. LEECH: Right.

9 DR. BRATCHER: -- that are doing testing and
10 those people, if the person's not there that day that
11 normally does the testing, may not know what they're
12 doing.

13 DR. DENTON: Okay. I've got two, and I
14 don't know who came first. Stan or --

15 MR. PAINTER: Kevin.

16 DR. DENTON: Kevin.

17 MR. ELFERING: Kevin Elfering. One thing I
18 think we want to kind of be a little wary about is I
19 don't necessarily agree that additional testing is
20 good. The more testing is not necessarily going to
21 make a safer product because again we're looking at
22 poultry that 80 percent is contaminated in the

1 marketplace today with *Campylobacter*. So doing
2 additional sampling is not going to reduce the risk to
3 the consuming public. I think we have to maintain
4 that we're getting the necessary samples to do the
5 *Salmonella* performance standards, SPS, and make sure
6 that they're being completed, and really is going to
7 give you a good assessment of the facility and what
8 they're doing.

9 MS. ESKIN: This is Sandra. We don't want
10 less testing.

11 MR. ELFERING: No. We want to make sure
12 we're meeting what is required to complete those
13 *Salmonella* performance standards, the SPS. So if it's
14 going to be on a priority, it would be to meet those.

15 DR. DENTON: Stan.

16 MR. PAINTER: Let me, let me expand a little
17 bit on what Chris had said earlier. I agree with a
18 portion of it, and I disagree with a portion of it. I
19 think that everybody needs to be involved with the
20 process because a lot of times we don't have a
21 supervisor in the plant when it comes time to take the
22 sample, and I know when we first started taking them

1 in the field, we were shorthanded, and I was a GS-7,
2 and I was on the floor with the supervisor and the
3 supervisor said here, read this and then you and I'll
4 perform this test together, and that was my first
5 experience in doing that. And I actually walked the
6 supervisor through, you know, what I had read and we
7 done that together, you know, and in a lot of cases in
8 doing them, you know, we -- in my experience, when the
9 plant does one, we go with them, you know, and we go
10 with the plant, and if there is something we see that
11 could cause a tainted sample, we point that out. We
12 say, look, we need to redo this because, you know, we
13 do a split sample. We give them ours, they give us
14 theirs. We send, you know, to the lab and vice versa.
15 And, you know, I think that everyone needs to be
16 involved in the process of taking and doing the
17 samples, you know.

18 DR. DENTON: Loren.

19 MR. LANGE: Yeah, I just have one comment
20 that sort of goes back to the role of what FSIS needs
21 to do, in verifying that the interventions are working
22 effectively and there's, you know, I do hear once in a

1 while there's sort of an urban legend, that maybe
2 interventions are working as well and we're not
3 conducting the SPS as they are conducting the SPS, and
4 we need to make sure interventions are being applied
5 consistently, because people will call into question
6 some of our data, you know, because it's questioning
7 whether the interventions are working and so we need
8 to be able to dispute that urban legend. We need to
9 be able to do that.

10 DR. DENTON: Mike.

11 MR. FINNEGAN: Mike Finnegan. By the way, I
12 see it as if, okay, through our testing we have 80
13 percent chickens with *Campylobacter*. So what's the
14 best thing we can do is to control that with
15 temperature, with cooling, with getting them birds
16 down as cold as possible as quick as we can just so
17 the bacteria won't multiply. I mean *Campylobacter*
18 will not multiply at 40 degrees or less. I mean
19 that's really our only -- I mean that would be a very
20 big risk that we would concentrate on given the fact
21 that that high percentage has *Campylobacter*.

22 DR. DENTON: Chris.

1 DR. BRATCHER: Chris Bratcher. I'm not sure
2 that at some point we shouldn't, industry and
3 everybody else should not address *Campylobacter* and do
4 something about that because it is a problem. It's a
5 serious food-borne issue and if people mishandle
6 product in their home, in their kitchens, it's a
7 factor that needs to be addressed, and I think at some
8 point, the Agency might be forced to look at that and
9 set a performance standard for *Campylobacter*.

10 UNIDENTIFIED SPEAKER: I think *Campylobacter*
11 is the leading cause of food-borne illness.

12 DR. BRATCHER: Yeah, and the person that
13 develops *Campylobacter*, a *Campylobacter* infection,
14 develops no immunity to that bacteria. So you can get
15 it again the very next day from handling the same
16 things in the kitchen again.

17 DR. LEECH: Or it --

18 DR. BRATCHER: Yeah.

19 UNIDENTIFIED SPEAKER: It comes from
20 intestines. Like *Salmonella*, that's where it
21 originates, *E. coli*.

22 DR. DENTON: Stan.

1 MR. PAINTER: Stan Painter. And I'm in full
2 agreement with Chris, the Agency is going to have to
3 lead the way, you know, the Agency in my opinion is
4 going to have to say, you know, to the plants, we're
5 willing to do testing, now you do testing. You know,
6 the Agency is going to have to be involved themselves
7 rather than saying here, you do it, you give us the
8 data. You know, we're doing virtually no testing for
9 *Campylobacter* period. So we're going -- in my
10 opinion, we're going to have to lead the way as far as
11 the Agency.

12 MR. LINK: This is Charles Link. Didn't
13 Phil say he was going to do that on this baseline
14 coming up?

15 MR. DERFLER: Yes. Don't expect me to do
16 the analysis though.

17 MR. LANGE: This is Loren Lange. The first
18 request for samples for the shakedown should be mailed
19 out I think next week. And when we start a baseline
20 study, run it for a little while, without calling
21 those the official one year results, just to work out
22 the kinks, the sample process, this will be new, this

1 will be different than the traditional collecting of a
2 whole bird randomly under the drip line. The sample
3 collectors will having to be pick two birds, you know,
4 from the same flock and get the right forms and
5 information filled out on which one and get them to
6 the labs. We always run it for a while to make sure
7 it's working.

8 DR. HARRIS: Joe Harris. For those of you
9 who sort of raised your eyebrows as he described that,
10 having seen them go through that with 0157 testing on
11 beef trim, that was a 60-day shakedown. Actually it
12 was amazing what all kind of complications were
13 identified and corrected and when the actual
14 regulatory sample started, it went very smoothly as I
15 recall.

16 MS. ESKIN: Sandra. Joe, it wasn't the
17 testing. It was the sophisticated, regulatory
18 language of shakedown that made us all go --

19 DR. HARRIS: Kind of a double meaning work
20 that's probably maybe even appropriate.

21 DR. DENTON: I've kind of lost control of
22 this thing.

1 (Laughter.)

2 DR. LEECH: So how's this different from a
3 pilot?

4 MR. LANGE: A pilot implies that you're
5 testing something that you may or may not go forward
6 with, and we are going forward with the baseline
7 because we start the shakedown phase. I mean there's
8 no plan to stop it.

9 DR. DENTON: Okay, folks. You all have done
10 such a good job, we only have one question left, and
11 it's question number 6. What comments do you have
12 about including process control as a means of
13 identifying and addressing emerging risks? And I'm
14 not quite sure that we didn't already address this.

15 DR. LEECH: This is Irene, and I know the
16 one that I would have is that it seems to me just like
17 I make my graduate students do what I call a pilot
18 test, and I think I define pilot different, and it
19 seems like pilot has an awful lot of political baggage
20 around here. So if you can find me another name for
21 it, but my point is that whatever we're looking at
22 putting in place, it seems to me we need to do a

1 pilot, a shakedown, or something or other, with a
2 portion of it before we go big time with everybody,
3 and it just seems to me that that makes sense.

4 MR. DERFLER: Can I --

5 DR. LEECH: He's actually going to give me
6 the right name for it.

7 MR. DERFLER: No, I actually screwed up in
8 writing this question -- raising this question. What
9 I was really asking is what's the best way for our
10 people to react in order to -- if they find a problem,
11 in doing a test, they find a problem, what should they
12 do.

13 DR. DENTON: We have a different question.

14 DR. LEECH: That is a different question.

15 MS. ESKIN: Sandra. That's what you're
16 focusing on, the emerging, meaning something they
17 haven't dealt with before?

18 MR. DERFLER: Or whatever. If they find --
19 what are they supposed to be doing, how do we deploy
20 them, what are the tasks they should be performing and
21 if they find a problem, what should they do.

22 MR. LINK: This is Charles, and I'm going to

1 steal some legal terms. It depends on exactly what
2 we're talking about. I mean when I read the question,
3 it makes sense to me that from a process control
4 perspective, if we're either looking at these process
5 steps and we know what the parameters are, we're
6 outside those parameters, that might be an indicator
7 that means the system is not working like it should.
8 We may have a problem, we ought to do something. Raise
9 a flag, ring a bell, stop the line, tap somebody on
10 the shoulder, I don't know. I guess it depends on
11 what that issue is.

12 MR. ELFERING: Mr. Chairman.

13 DR. DENTON: Yes, Kevin.

14 MR. ELFERING: Kevin Elfering. One thing I
15 think is just getting the plant involved right away.
16 You know, I think one of the things, if I remember
17 right, one of the first *Salmonella* performance
18 standards were done, the plant never got the results
19 until the set was completed, and I think now, I
20 believe now you're letting the plants know right away,
21 and I think that's some of the things that the
22 inspectors need to be able to do is get the plant

1 involved.

2 UNIDENTIFIED SPEAKER: Get plant management
3 involved.

4 MR. ELFERING: Get plant management involved
5 as quickly as possible, especially if it's a
6 significant health risk, and you have the tools to
7 either not apply the marks of inspection or tag
8 product or equipment, and it's all going to depend on
9 the severity.

10 DR. DENTON: Chris.

11 DR. BRATCHER: Phil, from my perspective,
12 working in the field, it seems like we always figure
13 this out for your guys afterwards anyway. You send
14 something to us and then we always make it work after
15 the fact, but I think he's on a good point. I think
16 if you have maybe some industry people and your
17 employees that could look at these things before you
18 put them out to the field to try to implement, and
19 shoot holes in it to see if there's any problems
20 there, I know we're trying to do and I'm going to
21 mention what we talked about earlier, but if we could
22 just kind of take some of these things and tell you if

1 there's a flaw or something that's missing, or
2 something that we've identified as an emerging risk or
3 a problem in the field that you haven't included in
4 your directive or notice, we might be able to help
5 make this a little bit smoother process before.

6 MR. MILTON: Billy Milton, FSIS. How do you
7 propose we do that?

8 DR. BRATCHER: Well, one that we started
9 doing, Chris Bratcher again, is through sending out
10 the notices and directives for us to review prior to
11 the fact, you know, when they're still in the draft
12 stage.

13 MR. MILTON: So when it's still in the draft
14 stage.

15 DR. BRATCHER: Yeah, and so -- and, for
16 example, in our Association, we have some people that
17 we have identified pretty much experts in one area or
18 another, and we try to get those to them to see if
19 there's anything that's a time bomb, you know, is this
20 going to work or are your people that you supervise
21 going to be able to make this work the way it's
22 written? Are they going to understand it?

1 MR. MILTON: Billy Milton. I like the idea
2 but, Stan, does that impact upon a by-pass of the
3 Union, here associations are getting the draft notices
4 of directives before the employee union is placed on
5 notice?

6 MR. PAINTER: Stan Painter. What would be a
7 problem with giving it to both simultaneously?

8 MR. MILTON: That's, that's what I mean.

9 DR. BRATCHER: Chris again. Well, we're an
10 organization of supervisors and managers. So we're
11 part of the management team.

12 MR. MILTON: Right.

13 DR. BRATCHER: So I mean he could complain
14 that we had that before, but he might be one of the
15 guys that I might go ask a question about it and say,
16 Stan, does this make sense to you? Do you think you
17 can do this? You know, or one of his people that's
18 going to have to implement something they're going to
19 do. So as a manager, I think it would behoove you to
20 make it available for me and ATSP also because they
21 may have some entirely different slant, and they're an
22 organization of managers and supervisors also.

1 MR. FINNEGAN: Mike Finnegan. One of the
2 things that -- I can't remember if it was the BSE-SRM
3 deal, but it was required to have an awareness meeting
4 and both sides had to sign off on it. Now that worked
5 fairly well, because we sat down at a table and
6 explained what was coming off, and I think the
7 inspection and the plant had to sign off that we had
8 an awareness meeting. That worked very well for us.

9 MR. MILTON: It can work. I would caution
10 the Agency sending the draft to ATSP because they're
11 an association of technical and professional
12 employees. Regarding NAFV, there's no issue. If the
13 Agency, Dr. Masters and Bryce Agree, you know, I can
14 make it go. We can give you drafts and allow you to
15 comment on drafts. That's not an issue. I mean I
16 can't speak to how the union and we definitely would
17 not give directives to ATSP --

18 DR. BRATCHER: Right, and we've challenged
19 that and proven that we're --

20 MR. MILTON: -- because they're not
21 primarily an organization of supervisors or managers.
22 And they're not entitled to advance notice and an

1 opportunity to comment on proposed changes or
2 condition of employment. NAFV is considered an arm of
3 the Agency because they're primarily managers and
4 supervisors.

5 DR. DENTON: Okay. I think at that point,
6 that we need to declare a short recess while we have a
7 drafting session of what we've captured so far, and
8 then I've got notes to work from here, and see if we
9 can come back to this. We may want to read down
10 through and if anyone can add to what I've said here,
11 with regard to that first question and let me get back
12 over here -- I couldn't remember question number 1.

13 (Laughter.)

14 DR. DENTON: That being said, it says are
15 there things other than condition of carcass,
16 pathogens, and process control that the Agency should
17 be accomplishing in a risk-based approach to
18 inspection at slaughter? And we got into a discussion
19 on consumer specs, OCP sorts of things and re-
20 evaluation of finished product standards. Plants with
21 extended cleanup, microbial criteria as part of
22 sanitation. That's part of the comments. One of the

1 things that did come out is a recommendation that we
2 archive based on food safety rather than economic and
3 quality information. And we should take into
4 consideration a plant that has installed intervention
5 techniques with regard to the things that we should
6 consider, other than those three things that were
7 listed in the question.

8 DR. LEECH: But now as an intervention,
9 we're thinking of what the impact of that intervention
10 is, just the fact that it's there.

11 DR. DENTON: That comes under the process
12 control question. Here we're talking about things
13 that we probably need to emphasize as being part of
14 what's added to this which is a little short list.
15 And that we need to prioritize based on food safety
16 issues.

17 Okay. B of that question, how can risk be
18 factored into the accomplishment of these other
19 purposes? It says prioritize risk from most important
20 to the least important based on human health issues,
21 and I don't need to know that we need to extend beyond
22 that.

1 Question number 2 is regarding the Agency
2 deployment in poultry slaughter. What is the best way
3 for the Agency to deploy its personnel to accomplish
4 purposes of inspection? Now this one gets a little
5 longer. Examine risks where they occur, focus
6 attention on the highest risk operations, verification
7 of intervention strategies and technologies. This
8 requires well educated personnel to interpret the data
9 coming from those intervention applications, maintain
10 the on-line inspection as it can be done to meet the
11 statute, look more broadly at food safety across the
12 system. Insure plants who adopt anti-microbial
13 applications are actually doing this.

14 DR. LEECH: The only --

15 DR. DENTON: Okay. Irene.

16 DR. LEECH: The only wording there that I
17 would wonder about is, and I don't -- you said, the
18 inspection, individual inspection as it can be done.
19 I'm not sure what word -- whether that came through as
20 us saying we still didn't want for that to be
21 accomplished or --

22 DR. DENTON: We do.

1 DR. LEECH: I know. To assure or -- just
2 listening to it, as he read it.

3 DR. DENTON: I'm reading from some pretty
4 crude notes.

5 DR. LEECH: Okay.

6 DR. DENTON: Now I will make the statement
7 again. The Committee says, the Subcommittee says we
8 need to maintain the on-line inspection process as it
9 can be done to meet the statute of carcass-by-carcass
10 inspection.

11 MS. ESKIN: As required by the statute.

12 DR. DENTON: As required. Okay. And I may
13 have gotten a couple of things over in that that may
14 belong down in 3, but we'll sort that as we type.

15 Question number 3, what comments do you have
16 on the use of this type of approach to guide how FSIS
17 deploys its inspection resource in slaughter
18 operations? Look more broadly at food safety across
19 the entire system, insure that plants that adopt anti-
20 microbial interventions are actually utilizing the
21 intervention. And that came up again late in our
22 discussion with Loren.

1 I don't know quite how to capture this one.
2 Chris made a statement about one plant that uses no
3 interventions but because of things that they're doing
4 in the pre-morbid side or in the live side, are
5 resulting in some really good microbiological data I
6 guess is the right way to put that. It probably
7 doesn't.

8 DR. LEECH: It sounded like it was just a
9 comment.

10 DR. DENTON: Yeah.

11 DR. BRATCHER: Yeah, I think that's right.

12 MR. LINK: This is Charles. I mean it's
13 part of an overall management process and so that's
14 why I kind of get hung up on the -- we were spending a
15 lot of time talking about the microbial interventions.
16 You may not have one but you still manage your process
17 to the point that you don't need it. So in almost
18 every question, you said and do they have one, and if
19 they do, they get a check, and if they're doing it,
20 they get another check, but the guy that's not doing
21 it --

22 MS. ESKIN: It should be the end result.

1 DR. DENTON: Joe.

2 DR. HARRIS: The best intervention ever
3 invented was keeping it from getting on the carcass to
4 start with.

5 MR. LINK: I know, I'm saying that that's
6 part of that whole process, how you manage your
7 process but I'm okay with, hey, do you have an
8 intervention but really at the end of the day is the
9 results, if you get it done or not.

10 MS. ESKIN: Again, the point being -- this
11 is Sandra, you can get the end result you want
12 sometimes using other things besides interventions.

13 MR. PRETANIK: This is Steve Pretanik.
14 That's the whole basis of process control really.

15 MS. ESKIN: You choose how you do it, yeah.

16 DR. LEECH: This is Irene. It's also the
17 issue of things being done before it got to the plant.

18 DR. DENTON: Okay. Question number 4, tasks
19 performed by inspection personnel. What effect should
20 considerations of risk have on what we ask our
21 inspection program personnel to do? And we talked
22 about product inherent risk being a constant, across

1 the board, with regard to poultry. We talked about
2 the establishment control of risk which really alludes
3 to the process that the establishment utilizes.
4 Prioritize based on risk associated with public health
5 concerns. I've got two here that I put stars by them
6 and I haven't figured out just exactly what we do.
7 Kevin made a comment about cause of human illness
8 being *Salmonella* and *Campylobacter* and underneath that
9 I wrote, focus on processes that can cause increases
10 or result in reductions in those two particular
11 pathogens. So I think what we're getting at here is a
12 pathogen control concept in which we focus on those
13 processes that may result in either an increase or a
14 reduction so that we optimize one and control the
15 other. Optimize the one that reduces the contaminant
16 and try to control the one that may result in an
17 increase. It's going to have to be wordsmithed a
18 little bit.

19 And then the final one -- it's not the final
20 one. The Agency should utilize principles for
21 assigning inspection duties in the plant and the
22 utilization of bio-mapping which gives the opportunity

1 to achieve microbiological reductions in the process.
2 That's one that Charles and Chris both talked about
3 quite a bit. And then someone from FSIS mentioned
4 that baseline will quantify *Salmonella* and
5 *Campylobacter* and we can use that to focus on issues
6 related to process control. And that's an Agency --
7 Agency data.

8 Okay. So far, so bad. Question number 5,
9 what comments do you have on inspection personnel
10 performing these types of tasks at slaughter? As we
11 talked about, they can verify by observing the
12 process, reviewing the records and sampling the
13 product was the gist of the question. Insure that
14 records are being kept at the plant even if they are
15 electronic and accessible by FSIS. Minimum -- wait a
16 minute. I've got too many changes in that particular
17 statement. It was a concept that Sandra mentioned.
18 Sampling of verification microbial data at a minimum
19 should not be reduced. If there is data from industry
20 that is made accessible to FSIS, it needs to be
21 verified. In conjunction with that, done -- the
22 evaluation done by qualified personnel from the

1 Agency. They need to be well qualified to interpret
2 that data. And I think that was about it on that one.
3 That's was pretty much the comments.

4 And then the last question Irene referred to
5 when we had what comments do we have, this is the one
6 that Phil rephrased the question.

7 If there is a problem with regard to the
8 process, what do the inspectors do? What should the
9 response be? And I think this is one that Kevin
10 mentioned right off the bat that the initial reaction
11 is to get management involved as soon as possible so
12 that industry and FSIS review this process to find out
13 what's going on at the earliest potential time to make
14 adjustments in that process.

15 DR. HARRIS: Joe. We're talking about if
16 something is identified that is not a regulatory non-
17 compliance. Obviously non-compliance generates its
18 own response.

19 DR. DENTON: Generates its own response.
20 We're talking about something in the review of the
21 process or whatever. It triggers something that looks
22 like a potential, then FSIS needs to bring it to the

1 attention of management.

2 MR. DERFLER: You ought to put in the thing
3 about non-compliance.

4 DR. DENTON: Yeah. Okay. The only other
5 comment I had was the discussion about allowing the
6 review of notices of directives while they were still
7 at the draft stage. I don't know if that's anything
8 that has any business --

9 UNIDENTIFIED SPEAKER: I doubt if --

10 DR. DENTON: -- getting into that.

11 Okay. How about in the morning?

12 MS. ESKIN: How about first thing in the
13 morning? If anybody wants to look at it --

14 DR. DENTON: Yeah, generally we can look at
15 it in the morning.

16 COURT REPORTER: Are you officially done?
17 Is this a break and you're coming back or --

18 DR. DENTON: We're done.

19 (Whereupon, at 5:00 p.m., the meeting was
20 concluded.)

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C E R T I F I C A T E

This is to certify that the attached proceedings
in the matter of:

NATIONAL ADVISORY COMMITTEE ON
MEAT AND POULTRY INSPECTION
SUBCOMMITTEE NUMBER 2
USING RISK IN SLAUGHTER OPERATIONS

Washington, D.C.

October 12, 2006

were held as herein appears, and that this is the
original transcription thereof for the files of the
United States Department of Agriculture, Food Safety
and Inspection Service.

KEITH McGUIRE, Reporter
FREE STATE REPORTING, INC.