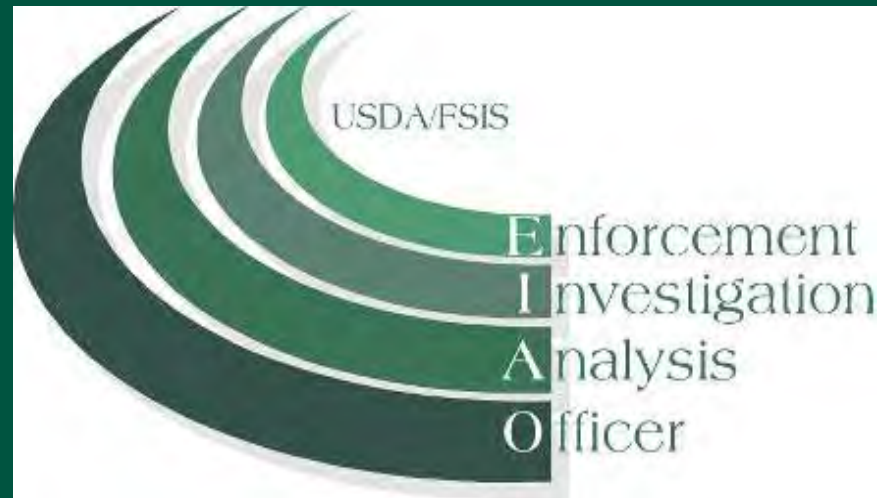


SBREFA Outreach to Small and Very Small Plants

EIAO Training



Introduction

- Small Business Regulatory Enforcement Fairness Act (SBREFA)
 - Signed into law March 29, 1996
 - Gives small/very small establishments a greater voice in development and enforcement of regulations

Definitions

- Small Plant
- Very Small Plant
- Ombudsman



Two Key Areas of SBREFA

- Advocacy
 - Outreach and compliance assistance
- Enforcement Fairness
 - To ensure non-retaliation for regulated establishments

Advocacy-outreach & compliance

- Goal – Provide technical guidance and assistance to small and very small meat, poultry establishments, and egg plants
 - Constitute vast majority of meat and poultry plants in U.S.
 - Usually need technical guidance and assistance in HACCP and food safety

Challenges

- Small and Very Small Plants may:
 - Lack resources
 - Lack knowledge
 - Have possible language barriers
 - Lack strong Associations
 - Believe that old methods result in safe products

Common Issues

- Lack of scientific support for hazard analysis and reassessment
- Validation – Reliance on literature without validation in the plant’s environment
- “We’ve done it this way for years - no one has died from eating our product.”
- “Government makes new requirements to put small plants out of business”
- Cannot leave plant for training

Small and Very Small Plant Outreach

- EIAO's play a vital role in advocacy
 - Key position to provide outreach to small and very small plants
- Included in EIAO job description and performance elements
- Majority of issues deal with food safety systems design
 - Supporting Documentation
 - Initial Validation
 - More Complex

EIAO's Role in Outreach

- Outreach visits
 - For outreach assistance - not FSA
 - Promotes open communication
 - May perform while in the area performing FSA at another plant



Outreach Visits

- Promote understanding of regulatory requirements
- Explain what to expect during FSA
- Provide FSIS materials/resources
 - Share guidance material/contact lists
 - Carry FSIS supplied material with you
- Refer plants to Contacts/Coordinators
 - They can do what FSIS cannot

Outreach Visits-2

- Do not have to implement outreach we provide but must meet regulatory compliance
- Document, document, document...

What EIAO's Don't Do

- Do not write the HACCP Plan or SSOP
- Do not dictate CCP's
- Do not create additional burdens
- Do not hesitate to involve Contacts or Coordinators
 - They can provide direct assistance

Other EIAO Outreach Activities

- Participate in HACCP courses or roundtables held at universities
- Collaborate with others to hold workshops for small plants
- Food Safety Summits
- Conferences for IPP



Outreach Resources

- Outreach and Partnerships Division of OPACE
 - Prepares compliance materials
 - Serves
 - FSIS employees
 - Small plant owners/operators
 - State and local governments

Resources

- Extensive library of free outreach materials
 - In English and Spanish, some in Chinese, Korean, and Vietnamese
 - Guidebook for Preparation of HACCP Plans
 - Generic HACCP Models available
 - Booklets, videos and CDs on HACCP and Food Safety

To Get Materials

- Email FSIS.Outreach@usda.gov
- FSIS web page
 - <https://www.fsis.usda.gov/inspection/compliance-guidance/small-very-small-plant-guidance/food-safety-resources-small-and-very>

Other Resources



- In addition to the role of the EIAO:
 - State Outreach and Technical Assistance Division (SOTAD) of OPACE works with Contacts and Coordinators, associations, and others
 - List of HACCP Coordinators in each state can be accessed from the small plant webpage
<https://www.fsis.usda.gov/inspection/compliance-guidance/small-very-small-plant-guidance/small-plant-help-desk>

Other Resources - 2



- In addition to the role of the EIAO:
 - In November 2009 FSIS began to offer
 - Toll-free Small Plant Help Desk
 - One stop shop for questions about how to make sure products are safe, wholesome, properly labeled
 - Provide a portal to other services such as AskFSIS
 - 1-877-FSISHelp
 - Email Infosource@fsis.usda.gov
 - FSIS Website
- <https://www.fsis.usda.gov/inspection/compliance-guidance/small-very-small-plant-guidance/small-plant-help-desk>

Other Resources -3

- OFO has developed a start up package to guide new small and very small plants thru the process
 - Beginning with applying for the Grant of Inspection
 - Available at any district office

Enforcement Fairness

- National Ombudsman and Regulatory Fairness Boards
 - Forum for small businesses to report compliance or enforcement experiences with Federal regulatory agencies



National Ombudsman and Fairness Boards

- Avenues of appeal for small entities
- Do not replace FSIS appeal processes
- Cannot overturn or adjudicate Agency decisions
- Focus on “unfairness” in regulatory decisions or enforcement actions

Enforcement Fairness -2

- Agency role
 - Ensure non-retaliation
 - Attend Fair Regulatory Enforcement Hearings if issue raised
 - Provide official responses to complaints or comments

The logo for the Food Safety and Inspection Service (FSIS) is displayed in a large, bold, blue font with a red outline. The letters are stylized and blocky.

Summary

- Provide compliance assistance to small and very small plants
- Provide information on outreach and available resources
- Attend meetings, roundtables, and workshops as directed
- Communication is the key!

SBREFA Small and Very Small Plant Outreach

Questions

