

UNITED STATES DEPARTMENT OF AGRICULTURE

+ + + + +

NATIONAL ADVISORY COMMITTEE ON

MEAT AND POULTRY INSPECTION

+ + + + +

PLENARY SESSION

+ + + + +

September 16, 2024, Day 1  
10:00 a.m. - 11:00 a.m. ET

Microsoft Teams

Facilitator and Presenter

KATRINA GREEN  
Designated Federal Officer  
Office of Policy and Program  
Development

AARON BECZKIEWICZ

EMILIO ESTEBAN, Under Secretary  
Office of Food Safety  
United States Department of Agriculture

ANGELICA MARRERO SANCHEZ  
Economist and Deputy Director  
Policy and Programs Development

SARAH MILCHMAN  
Economist  
Policy and Program Development at FSIS

**Free State Reporting, Inc.**  
1378 Cape St. Claire Road  
Annapolis, MD 21409  
(410) 974-0947

MELISSA HAMMER  
Director of Regulations Development Staff  
Office and Policy and Program Development Staff  
at FSIS

COMMITTEE MEMBERS

DR. MARY ANNE AMALARADJOU, Associate Professor  
University of Connecticut

SHARON BIRKETT  
OSI Group

DR. DIANNA VIOLA BOURASSA  
Auburn University

DR. BYRON D. CHAVES  
University of Nebraska - Lincoln

DR. VANESSA COFFMAN  
Stop Foodborne Illness

DR. JAMES RICHARD DILLON, Director  
State Meat Inspection Program for the state of  
Texas

SCOTT LEE FILBRANDT

CASEY GALLIMORE  
Meat Institute

DR. JAMES H. HOLLIS, Director  
South Carolina State Meat Inspection Program

PAUL KUBER  
Washington State University

ANASTACIA MARIE LARKIN  
Google Foods

PATRICK ROBINETTE  
Micro Summit Processors

DR. JAMES ROGERS  
Office of Field Operations

**Free State Reporting, Inc.**  
1378 Cape St. Claire Road  
Annapolis, MD 21409  
(410) 974-0947

DESIREE CLAIRE ANNE WINELAND, Associate  
Director  
Prevention for the Division of Foodborne,  
Waterborne, and Environmental Disease at CDC

DR. BYRON WILLIAMS  
Michigan State University

HILARY WHITMAN, Associate Director  
Prevention for the Division of Foodborne,  
Waterborne, and Environmental Disease at CDC

## I-N-D-E-X

AGENDA ITEM	PAGE
<b>Opening</b>	4
Ms. Katrina Green	
<b>Welcome</b>	10
Dr. J. Emilio Esteban, Under Secretary Office of Food Safety United States Department of Agriculture	
<b>Agency Updates</b>	13
Ms. Angelica Marrero Sanchez, Deputy Director Office of Policy and Program Development United States Department of Agriculture Food Safety and Inspection Service	
<b>NACMPI Charge</b>	24
Ms. Sarah Milchman, Economist Office of Policy and Program Development United States Department of Agriculture Food Safety and Inspection Service	
<b>NACMPI Charge</b>	32
Ms. Melissa Hammar, Director Regulations Development Staff Office of Policy and Program Development United States Department of Agriculture Food Safety and Inspection Service	

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

(10:00 a.m.)

MS. GREEN: Good morning, everyone. Welcome to the plenary meeting of the National Advisory Committee on Meat and Poultry Inspection, commonly referred to as NACMPI. The purpose of the committee is to provide advice to the secretary concerning state and federal programs with respect to meat and poultry inspection, food safety, and other matters that fall within the scope of the Federal Meat Inspection Act and Poultry Products Inspection Act.

My name is Kat Green and I work within the USDA Food Safety and Inspection Service Office of Policy and Program Development as the Director of Resource and Administrative Management Staff and also serve as the designated federal officer for NACMPI.

Before we get started, I want to provide a few housekeeping items for everyone. First, please note that this morning's plenary meeting is being recorded. FSIS will post the recording and transcripts when they become available on the FSIS website at [www.fsis.usda.gov](http://www.fsis.usda.gov).

With the exception of our committee members and the designated speakers, all other attending microphones were automatically muted when you logged

1 in and you will not have the ability to use your  
2 camera during the meeting, except if you are making  
3 public comment.

4 Also note, a sign language interpreter will  
5 be present for the opening and closing plenary  
6 meetings. There will be a comment period today for  
7 members of the public. If you preregistered to speak  
8 I will call on you. You may need to move your cursor  
9 to make the toolbar appear if needed. You will be  
10 unmuted when it is your turn to speak.

11 At that time, a pop-up message will appear.  
12 You will need to accept this message in order to  
13 unmute yourself and turn on your camera. As time  
14 allows, we will open up the comment period to those  
15 who wish to comment but did not preregister.

16 If this applies to you, feel free to place  
17 yourself in the queue during the public comment period  
18 by utilizing the raised hand feature. For our phone  
19 line audio-only attendees, you'll need to press star  
20 five to raise your hand during the public comment  
21 period, then star six to unmute.

22 Please introduce yourself by providing your  
23 name and affiliation before providing public comment.  
24 Each person will be provided three minutes to make  
25 their comment and then we will move to the next person

1 in the queue.

2 Lastly, the chat feature is available for  
3 attendees to use. Comments made in the chat will be  
4 shared with the committee. In addition, attendees may  
5 submit written comments according to the options and  
6 directions outlined in the federal register notice  
7 announcing this meeting.

8 We have a full day planned on the agenda  
9 today and are going to do our best to stay on  
10 schedule. I will now proceed by taking roll of the  
11 NACMPI committee members and will call names in  
12 alphabetical order. When your name is called, please  
13 ensure that your camera is on and announce your  
14 presence by stating here or present, and your  
15 affiliation.

16 Starting with Dr. Mary Amalaradjou. Dr.  
17 Amalaradjou? I think she may be having a technical  
18 problem. Okay. I'll come back to Dr. Amalaradjou.  
19 William Battle. Please announce your presence by  
20 stating here or present, please, and your affiliation.  
21 Sharon Birkett.

22 MS. BIRKETT: I'm present and I'm with OSI  
23 group.

24 MS. GREEN: Dr. Bourassa.

25 DR. BOURASSA: Good morning. I'm present.

1 I'm with Auburn University.

2 MS. GREEN: Thank you. Dr. Byron Chaves.

3 DR. CHAVES: Good morning, everybody. Byron  
4 Chaves, present, with the University of Nebraska -  
5 Lincoln.

6 MS. GREEN: Thank you. Dr. Vanessa Coffman.

7 DR. COFFMAN: Hi, Vanessa Coffman, present,  
8 Stop Foodborne Illness.

9 MS. GREEN: Okay. Thank you. Dr. James  
10 Dillon. Okay. I see he raised his hand. It looks  
11 like you may be having -- Dr. Dillon?

12 MR. DILLON: Yes, I'm here.

13 MS. GREEN: Great. Thank you.

14 MR. DILLON: Dr. James Dillon, Director of  
15 the State Meat Inspection Program for the State of  
16 Texas.

17 MS. GREEN: Thank you. Scott Filbrandt. It  
18 looks like he dropped off.

19 UNIDENTIFIED SPEAKER: You should be able to  
20 unmute your mic now, Scott.

21 MS. GREEN: It looks like he fell off.

22 UNIDENTIFIED SPEAKER: No, he's got his hand  
23 raised.

24 MS. GREEN: Oh, he does.

25 UNIDENTIFIED SPEAKER: You can unmute your



1 mic. Okay. We'll come back. Casey Gallimore.

2 MS. GALLIMORE: Present, meat institute.

3 MS. GREEN: Thank you. Dr. Joseph Harris.

4 Dr. James Hollis.

5 DR. HOLLIS: Yes, good morning. Jim Hollis.

6 I'm the Director of the South Carolina State Meat

7 Inspection Program.

8 MS. GREEN: Okay. Thank you. Dr. James

9 Kincheloe.

10 MR. KUBER: Paul Kuber, affiliated with

11 Washington State University.

12 MS. GREEN: Okay. Anastacia Larkin.

13 MS. LARKIN: Morning. Anastacia Larkin,

14 Google Foods.

15 MS. GREEN: Ali Mohseni-Motlagh. Patrick

16 Robinette.

17 MR. ROBINETTE: Patrick Robinette, Micro

18 Summit Processors.

19 MS. GREEN: Thank you. Dr. James Rogers.

20 Teresa Schwartz. Dr. Byron Williams. Desiree

21 Wineland.

22 DR. WILLIAMS: Byron Williams, here,

23 Michigan State University.

24 MS. GREEN: Great. Thank you.

25 DR. WILLIAMS: Finally, I'm here.

**Free State Reporting, Inc.**

1378 Cape St. Claire Road

Annapolis, MD 21409

(410) 974-0947

1 MS. GREEN: We're glad you're able to be  
2 here with us.

3 DR. WILLIAMS: Thank you. Technical  
4 difficulties. Sorry.

5 MS. GREEN: That's okay. Desiree Wineland.  
6 Dr. Hilary Whitham.

7 MS. WHITHAM: Hilary Whitham, present,  
8 Associate Director of Prevention for the Division of  
9 Foodborne, Waterborne, and Environmental Disease at  
10 CDC.

11 MS. GREEN: Thank you. John Hachinohe. A  
12 few people who were having some technical difficulty  
13 with -- Dr. Mary Amalaradjou, are you able to unmute  
14 your mic now?

15 DR. AMALARADJOU: Yes, it's working now.  
16 Thank you. This is Mary Anne Amalaradjou, Associate  
17 Professor University of Connecticut.

18 MS. GREEN: Thank you. Katrina -- you're  
19 frozen, Katrina. It wouldn't be Teams.

20 UNIDENTIFIED SPEAKER: Does somebody else  
21 have the list of the NACMPI members that we still need  
22 to confirm?

23 UNIDENTIFIED SPEAKER: Desiree Wineland's  
24 microphone should be allowed now.

25 MS. WIELAND: Thank you. I hear you loud

1 and clear.

2 UNIDENTIFIED SPEAKER: I made it through my  
3 list. I can go off my list. She left off at -- did  
4 we do Dr. James Hollis?

5 DR. HOLLIS: Yes, she had already called my  
6 name but I'm still here.

7 UNIDENTIFIED SPEAKER: Okay. All right.  
8 Just making sure.

9 DR. HOLLIS: Sure. Yeah. No problem.

10 UNIDENTIFIED SPEAKER: I know she left off  
11 with Ms. Schwartz. Ms. Schwartz didn't make it.

12 MS. GREEN: Okay. I am back. I lost  
13 connectivity. But I'm back again, now. So, we will  
14 proceed. We have 14 members present, which means we  
15 have a quorum for today's meeting.

16 Next. We will proceed with opening remarks  
17 by the Under Secretary for Food Safety and NACMPI  
18 Chair Dr. Emilio Esteban. Welcome, Dr. Esteban.

19 DR. ESTEBAN: Thank you, Katrina, and good  
20 morning committee members. Thank you very much for  
21 being here with us.

22 FSIS looks for the recommendations of this  
23 committee to inform our federal inspection activities.  
24 Our regulatory agency, FSIS is accountable to ensure  
25 that our processing inspection system protects public

1 health by preventing food illnesses caused by FSIS-  
2 regulated products.

3           To achieve this, we have to relay issues  
4 that can cause concern about and be involved in food  
5 safety hazards. Our deliberation in this committee  
6 helps us achieve those goals. When issues are  
7 identified, we put forward a charge or question to the  
8 committee who then provides recommendations for  
9 improvement.

10           Once feedback is provided back to the  
11 agency, we take all that into account. It is a very  
12 diverse committee with various knowledge in  
13 development, scientific, and public health. The  
14 agency takes all recommendations and will integrate it  
15 into our inspection system. This morning, we will  
16 present the details of the work done from the 2023  
17 committee.

18           And in fact, with last year's  
19 recommendations, we seek input from the committee on  
20 how the agency considers establishment size. This is  
21 very important because we use the establishment size  
22 to measure the impact on regulations and other  
23 applications. To, me, it is very important that we do  
24 get feedback on public regulations from the agency's  
25 commission. We will consider the feedback provided

1 and give updates on these categories.

2           The second topic we are looking for input on  
3 is the ways that we can improve technology with FSIS.  
4 Technology changes almost every day and, so, we need  
5 to keep our regulatory approach in line with those  
6 technology developments. We recognize that the  
7 industry has integrated technology in its processing  
8 and we want the agency to not stand in the way of  
9 others and help facilitate that but at the same time  
10 be comfortable within our own business.

11           So, to better understand the implications of  
12 technology, we are requesting feedback on whether  
13 regulations for policies are creating any obstacles or  
14 innovation into the adoption of more efficient  
15 technology. This could be very important and the  
16 nature of my work as the Under Secretary is to make  
17 sure that our approach to inspection is not obsolete.  
18 We want to help facilitate and develop these  
19 technologies. We are a data-obtaining agency and our  
20 technological tools must be efficient.

21           So, again, we really want to get your input  
22 on technology and how we get those out to the  
23 establishments to make sure that we apply those to  
24 future regulations.

25           Again, thank you very much for being here

1 today, especially you on the West Coast who have to  
2 get up early to be with us. I appreciate it.

3 And next, I would like to invite Ms.  
4 Angelica Marrero Sanchez, Deputy Director of  
5 Technology staff with the Office and Policy and  
6 Program Development and she will provide agency  
7 updates for the 2023 committee recommendations. Thank  
8 you very much, again. Angelica, the floor is yours.

9 MS. SANCHEZ: Thank you so much, Dr.  
10 Esteban. I think those eights are out now. Good  
11 morning, everyone. Good morning committee members,  
12 attendees, and colleagues. My name is Angelica  
13 Marrero Sanchez. I am an economist and the Deputy  
14 Director of the Policy Analysis staff in the Office of  
15 Policy and Programs Development.

16 I will be presenting today on our updates  
17 regarding last year's charge which I presented in  
18 front of the committee as well. And our charge was  
19 asking the committee for input on enhancing efforts to  
20 provide outreach and resources to promote equal access  
21 to inspection service for underserved communities.  
22 Next slide.

23 A brief refresher. Last year's charge was  
24 driven by the executive orders on equity, which  
25 directed agencies to pursue a comprehensive approach

1 to advancing equity for all. It was also driven by  
2 the Unity Equity Commission work and their report.  
3 Back then it was their preliminary report.

4 Now the final is available and the report  
5 includes recommendations on technical assistance and  
6 on ensuring equitable language and culturally  
7 competent access to USDA services, among other  
8 recommendations and they said the final report is  
9 available and I will post a link once I'm done  
10 speaking.

11 And another reason for us to present the  
12 charge was on FSIS action plans. With that action  
13 plan, we aim to improve outreach and engagements with  
14 small and very small establishments and reduce  
15 barriers to starting and operating a USDA-inspected  
16 facility. Next slide.

17 So, again, we're visiting the charge  
18 portion. We requested information from NACMPI on ways  
19 to enhance outreach and engagement efforts to promote  
20 equity for youth established in underserved  
21 communities all while strengthening the food supply  
22 chain and ensuring compliance with food safety  
23 regulations. Next slide.

24 And during the last year's meeting, the  
25 committee was divided into two subcommittees. One

1 that focused on outreach to prospective applicants and  
2 the other one focused on assistance to current  
3 establishments. We presented each subcommittee with a  
4 series of questions for members to consider and the  
5 topics included barriers faced by establishments,  
6 awareness of FSIS resources, data sources, successful  
7 outreach examples, as well as actions to assist and  
8 stimulate establishments. Next slide.

9           There NACMPI did making recommendations and  
10 all in all the committee presented 39 recommendations  
11 through the two subcommittee reports. Next slide.  
12 And the recommendations focused on guidance for  
13 industry, FSIS communications, FSIS training and  
14 operations, furnishing data, and flexibilities for  
15 small and very small establishments. FSIS evaluated  
16 all the recommendations and we identified actions that  
17 we would explore for implementation or we look at what  
18 we're currently doing and considered was already in  
19 progress. Next slide.

20           And now I will provide an update on what we  
21 are implementing or have implemented in response to  
22 the NACMPI recommendations. Next slide. All right.  
23 First off, on the topic of guidance for industry,  
24 NACMPI recommended that FSIS publish a concise guide  
25 for prospective outlook to determine whether they meet



1 inspection and the requirements for obtaining a grant  
2 of inspection. This is work in progress. We have  
3 developed some guidance for posting for websites this  
4 fall and we will include translated versions.

5 Another recommendation was that FSIS provide  
6 guidance on meeting inedible disposal requirements.  
7 This is also in progress, we have reviewed our  
8 available guidance and resources for small and very  
9 small establishments for meeting inedible disposal  
10 requirements and we will publish a knowledge article,  
11 also known as an askFSIS Q&A consolidating all of this  
12 information. It will be shared with establishments  
13 through our newsletters. Next slide.

14 The committee also recommended that FSIS  
15 provide guidance on product disposition when  
16 deviations occur and this is in progress. We are  
17 developing guidance for small and very small  
18 establishments on properly disposing of products when  
19 deviations occur, particularly focusing on cases like  
20 power outages and natural disasters.

21 And the last recommendation on this topic  
22 is, as I hinted earlier, this is ongoing work. We  
23 have already translated into Spanish, Vietnamese,  
24 Arabic, Mandarin, and French. Some only used  
25 resources. An example is the Guide Book for

1 Preparation of HACCP Plans. Another example is the  
2 Sanitation Standard Operating Procedure Model. We  
3 have also translated some recently-issued guidelines  
4 such as the guideline for retained water.

5           These are all available on our website and  
6 you can navigate to our guidelines page and select a  
7 specific guidance document or choose a language that  
8 you want to see what guidance is available in that  
9 language. There are filters that you can select from  
10 on the left side. And I will also share that link  
11 when I'm done speaking here. Next slide.

12           Another topic was FSIS communications and  
13 the committee recommended that we review our website  
14 to determine if improved navigation can assist  
15 producers and prospective applicants with obtaining  
16 important information. This is ongoing. This is in  
17 progress. We are evaluating the contents of our  
18 website. We are studying that to understand  
19 navigation and queues of our website and we will make  
20 any of these that we determine are necessary to  
21 improve accessibility.

22           The committee also recommended that FSIS  
23 establish a central repository of updated and  
24 validation resources that can serve as a searchable  
25 database for processors to find relevant technical

1 information. These have been previously adopted on  
2 our website. The webpage has a HACCP validation. It  
3 contains information regarding HACCP validation  
4 requirements and it contains research that can be  
5 searched by pathogen or product. It also contains the  
6 most up-to-date originators list.

7 And again, you can find the website, the  
8 specific webpage by navigating to inspection,  
9 compliance guidance, HACCP, and HACCP validation. And  
10 I will also publish a link once I'm done here. Next  
11 slide.

12 Also on commutations from the agency, the  
13 committee recommended that FSIS facilitate and expand  
14 the regional listening sessions, town halls, and  
15 summits to better integrate the small and very small  
16 industry with the FSIS mission and our message and to  
17 streamline communication. This is ongoing.

18 FSIS has been holding roundtables between  
19 our leadership and existing establishment owners and  
20 operators throughout the country. We have been able  
21 to do that in a hybrid format for these round tables  
22 to perfect accessibility so they have an option to  
23 attend in person and they're given a location or  
24 virtually. And we do this several times a year. We  
25 have been doing it for a couple of years and once a

1 year we try to do it on a national level.

2 We also hold monthly town halls with  
3 establishes and all establishments can attend and we  
4 provide information on our initiative and updates to  
5 all of those who attend. We also take questions and  
6 our leadership is available to respond and point  
7 people in the right direction during those.

8 Also, the committee also recommended that  
9 FSIS expand engagement accessibility to increase  
10 participation in the round tables and the  
11 establishment of town halls. This is ongoing. We  
12 have increased the outreach to potential roundtable  
13 participants. We also want to maintain a private  
14 setting that allows participants to share their  
15 questions and concerns comfortably and also  
16 confidentially with our leadership.

17 So, we try to strike that balance of  
18 encouraging people to attend but also keeping it at a  
19 level that people feel comfortable speaking to  
20 our leadership. That's very important for these  
21 roundtables. We promote all of our events, and  
22 webinars, and upcoming meetings through our  
23 newsletters, and specifically for roundtables we have  
24 partnered with historically black colleges and  
25 universities, as well as minority-serving institutions

1 to host the events. We also produce interpretation  
2 services upon request. Next slide.

3           On that, this is the last one on the topic  
4 of communications, NACMPI recommended that we create a  
5 quarterly newsletter to provide regulated facilities  
6 with relevant information, regulatory updates,  
7 webinars, and resources on a regular basis. This was  
8 implemented very close to the NACMPI meeting last  
9 year. Last July we started sharing a monthly  
10 newsletter for small and very small establishments and  
11 it is called the FSIS Update For Small Plants. It  
12 includes updates and information for all  
13 establishments that sign up and we include  
14 announcements and order roundtables there as well.

15           We have another newsletter, the Constituent  
16 Update, and we share important information and timely  
17 information with establishments and stakeholders. And  
18 I will include the link for those newsletters in case  
19 you haven't signed up yet. Next slide.

20           The committee had some recommendations in  
21 terms of FSIS training and operations. And one of the  
22 recommendations was that we evaluate and update the  
23 instructions that we issue for EIAO's. In particular,  
24 that was related to outreach to small and very small  
25 establishments. This is also in progress.

1           We conducted a review of current  
2 instructions and the resources we provide to EIAO's on  
3 the topic of outreach activities for small and very  
4 small establishments and we are in the process of  
5 updating the instructions. We will share with our  
6 personnel once available.

7           Also on the topic of emphasized personal  
8 training and operations, the committee recommended  
9 that we build capacity to further expand the askFSIS  
10 and Small Plants Help Desk. These have been  
11 previously adopted. We consolidated the Small Plant  
12 Help Desk and the askFSIS and we cross-trained staff  
13 to improve response time. Our technical experts  
14 respond to questions submitted through the platform  
15 and they provide clarification and technical expertise  
16 to the industry and also our own personnel. They do  
17 not make compliance determinations but they are  
18 available to help personnel who are making those  
19 determinations as needed. Next slide.

20           The committee had a recommendation in terms  
21 of data and it was that we conduct a survey in small  
22 and very small establishment managers and non-managers  
23 to seek input on our agency commutations and tools.  
24 This has been completed between March and April of  
25 2024, so, earlier this year.

1           We sent our survey to establishments and  
2 operators and about 5,850 received the survey. It was  
3 available in English, Spanish, French, Vietnamese,  
4 Arabic, and Mandarin. And we asked questions about  
5 commutation with FSIS, their preferred languages, as  
6 well as guidance needs among others. Through the  
7 survey, we found that most owners and operators  
8 receive information directly from our personnel.

9           So, through the IPP or -- mainly IPP or they  
10 receive information through the data platforms, like  
11 the list source or askFSIS. They mainly found that  
12 the answers they receive are understandable and helpful  
13 and they considered the timeliness to be at least  
14 reasonable for most of the contact times. Next slide.

15           And our last update is on flexibilities for  
16 small and very small establishments. NACMPI  
17 recommended last year that we evaluate updating the  
18 classifications of official establishments for  
19 official establishments and this is in progress. We  
20 conducted a careful review of our EU's of the  
21 categories and our currently -- will be, in a few  
22 minutes, seeking input from NACMPI on potential  
23 changes to these. Next slide.

24           And with that, I have reached the end of my  
25 presentation. I want to thank the committee for their

1 thoughtful input and I will take any questions that  
2 you may have for me now. We have a question in the  
3 chat. I'm going to read it out loud. Can you remind  
4 us if the slides are going to be available?

5 Katrina, can you confirm whether the slides  
6 are going to be available? I believe so because we  
7 are also recording the presentation.

8 MS. GREEN: The slides will be made  
9 available, yes. They will be made available to the  
10 committee members and then later once everything gets  
11 provided on the website, the slides will be available  
12 as well. As mentioned earlier, the meeting is being  
13 recorded. So, everything will be available on FSIS  
14 website.

15 MS. SANCHEZ: Any other questions? I think  
16 if you're able to unmute if you can and identify  
17 yourself. If not, you can use the chat as well, or  
18 raise your hand. Okay. I don't see anything. As I  
19 mentioned, I will post the links that I noted  
20 throughout the presentation.

21 I will post them to the chat and I think we  
22 can move on to the next slide and the next  
23 presentation. And I will turn it over to Sarah  
24 Milchman who will be presenting on evaluating HACCP  
25 size classifications. Thank you very much.



1 MS. MILCHMAN: Thank you, Angelica. Can  
2 everybody hear me this evening? I think so. So, I  
3 will just get started. Sarah Milchman and I'm an  
4 economist within the Policy Analysis staff in the  
5 Office of Policy and Program Development at FSIS. And  
6 today I will be presenting on evaluating updates to  
7 HACCP size classifications for FSIS official  
8 establishments. Next slide.

9 Okay. A little background before we get  
10 started. In June 2023, FSIS charged NACMPI with a  
11 question on how the agency can enhance its outreach  
12 and engagement from small and very small  
13 establishments.

14 NACMPI presented multiple recommendations,  
15 including that FSIS evaluate the entirety of its HACCP  
16 size classification system to better group similar  
17 establishments and size classification categories.  
18 NACMPI referred to USDA grant programs from suggesting  
19 FSIS updates to these definitions. The committee also  
20 recommended that FSIS seek stakeholder input on this  
21 topic. So, overall, today, this presentation is going  
22 to cover the ways the agency currently uses the HACCP  
23 size categories, as well as other size categories used  
24 by the agency. Next slide.

25 The HACCP size standards were developed in

1 the 1990's package and reduction HACCP Final Rule and  
2 they have remained the same since. The size  
3 definitions are mostly based on employee counts at the  
4 establishment level. Very small establishments have  
5 less than 10 employees or annual sales of less than  
6 2.5 million and make up about 47 percent of FSIS-  
7 inspected establishments.

8           Small establishments have between 10 and 499  
9 employees and make up about 45 percent of FSIS-  
10 inspected establishments. Large establishments have  
11 500 or more employees and make up about eight percent  
12 of FSIS-inspected establishments. Next slide.

13           At the time the HACCP size definitions were  
14 created in 1996, the 500 or less employee requirement  
15 for small establishments was similar to the Small  
16 Business Administration, or SBA, standards, which at  
17 the time considered any company with 500 or less  
18 employees as a small business. The difference being  
19 that HACCP of the employees at the establishment level  
20 while SBA counts employees at the firm or company  
21 level.

22           So, for example, let's consider a company.  
23 Each establishment is considered small under the HACCP  
24 size standards but the company itself is considered  
25 large under SBA since it counts the total employees

1 combined at all three establishments. SBA had  
2 established its 500-employee standard for small  
3 business in manufacturing in 1953, and the 500-  
4 employee count was considered the anchor-size standard  
5 for employee-based size standards for many years until  
6 SBA recently revised its standards.

7 SBA defines the size standards for each  
8 North American Industry Classification System, our  
9 NAICS category. NAICS is the standard used by federal  
10 statistical agencies and classified business  
11 establishments for the purposes of collecting,  
12 analyzing, and publishing statistical data.

13 So, as you can see from this table, the SBA  
14 STANDARDS FOR SMALL businesses in the NAICS categories  
15 that are most associated with the industries that FSIS  
16 regulates were all allowed up to 500 employees to be  
17 considered small in 1996.

18 Then, in 2019, and then 2022, the employee  
19 count for these industries were adjusted to 750 to  
20 1,250 employees. So, the difference between HACCP and  
21 SBA size standards have increased over time. And you  
22 can find more information about size standards in 13  
23 C.F.R. part 121 and also from the link at the bottom  
24 of this table. Next slide.

25 Okay. So, FSIS uses the HACCP size

1 categories for various functions. For example, we  
2 commonly the HACCP size categories to assess the  
3 impact that regulations have on small entities and  
4 Regulatory Flexibility Act analysis. But we've also  
5 considered other size metrics such as production  
6 volume when assessing the impact and new regulation  
7 has on small entities. SBA generally recommends  
8 agency use, the SBA size definitions when possible to  
9 assess the impact that new regulations have on small  
10 entities.

11 In addition, sometimes as with the HACCP  
12 implementation, we have used HACCP sizes to phase in  
13 regulatory requirements. That is we start enforcing  
14 new requirements at large establishments, then small,  
15 then very small. FSIS also uses the HACCP size  
16 categories to determine the number of samples to  
17 collect for the routine risk-based listeria, or RLM,  
18 on the same program. And HACCP categories are used to  
19 summarize sampling results for salmonella and raw  
20 chicken performing standards.

21 When submitting questions through askFSIS or  
22 the Small Plant Help Desk forum, there is an option of  
23 selecting the establishment size from the dropdown  
24 menu. The establishment size information from this  
25 question I used for internal reports and planning.

1 FSIS also used the HACCP size categories for various  
2 internal documents and/or data analysis. Next slide.

3 FSIS also uses many other size metrics that  
4 are found in the C.F.R., register notices and  
5 regulations. These size standards differ from the  
6 HACCP size categories to better account for each  
7 circumstance and often to give low-volume or small  
8 businesses more flexibility. Many of the size  
9 standards loosely follow the HACCP size by using the  
10 500-employee count threshold for small businesses but  
11 some, such as sampling and nutrient labeling, take  
12 volume into account.

13 We put together a list of some other  
14 categories commonly used by FSIS. So, for example,  
15 small and very small establishments who were eligible  
16 for reduction in overtime and holiday inspection fees.  
17 For this scenario, we define small and very small the  
18 same as we do the HACCP size categories, except that  
19 we apply them at the company level instead of the  
20 establishment level.

21 Small businesses are also exempt from  
22 nutrition labeling. So, for this scenario, small  
23 businesses are defined as a single multi-plant  
24 facility including retail store operations that employ  
25 500 or fewer and produces no more than 100,000 pounds

1 a year. Under the Cooperative Interstate Shipping  
2 programs or CIS, certain small and very small state-  
3 inspected establishments can be eligible to ship meat  
4 and poultry products in interstate commerce. And to  
5 be considered for CIS by state, the establishment must  
6 employ 25 or fewer employees. Next slide.

7 FSIS also sometimes allow small or very  
8 small establishments more time to comply with new  
9 regulations. So, for example, the 2024 proposed  
10 salmonella framework is proposing an implementation  
11 schedule that would allow medium, low, and very low  
12 volume establishments additional time to comply with  
13 volume categories defined by daily pounds of  
14 comminuted product produced, or annual pounds of  
15 chicken parts, or annual birds slaughtered.

16 Sampling programs at FSIS mostly use  
17 production volume to determine the frequency or the  
18 location sampling but the production volume thresholds  
19 for small, low volume differ depending on the product  
20 and sampling program. So, for example, establishments  
21 producing over 6,000 pounds a day of comminuted raw  
22 pork have up to two samples a month, while those with  
23 between 1,000 and 6,000 pounds have a random sampling  
24 frequency.

25 For modified process control requirements

1 FSIS uses the HACCP definition to define very small  
2 poultry establishments and annual head counts for very  
3 low-volume slime in poultry establishments. Next  
4 slide.

5 So, now we will move on to the NACMPI  
6 charge. FSIS requests input on the agency site  
7 categories for grouping regulated establishments and  
8 FSIS seeks feedback on categories considered the  
9 following.

10 Practicality. FSIS should be able to use  
11 readily available data to classify establishments from  
12 size categories. Flexibility. FSIS should be able to  
13 revise or update the size categories as necessary.  
14 Consistency. FSIS should apply the categories across  
15 various product types. And SBA requirements, FSIS  
16 needs to be able to meet SBA's requirements when  
17 developing the cost-benefit analysis for regulations.  
18 FSIS will consider input from the -- size acquires.  
19 Next slide.

20 Now I will go into the charge questions,  
21 with the first group of questions targeting developing  
22 categories. First question FSIS uses multiple size  
23 categories. For example, production volume for  
24 sampling, passive site, or firm-level employee count  
25 set by the SBA. Are there any concerns with

1 continuing with that approach?

2           The second question, what metric should FSIS  
3 use to define size categories for regulated  
4 establishments? For example, employee count,  
5 production volume, revenues for footage, and what are  
6 the limitations or advantages to the recommended  
7 metric?

8           Question three how should FSIS account for  
9 establishment ownership when developing size  
10 categories? Should size categories apply at the  
11 establishment or the firm level? And to what extent  
12 do small or very small establishments owned by large  
13 firms receive a suspense from their parent company or  
14 owner? Next slide.

15           The next group of questions target industry  
16 uses. Question four, what size standards are commonly  
17 used within the industry for dividing small and very  
18 small? And question five, are there other  
19 applications for the current FSIS sizes outside of  
20 FSIS, such as within the industry? Next slide.

21           Okay. The last two questions target  
22 external sources. Question is, how should FSIS obtain  
23 data to determine if the establishment is a small  
24 entity under SBA size definitions? What would be the  
25 impact of using the SBA definition for other agency



1 functions such as implementation of regulations? The  
2 max number would allow for small businesses regulated  
3 by an FSIS are listed below for reference.

4 And the last question. Are there sources of  
5 data besides PHIS that FSIS can use to better identify  
6 establishment size and ownership structures? Next  
7 slide.

8 Okay. Thank you all for listening. Please  
9 let me know if you have any questions for me. Okay.  
10 I'm not seeing anything right now. There's no  
11 questions I guess we can pass it on to Melissa Hammar.

12 MS. HAMMAR: So, my name is Melissa Hammar.  
13 I'm the Director of Regulations Development Staff in  
14 the Office and Policy and Program Development at FSIS.  
15 Today I'm requesting NACMPI's input on ways technology  
16 could enhance FSIS inspection activities. Next slide.

17 So, on October 30, 2023, the Biden  
18 Administration released Executive Order 14110 on Safe,  
19 Secure, and Trustworthy Development and Use of  
20 Artificial Intelligence. It established a government-  
21 wide effort to guide responsible artificial  
22 intelligence development and deployment through  
23 federal agency leadership, regulation of industry, and  
24 engagement with international partners. Among other  
25 things, the executive order directs agencies to move

1 towards adoption with safeguards in place. Next  
2 slide.

3           So, FSIS is interested in AI but the agency  
4 is also interested in other advancements in technology  
5 that can enhance FSIS's inspection activities. FSIS  
6 is dedicated to leading with science and data in every  
7 aspect of our work. As you know, our mission is to  
8 protect the nation's commercial supply of meat,  
9 poultry, and egg products. We're continuously looking  
10 to enhance our inspection services through innovative  
11 technologies to improve efficiencies and outcomes.

12           Our commitment to leading with science and  
13 technology ensures that FSIS remains at the forefront  
14 of food safety. By adopting innovative solutions, we  
15 aim to improve our inspection, enhance data accuracy,  
16 and provide greater value to the public and industry.

17           So, our focus areas today are using  
18 technology to improve verification, adopting  
19 technology to improve our data collection, analysis,  
20 and decision-making capabilities, explore technologies  
21 that make interactions at FSIS more user-friendly and  
22 efficient, integrating advanced technology to enable  
23 quicker and more effective responses to food safety  
24 emergencies, and identifying processes to create cost-  
25 saving efficiencies without compromising safety. Next

1 slide.

2           So, as I mentioned, we're looking for input  
3 on how FSIS can use innovative technologies to  
4 streamline our inspection activities, to improve FSIS  
5 verification, customer experience, and lower costs,  
6 and decrease service delivery times. We are  
7 especially interested in ideas to use technology to  
8 better protect public health and improve reaction  
9 times to public health emergencies.

10           So, our charge questions are how industries  
11 can successfully implement any cameras, imaging, or AI  
12 technology to identify DFACS, trends, potential  
13 hazards, or other regulatory concerns. And the  
14 examples we gave were issues during preop, during  
15 sorting procedures, and verifying label requirements.  
16 We also are interested in what suggestions does  
17 industry have for FSIS to leverage technology for  
18 domestic import and export inspection.

19           Is there any automatic technology that  
20 industry is currently using that they think FSIS  
21 should use to enhance our inspection procedures? What  
22 challenges or hurdles have there been with internet  
23 connectivity and hardware potentially blocking the  
24 industry from adopting advanced technology? Does FSIS  
25 have any regulations for policies that are creating

1 obstacles to industry innovation and adopting more  
2 efficient technology?

3           What changes do you suggest that would  
4 maintain a better level of food safety? What current  
5 inefficiencies or issues can be addressed by  
6 leveraging technology? For example, remote veterinary  
7 dispositions or remote export certificates, or digital  
8 pin cards. Next slide.

9           So, FSIS is also interested in your opinions  
10 on using technology to improve record keeping because  
11 better access to electronic records could help FSIS  
12 conduct more efficient record reviews and improve data  
13 analysis. Also, digital distribution tracking  
14 information could help FSIS respond faster to  
15 outbreaks and other public health emergencies.

16           So, we would like to know what would  
17 industry need in order to go paperless? What programs  
18 or records are not possible to be paperless at this  
19 time? How is industry using paperless or digital  
20 inventory tracking, such as blockchains, fire codes,  
21 QR codes, to monitor product distribution for trace  
22 back or trace forward? Are there any FSIS forms or  
23 record-keeping activities that industry finds to be  
24 repetitive or unnecessary? Next slide.

25           Does anyone have any questions over those

1 charge questions? Okay. So, thank you all. I guess  
2 I will turn it back to Katrina. Thank you.

3 MS. GREEN: Thank you, Melissa. We will now  
4 move to public comment. As a reminder, each person  
5 making a public comment today will be provided three  
6 minutes to make their comment. We will let you know  
7 when you have 30 seconds remaining so that you can  
8 start wrapping up your comment. We will then move to  
9 the next person that preregistered for public comment.

10 After all attendees that preregistered have  
11 completed their comments, time permitted, we will open  
12 the floor for public comment from members of the  
13 public that did not preregister. If you wish to  
14 comment, you can join the queue by using the raise  
15 hand feature.

16 As a reminder to everyone, please introduce  
17 yourself before commenting. We will now start the  
18 public comment period with Ashley Peterson [phonetic  
19 sp.]. You have three minutes once your microphone is  
20 unmuted and your camera enabled. Then you will have  
21 three minutes.

22 (Correcting technical issues.)

23 MS. GREEN: Dr. Peterson said that she would  
24 log off and log back on. So, while she's doing that  
25 we can move to the next person that preregistered to

1 allow Dr. Peterson an opportunity to get logged back  
2 on. So, the next person that signed up for public  
3 comment is Kentay Grant [phonetic sp.].

4 (Correcting technical issues.)

5 MS. GREEN: Okay. I see that Ahley Peterson  
6 is back.

7 DR. PETERSON: I'm back.

8 MS. GREEN: Okay. Great. So, you now have  
9 three minutes for public comment, and thank you for  
10 your patience while we worked through the technical  
11 issues.

12 DR. GRANT: Absolutely. And thank you,  
13 Aaron. I'm using that was user error, meaning my  
14 fault. So, I'm glad the login worked quickly.

15 So, I appreciate you all hosting this public  
16 meeting today. My name is Ashley Peterson and I am  
17 the Senior Vice President of Scientific and Regulatory  
18 Affairs at the National Chicken Council and we  
19 certainly appreciate to provide comments on the two  
20 important NACMPI charges.

21 First of all, we have been requesting that  
22 the agency review HACCP for the last couple of years.  
23 So, really appreciate the opportunity to speak on that  
24 today and appreciated the background information as  
25 well. And we do think that it is important moving

1 forward that we look at the volume of product that an  
2 establishment produces and not the number of people  
3 that are in that establishment mostly because of the  
4 advances that we have seen in automation.

5           Chicken processing is far less labor  
6 intensive than it was when the agency first defined  
7 very small, small, and large establishments. As also  
8 mentioned, the proposed salmonella framework outlines  
9 the establishment sizes. We do have some questions as  
10 to why high-volume establishments were greater than 70  
11 million pounds per year and then the range from  
12 medium-volume establishments between 1 million and 70  
13 million pounds per year. Of course, we will submit  
14 those in our written comments as well.

15           Further, we also appreciate the agency  
16 looking at AI and advancements in technology  
17 specifically regarding inspection. We know that there  
18 are challenges with having a number of personnel that  
19 are required to be in facilities for continuity of  
20 business. And, so, the opportunity -- and we can  
21 provide additional comments in writing as well but I  
22 think it is important that we look at AI, whether in  
23 virtually auditing and things like that, so we can  
24 improve the efficiency of not only our own processing  
25 establishments but our commutation with the agency as

1 well. So, with that, thank you, again, for the  
2 opportunity to provide some comments and we will have  
3 more in writing. Thank you.

4 MS. GREEN: Okay. Thank you, Dr. Peterson,  
5 for your comments. Next is Connor. You have three  
6 minutes once you have your video and audio enabled.  
7 (Correcting technical issues.)

8 MS. GREEN: There are no more persons that  
9 preregistered to make public comments so we will now  
10 open the floor for comments from attendees. If you  
11 would like to make a comment at this time, please  
12 raise your hand to enter the queue. Aaron, do we have  
13 anyone that has requested to make a comment?

14 MR. BECZKIEWICZ: I do not see any hands  
15 raised at this time.

16 MS. GREEN: Okay. Thank you. There is no  
17 one else requesting to make a comment.

18 So this brings us to the end of our plenary  
19 meeting agenda. Before we conclude and break for  
20 lunch, I would like to make sure that everyone is  
21 aware that the subcommittee meetings will begin at  
22 1:15 p.m. Eastern Standard Time and conclude at 4:00  
23 p.m. Eastern Standard Time.

24 The links for the subcommittee meetings are  
25 being placed in the chat. So, in order to join, you



1 will need to click on the links. The link for  
2 Subcommittee One, which is the establishment size  
3 definitions group and Subcommittee Two the  
4 technologies impact on inspection group. You can  
5 click on either one of those and be able to access the  
6 meeting.

7           We have completed the purpose of today's  
8 NACMPI plenary meeting and now stand adjourned. Thank  
9 you all and we will see you back at 1:15 p.m. Eastern  
10 Standard Time at one of the subcommittee meetings.  
11 Thank you very much.

12           (Meeting adjourned)

13

14

15

16

17

18

19

20

21

22

23

24

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

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

PLENARY SESSION

Remote

September 16, 2024

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.



Tom Bowman, Reporter

FREE STATE REPORTING, INC.