

UNITED STATES DEPARTMENT OF AGRICULTURE

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NATIONAL ADVISORY COMMITTEE ON

MEAT AND POULTRY INSPECTION

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SUBCOMMITTEE A

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OUTREACH TO PROSPECTIVE APPLICANTS  
FOR FSIS INSPECTION

+ + + + +

June 22, 2023

10:05 a.m.

Via Webex

CHAIR: DR. JAMES DILLON  
State of Texas

MODERATOR: MS. ANGELICA MARRERO SANCHEZ  
Designated Federal Officer  
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MS. SHARMI DAS

DR. GLENDA LEWIS (Alternate)

## I-N-D-E-X

<u>AGENDA ITEM</u>	<u>PAGE</u>
Opening and Introductions	<b>Error!</b>
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Discussion on Questions	9
1. What obstacles impede individuals in underserved communities from accessing FSIS' information resources?	
2. What barriers do individuals face when applying for FSIS inspection?	
3. What steps, outreach methods, partnerships or strategies should FSIS consider to raise awareness of its available resources in underserved communities?	
4. What datasets or other resources are available to assist FSIS in identifying underserved communities that would benefit from increased slaughter or processing capacity?	
5. What concrete actions can FSIS take, alone or in partnership with other stakeholder organizations, to most effectively stimulate increased slaughter or processing capacity in underserved communities?	
6. Are there any additional thoughts or recommendations you'd like to share?	

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

2 (10:05 a.m.)

3 MS. MARRERO SANCHEZ: Okay, we're good to  
4 go. Thank you so much. I think everyone is here in  
5 the room, so we can go ahead and get started.

6 I want to welcome you back to the  
7 subcommittee on outreach to prospective applicants.  
8 Thank you so much for your time and your input so far.  
9 We really value your recommendations and want to make  
10 sure that you're able to record and deliberate and  
11 have all the time available to you.

12 So, I will go over a few reminders and  
13 clarifications for today, and then I'll just turn it  
14 over to Dr. Dillon to continue with the discussion.

15 As you know by now, my name is Angelica  
16 Marrero and I am with the Office of Policy and Program  
17 Development in FSIS. And Katrina went over some of  
18 the reminders, so this might be a little repetitive,  
19 but I just want to make sure that the subcommittee is  
20 up to, and everyone is up to speed on where we are.

21 So, first off I want to remind you to  
22 deliberate verbally. And when you want to make a  
23 comment, please go on camera and state your name and  
24 affiliation. And you also don't need to raise your  
25 hand. We learned that yesterday, but just to make



1 sure that everyone's onboard with that, there is no  
2 need to use the raise hand option. Feel free to join  
3 the discussion, but state your name and affiliation  
4 when you do that. And if available, please turn your  
5 camera on. We're trying to mimic the in-person  
6 setting, so that helps with that, making technology  
7 more regular, I guess.

8           So members, only use the chat when it's  
9 necessary. If you want to make a comment, do it  
10 verbally. And if you need to make some sort of  
11 clarification or whatnot, you can use the chat then,  
12 but we're trying to save the chat for attendee  
13 comments.

14           The members don't have to read attendee  
15 comments, but you are free to deliberate and consider  
16 those as part of your report. So, keep an eye on the  
17 chat, and if there's anything that you want to react  
18 to, or include in the recommendations, you can do  
19 that. But if you're a member of the NACMPI Committee,  
20 please state your comments verbally.

21           And we talked on this briefly, and Katrina  
22 mentioned this earlier, but just to be sure again, you  
23 will need to provide a report by the end of today,  
24 that the full committee will consider and vote on.  
25 You already got started with your notes, so sorry for

1 the confusion yesterday, Dr. Dillon, but you are  
2 definitely on track when it comes to having your notes  
3 written down, for making them into a more concise set  
4 of recommendations for each of the questions.

5 Your recommendations will be presented at  
6 the 2:25 p.m. plenary session, and you will have 30  
7 minutes to go over those. So, at some point today,  
8 you'll have to make your notes more into full fledged  
9 recommendations to present to the Committee.

10 And my last recommendation here, or my last  
11 reminder here is that all the deliberations should  
12 occur during the meeting, so on the lunch break or any  
13 of that, if you think about anything, bring it back to  
14 the committee after we're back here.

15 And lastly, well my role here is to help you  
16 keep time, and as I did yesterday, I will remind you  
17 when you have a few minutes left. We will be  
18 splitting for lunch at 12 p.m. So, I will let you  
19 know a few minutes for that, and same in the  
20 afternoon. And I will help with any technical issues.  
21 Just send me a note, or click on the help button, and  
22 answer any questions you may have.

23 And with that, I think I've gone over all my  
24 reminders and clarifications, so if you have any  
25 questions, I will be happy to take those.

1 (No response.)

2 MS. MARRERO SANCHEZ: If not, I'll hand it  
3 over to Dr. Dillon. I guess I have to make you a  
4 presenter. And --

5 DR. DILLON: I think it's showing the share  
6 content option for me.

7 MS. MARRERO SANCHEZ: Oh, already?

8 DR. DILLON: So it may already be done. So,  
9 anyway --

10 MS. MARRERO SANCHEZ: Thank you.

11 DR. DILLON: I'm Dr. James Dillon, Director  
12 of Meat and Poultry Inspections for the State of  
13 Texas. I'd like to start off today just by thanking  
14 everybody for a wonderful discussion yesterday. It's  
15 not often that, in my position, I get to, you know,  
16 talk with such a, you know, diverse group of folks  
17 from a diverse group of backgrounds.

18 You know, I spend a lot of time talking to  
19 regulatory folks, I spend a lot of time talking to  
20 establishments, but it was really great to hear from  
21 everybody yesterday. I thought we had a great  
22 discussion on a variety of topics.

23 I did follow through on what I told you all  
24 I would do yesterday, and go ahead and get a draft,  
25 place to start, on paragraph form from the notes

1 yesterday. So, what I'd like to do, if everybody's  
2 all right with it, is go question by question, because  
3 we actually did get through pretty much all the  
4 questions yesterday, for five out of six of them.  
5 Number 6 is just kind of, do you have anything else,  
6 essentially.

7 But I figured I would go ahead and bring up  
8 the notes from yesterday, and then bring up the draft  
9 starting point for converting those to paragraph form.  
10 And we can have kind of discussion, question by  
11 question. So, if there's no objection to that, I'll  
12 go ahead and bring up the notes from the first part of  
13 the day yesterday. Is everybody seeing Q2 at the top  
14 of the page?

15 MS. GALLIMORE: Yes.

16 DR. DILLON: Okay, great. This is actually  
17 where I started yesterday on our computerized notes.  
18 I wrote the other ones, handwritten, and I did not go  
19 back and put them in this document. However, the two  
20 main topics that we talked about yesterday, I guess  
21 I'll go ahead and go to the paragraph form right here,  
22 is we talked about broadband access, so essentially  
23 the, you know, more or less a physical obstacle that  
24 plants have. And then we talked about a knowledge  
25 obstacle.

1           So, to start everybody off, the question,  
2 the first question we were asked to address is, what  
3 obstacles impede individuals in underserved  
4 communities from accessing FSIS' information  
5 resources?

6           So, the first obstacle we talked about was  
7 broadband access. So, how I started that off is, one  
8 type of obstacle that exists in more rural areas  
9 throughout the country is in actual access to  
10 information. This partially due to a lack of  
11 availability of broadband internet access in some  
12 areas. There is also a lack of available local, in-  
13 person consultative services to connect underserved  
14 communities to FSIS information resources.

15           Any comments, or suggestions, or anything on  
16 that particular point?

17           DR. WILLIAMS: James, your screenshare  
18 coming through on mine is not very clear. I don't  
19 know if I'm the only one, or if others are  
20 experiencing that. It's kind of garbled.

21           DR. ROGERS: It's clear over here, but I had  
22 to put it on my large monitor to be able to read.

23           DR. DILLON: I'll see if I can zoom in a  
24 bit. Maybe I can --

25           DR. ROGERS: Maybe the slider, at the

1 bottom, on your Word. Maybe make that --

2 DR. DILLON: Oh yeah, there we go. That  
3 would be the more expedient way to do it. Is that  
4 helpful?

5 DR. WILLIAMS: That is very helpful. Yes.

6 DR. DILLON: Okay, there we go. I'm glad  
7 we're all squared away then. Any comments on the --  
8 you know, we talked about broadband. I think we did  
9 also talk about that there just weren't that many, you  
10 know, folks around in some of these areas, for folks  
11 to go to, in their own community.

12 DR. ROGERS: Hey James, did we ever mention  
13 that maybe for potential candidates that want to do  
14 this, that the information is not in their native  
15 language. I think I mentioned about English being a  
16 second language or whatever, but did we ever discuss  
17 that yesterday, about that being a potential hurdle?  
18 Or does that come later?

19 DR. DILLON: Yeah. And I have that in some  
20 of the further options, however if we want to put that  
21 in here, we could certainly put in a short statement  
22 in there. I do think that FSIS has some mechanisms in  
23 there, but those may be hard for folks to know how to  
24 get to.

25 DR. ROGERS: Yeah, because I think you or

1 someone else mentioned that you can get a translator  
2 for Texas, the State of Texas information. And I did  
3 read, in some of the information here, that they are  
4 translating it in other languages, in addition to  
5 Spanish, at some point. But until that's done, or  
6 until you do have translations services, that might be  
7 a hurdle.

8 DR. DILLON: I'll just, I'll add a comment  
9 here, under that first one, under this first bullet,  
10 to address that.

11 MR. FILBRANDT: One comment that I've got --  
12 this is Scott Filbrandt here. One comment that I've  
13 got on, for the lack of broadband, USDA Rural  
14 Development classifies different areas that has  
15 internet. So say my house, I am classified as having  
16 access to internet.

17 High-speed internet is 1,500 feet down the  
18 road, and they will not run it to me, so that it --  
19 because of that, and then they're running fiber on the  
20 other end of the road, but they will not do it for me  
21 because I'm classified as having internet. So there's  
22 the classifications that are also hurting these  
23 people.

24 DR. DILLON: Yeah. I think that certainly  
25 there is establishments out there that are in

1 similar -- you know, we've got a couple of  
2 establishments that we inspect here in Texas, that  
3 it's a real struggle. Our folks are, you know,  
4 putting their MiFi device up in the window of the  
5 office, to try to get that one bar. And that's tough.  
6 So I think it's great that we are including that was  
7 an obstacle here.

8           We may want to consider putting something in  
9 one of our suggestions, down further, about some sort  
10 of action on that. So, I think that -- I don't know  
11 where exactly that would fit, but we may be able to  
12 fit something in there as an action item about that.

13           MR. FILBRANDT: Yeah. I just wanted to  
14 throw it out there so people understood.

15           DR. DILLON: Yeah. It's a real issue at  
16 some establishments. So, and it's an issue for FSIS  
17 as well, I think. I know it is for us. So anyway,  
18 the second type of obstacle that exists is a lack of  
19 knowledge about where to start looking for resources,  
20 or even knowledge about who needs inspection.

21           There's a tremendous amount of information  
22 available online, but that can be overwhelming to  
23 someone who is not familiar with the industry. Any  
24 comments on that as a starting point for defining that  
25 knowledge type barrier?



1 (No response.)

2 DR. DILLON: All right. Moving on to  
3 question 2, I'll bring up the notes here. And so we  
4 talked about capital, and then we've talked about the  
5 grant process quite a bit, and how it was too  
6 complicated and, you know, a lot of businesses were  
7 using grant writers, which is out of reach for many of  
8 the intended audience.

9 We also talked a lot about the business size  
10 classification being off, just saying small and very  
11 small, and that many of those businesses that may have  
12 gotten some of those grants are owned by one giant  
13 corporation, that probably employed grant writers, to  
14 say hey, go get me \$100 million. You know, the  
15 maximum size of those grants, I think, is \$25 million,  
16 in some cases.

17 And so, you know, that doesn't seem like it  
18 went to where it was supposed to go, in some cases.  
19 So, the second thing we brought up was knowledge base,  
20 about not knowing where to start, who needs inspection  
21 for what products under what conditions.

22 We talked about a lack of a federal, what I  
23 call a consumer guide, but I think I put better in  
24 our, in the next document, but talking about guidance  
25 for how to begin the process of going to inspection,

1 how to apply, who needs inspection, that that needs to  
2 be accessible in a variety of language, and it needs  
3 to contain contact information to obtain expert  
4 knowledge, such as trade organizations and academic  
5 institutions.

6 We talked also about the emerging barrier of  
7 EPA standards for wastewater as a concern. And I  
8 talked quite a bit about that in the other document  
9 that I'll show you all here in a minute. We talked  
10 about, you know, one barrier being that some plants  
11 don't want to give up their state inspection, and  
12 they're willing to, you know, accept a, essentially a  
13 ceiling on their business growth in order to make that  
14 decision.

15 DR. ROGERS: Could I ask a question real  
16 quick, James?

17 DR. DILLON: Sure.

18 DR. ROGERS: So for that one, is that  
19 pointed more toward existing plants, and not as much  
20 as to start a plant? I mean, do you think that if  
21 someone wants to get into this business as a small or  
22 very small plant, that they would target going state  
23 inspection first and then federal, or target federal  
24 inspection? Because that seems like what FSIS is  
25 trying to say, how do we get them under our system?

1 DR. DILLON: Right. And so, we see both  
2 things.

3 DR. ROGERS: Okay.

4 DR. DILLON: Technically, we see businesses  
5 start and go under federal inspection. I think Scott  
6 was talking about his experience with that yesterday.  
7 We definitely have a lot of plants here in Texas,  
8 that -- and I think other state programs would say the  
9 same, that start their business maybe even as a custom  
10 exempt operation, and then they get state inspection.

11 And then, at a certain point, they're faced  
12 with the decision of, am I forced to go federal in  
13 order to expand my business?

14 DR. ROGERS: Right.

15 DR. DILLON: Or do I stay within my state,  
16 and just accept that I, you know, that I can't do that  
17 in order to keep my state inspection?

18 DR. ROGERS: Okay.

19 DR. DILLON: I think the reason it fits here  
20 is because it is a barrier to plants getting federal  
21 inspection. It's their own desire to stay under state  
22 inspection. I was thinking a lot about the reason for  
23 that last night.

24 DR. ROGERS: The pros and cons, or  
25 incentives, or why would I go on and do this? Why

1 would I want a federal inspection?

2 DR. DILLON: Well, I think that --

3 DR. ROGERS: How we go to ship inter --  
4 between states, right?

5 DR. DILLON: Well, yeah. They -- right now,  
6 today, they're not able to ship interstate under an at  
7 least equal-to program. There is a program called the  
8 CIS program, however basically that forces a state  
9 program to conduct what they call same-as  
10 inspection --

11 DR. ROGERS: Right.

12 DR. DILLON: -- where I really have to do  
13 everything exactly the same way FSIS would do it. So  
14 there's really not a point.

15 DR. ROGERS: Okay.

16 DR. DILLON: All I'm doing is spending Texas  
17 taxpayer money to do the same thing. And so yeah, I  
18 was thinking about the reason why folks would want to  
19 stay under state inspection. I think a lot about  
20 this, but -- because there's not a significant  
21 difference in actual requirements. There's no  
22 difference in food safety requirement.

23 I think it's, for lack of a better way to  
24 put it, there's less lawyer between us and the plant.  
25 And there's, I think, more personalized service. I

1 mean, I talked to a guy last week that is a, you know,  
2 sheep and goat rancher in Texas, you know, about an  
3 issue that he had. And so I think we're just more  
4 accessible, and so it's easier for us to do the  
5 outreach type activities that FSIS is trying to get  
6 at, I think, with a lot of the questions of  
7 subcommittee, but --

8 DR. ROGERS: Okay.

9 DR. DILLON: But I think that's -- the  
10 reason why it fits here, to sum up, is that their  
11 desire to keep state inspection is a barrier to them  
12 going under federal inspection.

13 DR. ROGERS: Okay. You have a hand up.  
14 Ali.

15 DR. DILLON: Let's see, whoever's hand up,  
16 putting his up, please go ahead.

17 MR. MOHSENI-MATLAGH: Dr. Dillon, this is  
18 Ali Mohseni with American Foods. I was thinking while  
19 we are at the EPA issue, is there like DNR departments  
20 of every state and locality? Especially where the  
21 wastewater, some people would like to let it go onto  
22 the surface water, rivers and such.

23 Probably, wouldn't that be, apply also to  
24 mention something around where the EPA standard?

25 DR. DILLON: Quite likely, yeah. We can

1 look at that in -- I'll switch over to the other  
2 document here in just a moment. And we can kind of  
3 delve deeper, maybe, in that format, if that's all  
4 right with everybody else, on that part of a answer.

5           The last thing that we talked about, that I  
6 have in the notes here, is just the availability of  
7 consultants, to help establishments meet requirements.  
8 And then we talked about a possible EIAO involvement  
9 in that consultant role.

10           So, I'll switch over to the other paper  
11 here. So, we can go ahead and skip down to the  
12 wastewater issue, since that was brought up. I put it  
13 third, since that was just where it was in the notes,  
14 but it says, a third barrier inhibiting many -- excuse  
15 me. I put it fourth, sorry.

16           An additional barrier to both new and  
17 existing establishments that appears to be emerging  
18 involves the regulatory burden environmental control  
19 agencies are placing on meat and poultry production  
20 establishments regarding wastewater handling  
21 requirements.

22           These regulations can involve large expenses  
23 for small business to hold, test and remove wastewater  
24 from their facilities far in excess of the current  
25 regulatory burden.

1           Do we have some additional things we should  
2 put in here? I looked into this a little bit last  
3 night, and I think one of the major differences is  
4 with regards to, I guess, you know, drainage areas. I  
5 would suppose that in areas where they're saying,  
6 where the EPA or whoever it is, is saying that there's  
7 drainage into a body of water or into an catchment  
8 area or something like that.

9           I think that they're significantly more  
10 stringent areas. You know, in some cases I think  
11 that -- here in Texas, there are a lot of  
12 establishments that, you know, they have a lagoon type  
13 situation, and they can then, you know, pump that  
14 water out onto a field behind the establishment, and  
15 it's no big deal.

16           And I'm guessing that maybe there is some  
17 connection there to whether it's a drainage into a  
18 water body or like a catchment area.

19           Scott, does that line up with what you're  
20 seeing?

21           MR. FILBRANDT: Right now, the EPA is --  
22 this is just all exploratory. But our committee is  
23 trying to block some of it. The EPA has been sued  
24 by -- there's a court case going on right now, I  
25 believe, with a bunch of environmental groups.

1 They're suing them, so that's why they're coming back  
2 to look at this.

3           They're basically wanting our wastewater  
4 come out that I can take a cup, glass out of it and  
5 drink it, is how they're wanting the wastewater to  
6 come out. In Michigan, that's definitely the way it  
7 is. They're not wanting -- basically, clean water.  
8 It's -- I think the regulation was due to -- it was  
9 all -- everything going on. I think it was '26 is  
10 when all this is, they're hoping to make this take  
11 effect.

12           But it's not necessarily just for close,  
13 you know, nearby watersheds or whatever. It's any  
14 kind of wastewater going on to land applications and  
15 so on. It's going to be a very huge thing for a lot  
16 of meat plants.

17           DR. DILLON: So, maybe if we edit this a  
18 little bit, and instead of saying, are placing, we'll  
19 maybe say, may place, and then talk about, down here,  
20 maybe like, though these regulations are -- maybe  
21 these regulatory efforts are currently in an  
22 exploratory phase, the proposed changes may -- or  
23 maybe just the proposed changes will or would involve  
24 large expenses for small businesses, to pull, test and  
25 remove wastewater from their facilities far in excess



1 of the current regulatory burden.

2 This could have a disastrous impact on small  
3 and very small meat and poultry processors.

4 MR. FILBRANDT: Yes, yes. I think that's  
5 better wording. That makes it look a little bit  
6 better.

7 DR. ROGERS: Yeah, agree.

8 DR. DILLON: All right. All right, I'll go  
9 back up to the top here, on this question, and we can  
10 kind of work through them. So, the question is, what  
11 barriers do individuals face when applying for FSIS  
12 inspection?

13 First thing I've got here is, the first  
14 fundamental barrier numerous individuals face when  
15 considering an application for inspection is a lack of  
16 access to capital. USDA attempted to address this  
17 barrier through grant programs, however, these grant  
18 programs all too often failed to reach underserved  
19 populations.

20 The grant process was too complicated for  
21 many producers to successfully navigate, in some cases  
22 even being complicated enough to require businesses to  
23 obtain the services of a grant writer. This put many  
24 prospective businesses from underserved populations at  
25 a significant disadvantage in obtaining a grant.

1           In addition, by targeting businesses  
2 classified as small or very small, according to  
3 existing size classifications utilizing employee  
4 numbers, these grants all -- too is spelled wrong, all  
5 too often ended up being seized by larger  
6 establishments.

7           This includes business that are individually  
8 classified as small, but are actually owned by much  
9 larger corporations possessing greater resources and  
10 expertise to grant them through the grant application  
11 process.

12           MS. GALLIMORE: I do want to jump in real  
13 quick. I'm not saying this didn't happen at all, but  
14 there were protections in place to keep that last  
15 thing from happening. So though they were based off  
16 of the original classifications of establishments as  
17 being small and very small, there were stipulations  
18 for establishments that were owned by larger  
19 companies.

20           I don't remember the exact details, but  
21 there were protections in there for that. Again, it  
22 may not have prevented everything, but that was  
23 something the Department considered.

24           DR. DILLON: Okay. I think we had some  
25 examples of that yesterday, but maybe if we put maybe

1 the word in here that this includes some businesses,  
2 or --

3 Scott, did you have an example of that  
4 yesterday?

5 MR. FILBRANDT: Here in Michigan, I know  
6 Michigan Turkey got a very large grant to expand their  
7 building. It was millions. I'd have to go through my  
8 email to find how much they got, but it was a  
9 substantial amount for an expansion.

10 DR. DILLON: Casey, do you have a suggestion  
11 on how we might edit that, to address that concern?  
12 Or maybe just something in there to recognize that  
13 USDA may have made some effort to do that, that may  
14 not have been entirely successful?

15 MS. GALLIMORE: All right, my computer was  
16 not wanting to let me in, pretty much. I mean, I  
17 think the point of the, is 500 employees small in this  
18 context, is still valid. And again, that also depends  
19 on what you're doing. Like, 500 employees goes much  
20 farther in a processing plant that it does at a  
21 slaughter plant.

22 So I think those are still valid things to  
23 comment on. But I think, on the last point, I would  
24 just say, this may have included businesses that are  
25 individually classified as small. And I think that

1 again, the Department had, you know, some rules around  
2 that. But whether or not that --

3 DR. DILLON: Okay. Any objections to that  
4 edit? So, I've got the last line now as, this may  
5 have included businesses that are individually  
6 classified as small but are actually owned by much  
7 larger corporations possessing greater resources and  
8 expertise to guide them through the grant application  
9 process.

10 MR. FILBRANDT: You know, I think, if  
11 anything, that that kind of creates an awareness.  
12 Maybe they can look at their wording, and maybe just  
13 realign things to make sure that it's clear.

14 DR. WILLIAMS: It'd be appropriate to insert  
15 the word, much larger umbrella corporations.

16 DR. DILLON: Yeah.

17 DR. WILLIAMS: Yeah. Because there's some  
18 that, you know, are -- have their own individual grant  
19 numbers and so forth, but actually by an umbrella  
20 corporation that's out of sight, out of mind.

21 DR. DILLON: Now do you think we should put  
22 something in there to go into a little bit more detail  
23 about that, you know, maybe a business that has 500  
24 employees may not have been the intended target, or  
25 would that be maybe something to include later down

1 the page, in the solutions proposals?

2 MS. GALLIMORE: Even just like wording it as  
3 an -- I think we've got this somewhere, but even just  
4 wording it with, you know, utilizing the existing  
5 definitions of small or, and very small may not be as  
6 applicable here.

7 DR. DILLON: Okay. So, I think we sort of  
8 put that right here, but maybe we should reword that a  
9 little. So maybe, in addition, USDA utilized  
10 establishment size classification, or maybe based on  
11 employee numbers for the application process? This --  
12 I'm kind of trying to think of a way to say that a  
13 business with 500 employees is very different from a  
14 business with 5 employees, you know.

15 DR. WILLIAMS: Did we not mention in the  
16 proposed actions to suggest that USDA relook at the  
17 size classifications? I think that was further down.

18 DR. DILLON: Yeah, that would be further  
19 down. You know, do you think we should leave it was,  
20 and then -- a I had it previously and then address  
21 that farther down?

22 DR. WILLIAMS: I do, kind of.

23 DR. DILLON: Okay. I hit the old undo  
24 button here a bunch of times. There we go. All  
25 right, so I'll read through this one more time, and we

1 can see if we're happy with it. The first fundamental  
2 barrier numerous individuals face when considering an  
3 application for inspection is a lack of access to  
4 capital. USDA attempted to address this barrier  
5 through grant programs, however these grant programs  
6 all too often fail to reach underserved populations.

7 The grant process was far too complicated  
8 for many producers to successfully navigate, in some  
9 cases even being complicated enough to require  
10 businesses to obtain the service of a grant writer.  
11 This put many prospective businesses from underserved  
12 populations at a significant disadvantage in obtaining  
13 a grant.

14 In addition, by targeting businesses  
15 classified as small or very small according to  
16 existing size classifications utilizing employee  
17 numbers -- or maybe I should say based on employee  
18 numbers.

19 DR. WILLIAMS: Right.

20 DR. DILLON: These grants all too often  
21 ended up being seized by larger establishments. This  
22 may have included businesses that are individual  
23 classified as small, but are actually owned by much  
24 larger umbrella corporations possessing greater  
25 resources and expertise to guide them through the

1 grant application process. All right.

2           Moving on to the second one, the second  
3 fundamental barrier individuals face when applying for  
4 inspection is a lack of technical knowledge regarding  
5 what it takes to build and run a successful  
6 establishment. Many prospective businesses may not  
7 even know that they need inspection, let alone how to  
8 begin the process of obtaining inspection.

9           Currently, no clear, concise guidance  
10 document is published by FSIS that points prospective  
11 applicants to resources for determining whether or not  
12 they need inspection, how to apply for inspection, how  
13 inspection works, or how to begin the process of  
14 designing a production facility that complies with  
15 regulatory requirements.

16           Such a document should also include how to  
17 access outreach services to assist them in the process  
18 of meeting regulatory requirements and attaining a  
19 grant of inspection. This document should also be  
20 available in multiple languages sufficient to reach  
21 underserved populations.

22           More detail about the document and what it  
23 should look like is in a later entry as well. But I  
24 wrote it this way just to introduce it as a barrier,  
25 that there is no document. Any comments on this one?

1 (No response.)

2 DR. DILLON: Okay. A third barrier  
3 inhibiting many establishments in underserved  
4 communities from applying for FSIS inspection is their  
5 own desire to maintain state inspection, as opposed to  
6 FSIS inspection. Many establishments make the choice  
7 to obtain or maintain state inspection despite the  
8 business limitations imposed by the FSIS prohibition  
9 on at least equal-to state-inspected productions  
10 entering interstate commerce.

11 Participation in interstate commerce would  
12 have an undeniably positive impact on these businesses  
13 and their communities with no negative impact on food  
14 safety, as evidenced by annual audits of at least  
15 equal-to state meat and poultry inspection programs by  
16 FSIS.

17 Given the limitations faced by state-  
18 inspected establishments, coupled with the persistent  
19 choices that many establishments make to obtain and  
20 maintain state inspection, it stands to reason that at  
21 least equal-to state meat and poultry inspection  
22 programs are in some manner preferable to many  
23 establishments in underserved communities. This  
24 preference is therefore a barrier to those  
25 establishments applying for FSIS inspection.



1 DR. DILLON: Okay. The last one here, we  
2 already went through this one, but I'll read it again,  
3 just for consistency sake here. Additional barrier to  
4 both new and existing establishments that appears to  
5 be emerging involves a regulatory burden environmental  
6 control agencies may place on meat and poultry  
7 production establishments regarding wastewater  
8 handling requirements.

9 While these regulatory efforts are currently  
10 in an exploratory phase, the proposed changes would  
11 involve large expenses for small businesses to hold,  
12 test and remove wastewater from their facilities, far  
13 in excess of the current regulatory burden. This  
14 could have a disastrous impact on small and very small  
15 meat and poultry processors.

16 DR. WILLIAMS: Hey James, do you think that  
17 something like disproportional impact, or something to  
18 kind of emphasize it's going to hit the small and very  
19 small much harder than the larger producer?

20 DR. DILLON: Yeah.

21 DR. WILLIAMS: Would that fit in here  
22 somewhere?

23 DR. DILLON: Yeah, for sure.

24 DR. WILLIAMS: I don't know exactly what  
25 word to use, but --

1 DR. DILLON: Maybe we could say, this could  
2 have a disproportionate and potentially disastrous --

3 DR. WILLIAMS: Yes, I like that.

4 DR. DILLON: -- impact on very small, small  
5 and very small meat and poultry processors?

6 DR. WILLIAMS: Yeah, yeah.

7 DR. KUBER: One of the things we also, I  
8 brought up yesterday was the solid waste issue. And  
9 that is when plants are going up to, they choose to go  
10 up to federal inspection, it's for expansion, and I  
11 think that's part of this whole process we're running  
12 into is that, you know, we need to have expansion so  
13 people don't have to book two years out.

14 But part of the burden of that expansion is,  
15 what do you do with the solid waste? So, we've got  
16 the liquid waste here, you know, but solid waste  
17 becomes a barrier too, for small facilities, because  
18 they don't have the infrastructure nor the volume, you  
19 know, to ship to pet food industry, to ship pelts  
20 overseas to -- you know, they end up -- a lot of that  
21 stuff goes into the waste management system.

22 DR. DILLON: So you're talking about a, in a  
23 rendering service?

24 DR. KUBER: Right. There's just no, there's  
25 no access to rendering opportunities, and so then it

1 just goes to the landfill. Landfills are putting  
2 limits on some of these small facilities. So, you  
3 know, if you're thinking about going to the expense of  
4 going to USDA for expansion, but then, what do you do  
5 with that waste, because you're probably not going to  
6 jump up far enough to actually have alternative and,  
7 you know, you're limited in terms of your disposal.

8           So, I mean, there's a lot of talk about, you  
9 know, well did we talk about compost. But again, is  
10 that a central compost facility in a state or, you  
11 know, how does that work, or how does that look? And  
12 we're having discussions like that here in Washington,  
13 just to figure out how to help out some of these  
14 processors because, you know, they can't haul any more  
15 to the landfill than what they're already hauling.  
16 So, that's going to be a limitation.

17           DR. DILLON: Well I think one thing that may  
18 be compounding some of that is, you know, the price of  
19 hides has, you know, dropped precipitously over time.  
20 And, you know, I know establishments used to get paid  
21 for hides. They used to -- you know, at least here in  
22 Texas, they used to, you know, salt those hides, and  
23 lay them out and, you know, get paid for those. And  
24 now they're essentially just going to render.

25           DR. KUBER: Right, right.

1 (Simultaneous speaking.)

2 DR. KUBER: -- landfill. I mean --

3 DR. DILLON: Yeah.

4 DR. KUBER: If they can't get to rendering.  
5 So, because a lot of those rendering facilities are  
6 owned by the larger corporations, because it's all  
7 part of the, you know, it's all part of their  
8 infrastructure. But with the small facilities, they  
9 don't have that infrastructure to be able to do that.  
10 So --

11 DR. DILLON: Okay. So, should we -- do you  
12 think we should create another bullet here, to talk  
13 about, you know, the --

14 DR. KUBER: I'm just thinking like, you  
15 know, I mean, is there -- because -- so, if you end up  
16 taking that to, you know, a landfill situation,  
17 obviously that becomes an environmental issue down the  
18 road. If it ends up going to -- you know, if you're  
19 doing waste management in terms of composting,  
20 obviously there's going to be some restrictions and  
21 regulations there too.

22 And then, you know, what's the end game for  
23 that? So I'm wondering if it should be a separate  
24 bullet. So we've got the liquid waste question.  
25 Maybe there's -- you know, maybe it's just an

1 awareness type thing, to start that process, or  
2 continue that process, that -- I mean, waste  
3 management's a huge issue.

4 At the Northwest Meat Processor's  
5 Association meeting, not this past year but the year  
6 before, there was like a two-hour discussion that was  
7 only supposed to be a 45-minute talk. And it was, you  
8 know, basically everybody talking about, you know, how  
9 are we going to get rid of the excess waste that --  
10 because there were some landfills that stopped taking  
11 it.

12 MS. GALLIMORE: It also --

13 DR. WILLIAMS: That's a major issue in the  
14 Southeast, or at least some areas, basically the rural  
15 areas. And it's a major cost for some, that have been  
16 able to get access. And some have been not able to  
17 get rid of it at all. So --

18 DR. KUBER: Yeah, well it used to be a  
19 little bit of money in the pocket. Now it's an  
20 expense. And then that conversation led into the  
21 employees that, you know, trying to -- you know,  
22 employee retention. And, you know, then we ended up  
23 having a conversation about well, you know, most of  
24 these plants can't afford to -- because they don't  
25 have the larger infrastructure, you know, to pay for

1 retirement. And I mean, it just kind of snowballed  
2 into a two-hour discussion. So we finally had to cut  
3 it off. There were a lot of issues that came up that  
4 day.

5 MS. GALLIMORE: Organizationally, I am  
6 seeing these last two bullets in my head as kind of  
7 issues that are very real, that are -- that don't  
8 directly fall under FSIS' mission area. So I almost  
9 wonder if we should have these as like, sub bullet of,  
10 you know, there are other things that are outside of  
11 FSIS' kind like wheelhouse, that are impacting.  
12 Because honestly, we could probably come up with a lot  
13 more.

14 These are really great examples of some of  
15 these other, you know, bigger barriers that FSIS may  
16 be able to help, you know, consult with another agency  
17 on, but there's not a lot, directly, they're going to  
18 be able to do, as all for some of these things.

19 DR. KUBER: Yeah, and I agree, Casey. I  
20 mean, I just -- you know, I think, if trying to get  
21 people in the -- you know, if their thought of going  
22 to USDA is expansion, then these two become barriers  
23 for that process. But they're also a barrier, whether  
24 you're custom, whether you're state inspected. I  
25 mean, you got to get rid of waste, and then that

1 becomes a federal and state government, you know,  
2 issue to try and help, you know, and help these  
3 people.

4 DR. WILLIAMS: But even when you apply for a  
5 grant of inspection, you have to have a means of  
6 disposal of liquid and solid waste when USDA comes to  
7 give your final approval, regardless. So, my point  
8 is, it is a barrier.

9 DR. DILLON: We could introduce them as a  
10 barrier here, and then talk a little bit more about  
11 them in item 6. That's the one we didn't really get  
12 to in our discussion yesterday, but it's kind of a  
13 catch-all, although -- all the way down the page here.  
14 So, question 6 is, are there any other -- or  
15 additional thoughts or recommendations you'd like to  
16 share.

17 You know, that seems like a place where we  
18 can maybe, you know, suggest to FSIS, you know, to  
19 look into a couple of these issues or, you know, weigh  
20 in on the regulatory burden, you know, regarding  
21 wastewater and, you know, maybe look at the issue of  
22 inedibles disposal as a barrier.

23 You think we should leave the introduction  
24 to the barrier in this section, and then talk about  
25 intervention in 6, or do you think we should move all

1 of it to 6?

2 DR. WILLIAMS: I think leave it and further  
3 discuss, but that's just my thought.

4 DR. DILLON: I agree. Any objection to that  
5 course of action? All right. Well that wraps up  
6 question 2, so move on to question 3 here. This is  
7 really getting into the meat of a lot of what we  
8 talked about yesterday. What steps, outreach methods,  
9 partnerships or strategies should FSIS consider to  
10 raise awareness of its available resources in  
11 underserved communities?

12 So, the first method FSIS should utilize to  
13 raise awareness of available resources in underserved  
14 communities is to publish a clear, concise guidance  
15 document that points prospective applicants to  
16 resources for determining whether or not they need  
17 inspection, how to apply for inspection, how  
18 inspection works, and how to begin the process of  
19 designing a production facility that complies with  
20 regulatory requirements.

21 In particular, the document should provide  
22 guidance on facility construction, product flow,  
23 written food safety systems, such as SSOP, HACCP,  
24 recall plans, laboratory testing and prerequisite  
25 programs, and potentially guidance for engaging with



1 other regulatory entities that may have jurisdiction  
2 impacting meat and poultry businesses. Such a  
3 document should also include how to access outreach  
4 services to assist, maybe prospective establishments,  
5 or prospective applicants, in the process of meeting  
6 regulatory requirements and obtaining a grant of  
7 inspection.

8           These outreach services may include but are  
9 not necessarily limited to trade organizations, state  
10 departments of agriculture, extension offices,  
11 academic institutions, local health departments, state  
12 meat and poultry inspection programs, local community  
13 development offices, and FSIS websites, district  
14 office points of contact, state and federal compliance  
15 personnel and EIAO personnel.

16           This document should also be available in  
17 multiple languages sufficient to reach underserved  
18 populations. So we got a lot of stuff, under the  
19 compliance -- the kind of introduction document there.  
20 I tried to grasp all of that. I can bring up the  
21 notes, if we want to see those. I referenced it in  
22 the notes as a consumer guide document just because  
23 that's what we call ours, but we wouldn't necessarily  
24 have to call it that.

25           I think I captured all of the types of

1 agencies that they should work with on this, or put  
2 contact for. Does anybody have anything additional to  
3 put on that bullet? I'll try to make it a little  
4 smaller temporarily here, so you can see the whole --  
5 actually I guess you can see it. I think you can see  
6 the whole thing.

7 DR. WILLIAMS: You know, years ago, you had  
8 to submit plans or layouts, diagrams of a facility for  
9 USDA approval before you could actually even, you  
10 know, begin the process, or supposed to. I'm not  
11 suggesting that we go back to that, but I mean, I  
12 guess a lot to be said for some of the preliminary  
13 avoidance of some pitfalls, for some people.

14 DR. DILLON: Yeah. That's an issue that  
15 we've talked about in our program a lot. We see  
16 things in facility construction that, you know, we  
17 walk in and we may say well, it's not noncompliant,  
18 but I'm sure not understanding you built it that way.  
19 And I think when we switched over from, you know, in  
20 the early 2000s type of -- you know, time frame, to a  
21 HACCP perspective on food safety and regulatory food  
22 safety, a lot of the whole, submit your plans and I'll  
23 approve them, went away.

24 I think that's about the time it happened in  
25 our program. And that's a thing we've talked about

1 is, you know, starting to provide that guidance, not  
2 necessarily approval. You know, because if it meets  
3 regulatory requirements, it meets regulatory  
4 requirements. And if you don't want to shell out for  
5 a higher ceiling and you want to quarter everything on  
6 the kill floor, that's not noncompliant.

7 I don't know that it's a great business  
8 decision, and I'd like to have the opportunity to tell  
9 folks, hey, you may be limiting yourself here, for  
10 their benefit, but it's not noncompliant. And we've  
11 talked a lot about that in our program. Do you think  
12 we ought to put more about that than just mentioning  
13 guidance on facility construction? Or is there a way  
14 to do that?

15 MR. MOHSENI-MATLAGH: Building and ground  
16 rules is still, I guess, a part of the requirements  
17 from FSIS regarding, as you just described them. So,  
18 I guess, that is -- if there is -- if they need to be  
19 in compliance, either we got to make sure that's  
20 updated, revised, and more user-friendly. Probably it  
21 could be used, but I guess years ago when I looked at  
22 it, it was very comprehensive, and really give enough  
23 information to whoever wants to build a new building  
24 or add, or do some renovation in their plants.

25 They have to be in compliance. And it was

1 simple enough to understand it, actually. So maybe  
2 that's referenced with help, provided that we could  
3 also ask FSIS to just update that.

4 DR. DILLON: You think we should put that in  
5 our suggestions on number 6, that they should  
6 consider, you know, producing a, you know, facility  
7 construction guidance document, or updating a facility  
8 construction document, that includes not only  
9 regulatory compliance, but --

10 MR. MOHSENI-MATLAGH: Yeah.

11 DR. DILLON: -- design aspects, to help new  
12 establishments be successful?

13 MR. MOHSENI-MATLAGH: Yes.

14 DR. WILLIAMS: I like that wording. At  
15 least suggested efficient guidance for efficient  
16 business operations, for this type.

17 DR. DILLON: Okay. I'm going to go down  
18 here in the notes real quick, and under question 6,  
19 and put, facility construction guidance. And then we  
20 can come up with some wording at the end.

21 DR. KUBER: James?

22 DR. DILLON: Does that work for everybody?  
23 Yeah.

24 DR. KUBER: Maybe with that, we make sure  
25 that we keep them aware of identifying things that may

1 alter in a small facility versus large facility? I  
2 mean, I'd hate to have them go through and do  
3 something that really is geared towards the larger  
4 packing industry. You know, I believe in all sectors  
5 of the industry, but if we're trying to talk about  
6 improving some of the infrastructure where there's  
7 deficits, you know, we may have to have some things  
8 that appeal to smaller facilities and smaller  
9 operations too. I mean --

10 DR. DILLON: The big guys probably don't  
11 need a lot of help figuring out how to build a plant.  
12 I think they've got it down.

13 DR. KUBER: Right, right. But, I mean, we  
14 also don't want to exclude them, but -- you know, in  
15 case they do send their contractor or whoever to go  
16 take a look at things. But just to make sure that  
17 we're kind of, you know, covering both sides of the --

18 DR. WILLIAMS: Yeah. It really, really  
19 could be two separate sets of guidance. And I know a  
20 lot of older plants used to have, you know, very small  
21 square footage and then much larger square footage.

22 DR. KUBER: Yeah, yeah. And so are pieced  
23 together.

24 DR. DILLON: Yeah. Yeah, I think the  
25 product flow and those kinds of things, that guidance,

1 construction guidance, keeping in mind product flow  
2 and things like that is really key --

3 DR. WILLIAMS: Yes.

4 DR. DILLON: -- you know, to helping  
5 establishments get started on the right foot, and not  
6 spend a million dollars building a plant and realize  
7 they've baked in some problems, you know, before they  
8 ever engage with somebody from the regulatory side of  
9 things.

10 DR. WILLIAMS: Floor drains is a big one  
11 that I've run into.

12 DR. DILLON: Of course, yeah. That's a big  
13 one, for sure. Floor drains, and particularly red  
14 meat slaughter ceiling height.

15 DR. WILLIAMS: Yeah.

16 DR. DILLON: Rail height, you know,  
17 production flow for establishments that are doing both  
18 raw processing and ready-to-eat processing, you know,  
19 and production separation to prevent having to go  
20 through raw areas with ready-to-eat product. A lot of  
21 those things are really key, that establishments can  
22 really limit themselves unintentionally just by not  
23 having the information and not knowing.

24 DR. WILLIAMS: And I think they can provide  
25 that simply, so it would be good.

1 DR. DILLON: Yeah. I'll put that in and we  
2 can delve deeper into that on --

3 DR. WILLIAMS: Six.

4 DR. DILLON: -- on 6, yeah. So, I guess  
5 we'll move on to the second part of question 3 here.  
6 We talked about small plant outreach round tables, and  
7 casting a wider net on how to do that, and some  
8 different folks that they should talk to, as they  
9 publicize those things.

10 So I put, a second method FSIS should  
11 utilize to raise awareness of available resources in  
12 underserved communities is to expand engagement and  
13 accessibility to increase participation in small plant  
14 round table and town hall virtual meetings. This may  
15 be accomplished by increasing proactive engagement  
16 with state meat and poultry inspection programs, local  
17 health departments, local and regional meat processing  
18 academies and other educational centers, meat, poultry  
19 and other food trade organizations, small business  
20 associations and livestock associations.

21 FSIS should also develop a signup mechanism  
22 for meeting announcements. Any thoughts on that one?

23 MR. FILBRANDT: With announcements,  
24 development of a sign-in mechanism, or sign-up  
25 mechanism. They do have that.

1 DR. DILLON: Okay.

2 MR. FILBRANDT: I get them -- well I just  
3 got one. There was a meeting yesterday, a round table  
4 discussion that went on. I get them every -- shoot, I  
5 get almost daily notifications on it.

6 DR. DILLON: So maybe we should put, FSIS  
7 should also publicize, if I can spell the word  
8 publicize, the sign-up mechanism for meeting  
9 announcements.

10 MR. FILBRANDT: Yeah, so people know where  
11 to go -- I guess not where to go, but I need to be  
12 able to find them somehow.

13 DR. DILLON: Yeah, to know that there is a  
14 sign-up. You can't get on the list if you don't know  
15 the list exists. All right. The third thing we  
16 talked about on this one is utilizing FSIS staff,  
17 particularly EIAOs, to make people aware of resources.  
18 So the way I put this was, a third method FSIS should  
19 utilize to raise awareness of available resources in  
20 underserved communities is to reemphasize to FSIS  
21 personnel, particularly compliance and EIAO personnel,  
22 that a key part of their job duties is to proactively  
23 connect establishments and prospective establishments  
24 with targeted resources and assistance that may  
25 benefit that specific establishment.



1           And I mean that not just to say hey, here's  
2 the website. You know, it's got to be more than that.

3           DR. WILLIAMS:           Maybe instead of  
4 establishment, because some of these are not yet  
5 established, but to prospective entrepreneurs or some  
6 word.

7           DR. DILLON:   Yeah.   So, establishments and  
8 prospective establishments or -- do you have a  
9 suggested wording other than prospective  
10 establishments?

11          MS. GALLIMORE:   Yes.

12          DR. WILLIAMS:   (Indiscernible).

13          DR. DILLON:   Oh, okay.

14          DR. KUBER:     Well, but James, aren't we  
15 trying to connect people who know how to do this with  
16 people who may have questions, and so the EIAO is a  
17 great interconnector between establishments that are  
18 already operating and people that either want to go  
19 ahead and get the federal, under federal inspection or  
20 even start a new one, a new small or very small  
21 business. So, is that the spirit right here?

22          DR. DILLON:    I think that what they're  
23 talking about is, a lot of people's first interaction  
24 with regulatory agencies, whether that's state or  
25 federal, is the compliance officer. Also, if you've

1 got an issue in your plant, or you're wanting  
2 essentially an assistance interaction, right, you may  
3 be talking with EIAO personnel. And those are great  
4 people --

5 DR. KUBER: Gotcha.

6 DR. DILLON: -- to take that on.

7 DR. KUBER: Yeah.

8 DR. DILLON: And I think what we're kind of  
9 getting at here is, it should be part of their job,  
10 not just to say, what you proposed to me does not meet  
11 regulatory requirements, you know, according to 9  
12 C.F.R., insert number, right?

13 It's more like hey, this doesn't meet  
14 requirements, but there's some resources that you  
15 should, you could find, right here, on this topic that  
16 may help you, you know, convert this to something that  
17 does meet requirements.

18 DR. KUBER: Cool. Okay, got you.

19 MR. FILBRANDT: With that point, I can say  
20 good luck on getting them to do it. I hear what we're  
21 trying to say, but they -- my inspectors will like,  
22 don't you have somebody you can call? You know. I  
23 do. I mean, I have tons of people, but again, that's  
24 me.

25 DR. DILLON: Right.

1 DR. KUBER: Well what about suggesting that  
2 FSIS actually assign someone within the inspection  
3 force, or additional hires or whatever, to try to  
4 alleviate either the load on the EIAOs so they can do  
5 this, or actually do something like this, but they  
6 have EIAO experience?

7 DR. DILLON: I think we've got that,  
8 actually, down the page.

9 DR. KUBER: Okay, okay.

10 DR. DILLON: Yeah. Yeah, because we got  
11 that on 5.

12 DR. KUBER: We've got people that have  
13 retired out of the inspection system that we're  
14 utilizing to help with some small processors when they  
15 have issues. And so, you know, but those are by word  
16 of mouth. You know, it's like hey, there's -- you  
17 know, there's a guy over on the western side of  
18 Washington, and one in Central Washington that, you  
19 know, utilizing two of them and, you know, maybe  
20 that's something they put up, you know, if they have a  
21 list or something.

22 But, you know, again it's how do you  
23 navigate that, and who goes on that list, and --

24 DR. DILLON: Yeah. I think that's what  
25 we're talking about here in the guidance document.

1 DR. KUBER: Right.

2 DR. DILLON: And in the one we have here in  
3 Texas, we do have a page, actually maybe two pages,  
4 devoted to links to various organizations like  
5 Southwest Meat Association, Texas Association of Meat  
6 Processors, American Association of Meat Processors,  
7 International HACCP Alliance, a lot of those resources  
8 for folks. And I think that that's a key thing, to  
9 put people in contact with those folks that can get in  
10 there and help them navigate this, because it's hard.

11 On this third bullet, anything else we  
12 should put in there? I think we can -- we go a little  
13 farther on some of those ideas in a subsequent one,  
14 but they're asking here about what they should do to  
15 raise awareness of available resources in underserved  
16 communities.

17 I think some of the actions could, can go a  
18 little farther than that. But I think what we're  
19 saying here in this third one here is that they should  
20 reemphasize to their people, hey, part of your job is  
21 to connect these people with these resources, and not  
22 just say, go to the website.

23 DR. WILLIAMS: And they have been assigned a  
24 portion of outreach responsibilities.

25 DR. DILLON: Yeah. I think that's actually

1 part of their job description and, you know,  
2 emphasizing that to folks, I think, is key.

3 Casey, I think you had some stuff about this  
4 yesterday. Do you think this adequately addresses  
5 this piece of it? I think there's more later.

6 MS. GALLIMORE: Yeah, no, I think it does.

7 DR. DILLON: Great. I just wanted to check  
8 in with you, because I think you brought some of this  
9 stuff up yesterday with EIAOs.

10 Any other comments on this bullet here?  
11 Okay. The last one I've worked into for this question  
12 was, FSIS should also consider forming a partnership  
13 with the Small Business Administration to help connect  
14 underserved communities with available resources. I  
15 think that was --

16 Casey, that may have been a suggestion you  
17 had yesterday. Should we flesh that out a little bit  
18 more, or is that sufficient, do you think?

19 DR. WILLIAMS: Well James, I had suggested  
20 that really early on yesterday about can FSIS point  
21 people to any more resources, including the Small  
22 Business Administration. I think a number of people  
23 on this call mentioned that there were other financial  
24 services, and we already mentioned the grant system,  
25 and so on and so forth.

1           I don't know about financing a plant, but I  
2 was just thinking that might be one federal stop, but  
3 maybe there were state resources, or something that  
4 would help someone who wanted to get into this area.  
5 I mean, it's decent as it stands, but I don't know if  
6 there were any other resources we wanted to tag there.

7           DR. DILLON: I'm not sure.

8           MR. FILBRANDT: Usually the Small Business  
9 Association can get most of the resources, or know of  
10 them. So if they were to partner with them and say  
11 hey, go to this person at the Small Business  
12 Association and they will have the resources there, I  
13 know I've contacted them about trying to get moneys  
14 and, you know, grants and so on.

15           And there's different loans that are  
16 available through the Small Business Association, and  
17 they're a good organization for it.

18           DR. DILLON: All right. Well, if we think  
19 that's kind of sufficient to just suggest that they  
20 explore that partnership, that may be kind of a good  
21 touchpoint for folks. So if we're good on that one,  
22 we can move to question 4.

23           This one was kind of interesting. When I  
24 first read this one, I thought well, what do you mean,  
25 what are the datasets? Don't you have those? But

1 what they asked was, what datasets or other resources  
2 are available to assist FSIS in identifying  
3 underserved communities that would benefit from  
4 increased slaughter and processing capacity?

5 DR. ROGERS: Well James, I mean, really  
6 quick, I formerly worked for FSIS. They may have it,  
7 but they may not know where it is. Right, so --

8 DR. DILLON: Yeah. Well some of this stuff  
9 they definitely have, and they could access pretty  
10 easily, I think, through PHIS. But, you know, the  
11 first thing we talked about here, FSIS should consider  
12 analyzing data from FSIS sources, asking the following  
13 questions. How many individuals are contacting FSIS  
14 and expressing interest in starting meat and poultry  
15 businesses in a 12-month period?

16 How many businesses actually apply for  
17 inspection in a 12-month period? How many businesses  
18 that apply for inspection actually obtain a grant of  
19 inspection in a 12-month period? And how many  
20 businesses that obtain a grant of inspection in a 12-  
21 month period are still open one year after receiving a  
22 grant of inspection?

23 I kind of inserted the 12-month period part,  
24 because I felt like we probably needed to put some  
25 kind of scope on it. But that's, that was just kind

1 of an addition there. Anybody have any suggestions on  
2 that piece?

3 DR. WILLIAMS: Should we add something,  
4 James, on the last bullet there, about those obtaining  
5 a grant of inspection are still open one year after  
6 not only receiving the grant, but after beginning  
7 operations? Because I know of some that actually get  
8 a grant but don't actually may not start an operation  
9 until after a year.

10 DR. DILLON: That's a good point. Yeah.  
11 So, I'll revise that to, how many businesses that  
12 obtain a grant of inspection in a 12-month period are  
13 still open one year after receiving a grant of  
14 inspection and beginning operations?

15 DR. WILLIAMS: Yeah.

16 DR. DILLON: There we go. Yeah, that's a  
17 great point. All right.

18 MR. FILBRANDT: Once they do all this work  
19 and find out, you know, how many applications have  
20 been done, are they actually following up with these  
21 people to say hey, are you interested? Is there  
22 issues? Why are you not going to? You know, it's all  
23 great if they've got that, but if they follow up with  
24 any of these people to find out what issues they had  
25 and why they weren't going to become USDA.



1 DR. WILLIAMS: Good point.

2 DR. DILLON: I think maybe we could say  
3 something in here about FSIS should conduct follow-up  
4 surveys to determine why interested, or maybe common  
5 reasons why interested parties decided not to pursue  
6 FSIS inspection.

7 DR. WILLIAMS: Good point.

8 DR. DILLON: Or why -- or common reasons why  
9 businesses which obtained a grant of inspection  
10 closed, or maybe ceased operations -- I guess obtained  
11 a grant of inspection and started -- well, why  
12 businesses which obtained a grant of inspection either  
13 failed to begin operations, or ceased operations  
14 within one year?

15 And then, maybe further analysis of that  
16 data should be evaluated for the impact on underserved  
17 communities? What do we think of that?

18 MR. FILBRANDT: Looks good to me, because  
19 it's no different than anybody in business, or me with  
20 cold packing. If I'm packing for somebody and they  
21 quit coming to me, I need to reach out and find out  
22 well, was there a problem? You know, what went on  
23 and, you know.

24 DR. DILLON: Yeah.

25 DR. WILLIAMS: Do we need to qualify that

1 within a year? Or, I mean it -- I think it would  
2 be --

3 DR. DILLON: Maybe beyond.

4 DR. WILLIAMS: Yeah, just obtain it, you  
5 know, period.

6 DR. DILLON: Sure. All right. The next  
7 thing we talked about here is, FSIS should also  
8 consider reaching out to state departments of  
9 agriculture, extension offices, local USDA offices,  
10 Farm Bureau, community development organizations --  
11 maybe and community development organizations,  
12 regarding the number of inquiries they receive  
13 regarding how to obtain a grant of inspection or how  
14 to start a meat and/or poultry business.

15 The wording is a little awkward in there,  
16 with the double use of regarding.

17 DR. WILLIAMS: Take out the second regarding  
18 and put about.

19 DR. DILLON: There we go. Any other  
20 comments on that one? The next one here is, FSIS  
21 should consider obtaining population and  
22 livestock/producer density data to target outreach  
23 activities to underserved areas. This may include an  
24 analysis of numbers and locations of large and small  
25 livestock operators in relation to large and small

1 slaughter and processing establishments, including  
2 establishments under both FSIS and state inspection.

3 Particular interest should be paid to the  
4 locations of small livestock producers with respect to  
5 locations of smaller slaughter facilities.

6 DR. KUBER: Should we make a call out again  
7 to consider the definition of what's small?

8 DR. DILLON: Sure.

9 DR. KUBER: I mean, just because -- I mean,  
10 because I think if we keep this repetitive -- maybe  
11 they'll take heed.

12 DR. DILLON: Yeah. You have any suggestion  
13 on how to work that in here?

14 DR. KUBER: How did we have it up above with  
15 the small establishments? Or were we going to expand  
16 that further later on?

17 DR. DILLON: I think we were going to talk  
18 about that in 6.

19 DR. KUBER: So maybe as mentioned in the  
20 bullet, I mean, whatever the bullet point number was,  
21 up above, you know, just again, something about  
22 assuring the definition of small, or -- I'm trying to  
23 think of the right wording for that.

24 DR. DILLON: Maybe we could reference, FSIS  
25 should also consider --

1 DR. KUBER: Reevaluation, or --

2 DR. DILLON: Report, maybe reporting this  
3 data after a -- if reanalysis is the word, maybe after  
4 reevaluation of classifications, classification  
5 definitions?

6 DR. KUBER: Yeah, size classification.

7 DR. DILLON: That'll work. Maybe, this  
8 suggestion will be explored further under question 6?

9 DR. KUBER: Yes. Yeah.

10 DR. DILLON: Okay. And then, the last one  
11 we have here is, FSIS may wish to partner with the  
12 Centers for Disease Control, utilizing FoodNet, to  
13 explore a comparison of foodborne illness location  
14 data and source by population demographics. Did that  
15 capture the suggestion from yesterday?

16 (No response.)

17 DR. DILLON: All right. Hearing no  
18 objection, if everybody's good, we can move on to  
19 question 5. What concrete actions can FSIS take,  
20 alone or in partnership with other stakeholder  
21 organizations, to most effectively stimulate increased  
22 slaughter and processing capacity in underserved  
23 communities?

24 And I phrased thing this way because we kept  
25 coming back to the same thing yesterday, that the

1 single most impactful action FSIS could take is to  
2 publish a clear, concise guidance document that points  
3 prospective applicants to resources for determining  
4 whether or not they need inspection, how to apply for  
5 inspection, how inspection works, and how to begin the  
6 process of designing a production facility that  
7 complies with regulatory requirements.

8           In particular, the document should provide  
9 guidance on facility construction, product flow,  
10 written food safety systems, such as SSOP, HACCP,  
11 recall plans, laboratory testing and prerequisite  
12 programs, and potentially guidance for engaging with  
13 other regulatory entities that may have jurisdiction  
14 impacting meat and poultry businesses.

15           Such a document should also include how to  
16 access outreach services through the system, and the  
17 process of meeting regulatory requirements to  
18 obtaining a grant of inspection.

19           These outreach services may include but are  
20 not necessarily limited to trade organizations, state  
21 departments of agriculture, extension offices,  
22 academic institutions, local health departments, state  
23 meat and poultry inspection programs, local community  
24 development offices, and FSIS websites, district  
25 office points of contact, state and federal compliance

1 personnel and EIAO personnel.

2           This document should also be available in  
3 multiple languages sufficient to reach underserved  
4 populations. Stakeholder input should be utilized  
5 throughout the process -- maybe throughout the  
6 development process, or maybe development and  
7 publication process -- maybe just development process?  
8 And social media should be used to advertise the  
9 availability of the guide.

10           Second thing here, FSIS should utilize EIAO  
11 personnel to conduct outreach onsite and outreach  
12 visits for prospective establishments from less of a,  
13 quote/unquote, "regulatory perspective," and more of  
14 a, quote/unquote, "consultative perspective."

15           FSIS should consider allocating individuals  
16 entirely to this task, instead of making it a portion  
17 of their responsibilities. This is where, this is the  
18 bullet where I said earlier that we got further into  
19 this EIAO portion. Did that address the target?

20           DR. WILLIAMS: Maybe clarification there, a  
21 portion of existing employee responsibilities.

22           DR. DILLON: All right. Next one here,  
23 state meat and poultry inspection programs have  
24 historically been a key provider of inspection  
25 services to underserved communities, however the

1 clear prohibition on entry of at least equal-to state  
2 inspected products into interstate commerce forces  
3 these establishments to choose between state  
4 inspection and a potential expansion of their  
5 business.

6 Many of these establishments make the choice  
7 to accept this FSIS-imposed limitation on their growth  
8 in order to maintain state inspection, which limits  
9 the benefits those establishments provide to their  
10 underserved community, including employment  
11 opportunities and food security.

12 FSIS should lift the prohibition on entry  
13 into interstate commerce for products from state-  
14 inspected establishments under the inspection of at  
15 least equal-to state meat and poultry inspection  
16 programs. Prohibition on these products entering  
17 international commerce should remain.

18 We didn't talk about that last part  
19 yesterday, however I think that, you know, that  
20 probably has some significant international trade  
21 implications. And so that kind of brings us to the  
22 end here, brings us to question 6.

23 I don't have anything down right now on  
24 question 6, but we talked about putting some  
25 additional things together on that, so I can -- I

1 think we talked about some of the solid waste disposal  
2 and wastewater disposal going under here, as well as  
3 we talked about something right here, with the size  
4 classifications. Should we start with -- do we want  
5 to start with the waste issue or the size  
6 classification issue?

7 DR. WILLIAMS: Probably the size.

8 DR. DILLON: Sounds good. Current size  
9 classifications categorize a small -- or categorize  
10 businesses, or meat and poultry businesses by their  
11 number of employees. There is a tremendous difference  
12 between an establishment with up to 500 employees  
13 and -- what is the cutoff, does anybody know, between  
14 small and very small?

15 MR. FILBRANDT: I believe it's 25.

16 MS. GALLIMORE: It's ten.

17 DR. WILLIAMS: Ten.

18 MS. GALLIMORE: Yeah.

19 DR. WILLIAMS: It's ten.

20 MS. MARRERO SANCHEZ: It's ten, and \$2.5  
21 million in annual sales, for very small.

22 DR. DILLON: Do we know what the annual  
23 sales cap for a small is?

24 MS. MARRERO SANCHEZ: This is Angelica.  
25 There is no cap.



1 DR. DILLON: Oh, there is no cap?

2 MS. MARRERO SANCHEZ: For very small.

3 DR. DILLON: All right. So should we talk  
4 about annual sales? Or should we leave it employees,  
5 or what do you think?

6 MR. MOHSENI-MATLAGH: Employees seems to be  
7 a better indicator, because differently, the sales,  
8 with the changing prices of the commodity keeps going  
9 up and down.

10 DR. DILLON: Yeah. That's -- yeah. Two and  
11 a half million dollars isn't the same as two and a  
12 half million dollars ten years ago, that's for sure.

13 MS. GALLIMORE: It's also very -- I feel  
14 like it's not necessarily as fair of a way to judge,  
15 based on what type of product you're selling. I mean,  
16 are you --

17 DR. DILLON: Absolutely.

18 MS. GALLIMORE: -- kind of a very high merch  
19 item, or --

20 DR. DILLON: Absolutely. I mean, we've seen  
21 HRI numbers go up precipitously, but I don't know that  
22 that classification number has gone up. Yeah, it  
23 wasn't very long ago that HRI limitations were  
24 something like \$60,000 or something like that, and now  
25 it's almost \$100,000. And that's over not very many

1 years. So, inflation -- I'm sure everybody on the  
2 call knows a little bit about inflation these days.

3 But, so I think we can focus on the employee  
4 numbers here. So, does 500 still allow them to be  
5 classified as small, or does that number 500 trigger  
6 large?

7 DR. WILLIAMS: 499, I think.

8 DR. DILLON: Yeah. That's what I was  
9 getting at. We don't have a whole of plants under our  
10 inspection in Texas with 499 employees, so. But, you  
11 know, that's exactly the point, right. There's a huge  
12 difference between an establishment with 499 employees  
13 and an establishment with 11 employees. We definitely  
14 have several plants with 11 employees. And they're  
15 nothing like a plant with 499 employees.

16 So, maybe FSIS should consider defining, or  
17 maybe an additional size classification?

18 MS. GALLIMORE: I would just say they need  
19 to relook at the size classification in this specific  
20 context, or is this just automatically adopting --

21 DR. DILLON: Maybe should reevaluate their  
22 size classification, their size classification system,  
23 to group establishments with like establishments, or  
24 is there a better way to say that? To better group  
25 similar establishments in size classification

1 categories?

2 DR. KUBER: Is there any breakdown at 500  
3 employees or more?

4 DR. DILLON: Yeah, I think that that's just  
5 large.

6 DR. KUBER: Large?

7 DR. DILLON: And if you got 500, you're  
8 large.

9 DR. KUBER: But they're all grouped -- yeah,  
10 anything over 500 or more is large.

11 DR. DILLON: Right. Yeah. Five hundred's  
12 the same as five thousand.

13 DR. ROGERS: Yeah, yeah.

14 DR. KUBER: Yeah, I didn't think there was  
15 any other. I just was asking to see I was missing  
16 something there.

17 MS. GALLIMORE: Yeah. I know it has been  
18 problematic too, but not in this -- not for this  
19 context, I don't think, as much.

20 DR. DILLON: Yeah, probably not through the  
21 underserved communities lens. But I think if we're  
22 really asking them to -- maybe we should, we could  
23 say, reevaluate the entirety of their size  
24 classification system.

25 MR. FILBRANDT: Going on that, like I said,

1 I am also Vice President of AAMP. We've got 1,500  
2 members, and I think 95% of them are under 100  
3 employees.

4 DR. DILLON: Yeah.

5 MR. FILBRANDT: And we represent the small  
6 and very small plants.

7 DR. DILLON: I think that that size category  
8 probably reflects just about every plant under state  
9 inspection in the country, just about. It is the same  
10 group of folks you're talking about, Scott, and I  
11 think that, you know, really it represents the  
12 predominance of establishments under FSIS inspection.

13 We recently ran some numbers here in Texas  
14 in response to a legislative question that came  
15 across, and the vast majority of those plants -- you  
16 know, FSIS inspects over 200 plants in Texas. I think  
17 27 of them are large. That's most of the plants in  
18 the country.

19 DR. KUBER: Well, and maybe that's a survey  
20 to state department of ags, as well as the  
21 associations that we have out there that are partners,  
22 to identify, you know, what's a more equitable  
23 breakdown.

24 DR. DILLON: Yeah. Maybe we should put  
25 something in here at the end to say, where we say,

1 FSIS should reevaluate the entirety of their size  
2 classification system to better group similar  
3 establishments in size classification categories, and  
4 just say, stakeholder input should be obtained.

5 MS. GALLIMORE: Yeah, agreed.

6 DR. KUBER: Yeah, I think -- I mean, we  
7 can't just put a number on it. I think trying to  
8 identify what's actually out there, and then  
9 establishing -- and that -- you know, that may change  
10 in 20, 30 years or it may not. But I think trying to  
11 reach out to the stakeholders to figure that out is  
12 going to be the best option.

13 DR. DILLON: So stakeholder input should be  
14 obtained throughout this process with an emphasis on  
15 small and very small establishments?

16 MR. FILBRANDT: With that, on the very  
17 small, if I -- or the small, if I was to hire three  
18 more employees, it would put me in the small category  
19 because I do over \$2.5 million a year.

20 DR. DILLON: Well and that probably actively  
21 discourages you from hiring three people.

22 DR. WILLIAMS: Yes.

23 MR. FILBRANDT: Yeah.

24 DR. DILLON: You know, and that's three  
25 people in your community that aren't going to get a

1 job.

2 MR. FILBRANDT: Yeah.

3 DR. DILLON: And if they -- it's a limit on  
4 your production and your business success. It's  
5 arbitrary, you know, just on a trigger point that  
6 maybe is not the right place.

7 MR. FILBRANDT: The problem is trying to  
8 find those three employees.

9 DR. DILLON: Well, yeah. I know what you're  
10 talking about, Scott, because I got to hire an  
11 inspector in that same spot, which is tough.

12 DR. WILLIAMS: Something that I've run into,  
13 James, and I'll throw it out to the rest of the  
14 committee, but in -- from a perspective of a potential  
15 very small or underserved community personnel, most of  
16 the documents that USDA has on their website, it's a  
17 menagerie of being referred to additional websites, or  
18 additional links and so forth.

19 So somehow word this as under the comments,  
20 is to, you know, let's simplify this document that  
21 we're talking about, and be concise in what we, you  
22 know, are putting out there too, so that it is easy to  
23 understand and is not so cumbersome. I don't know how  
24 we need to word that, but -- or if we need to, but  
25 that's just something that I find, and I hear

1 routinely, day in and day out.

2 DR. DILLON: Is that -- so, can you maybe go  
3 into a little bit more detail on that, and -- you  
4 know, to see if we should consider an additional item  
5 on that, in addition to our, like what we talked  
6 about, the guide up there?

7 DR. WILLIAMS: Well, in my opinion, it's  
8 across the board, because if you got to go, you're  
9 going to wind up going to at least a dozen different  
10 links, or at least --

11 DR. DILLON: Yeah.

12 DR. WILLIAMS: -- for me, till you finally  
13 get to something that, where you can utilize it. So,  
14 that's just something that I've run into. Maybe it's  
15 just me, but --

16 DR. DILLON: No, that's definitely not just  
17 you. I mean --

18 DR. WILLIAMS: I think (indiscernible).

19 DR. DILLON: Yeah. We look at that stuff a  
20 lot, and I think we all run into that. You know,  
21 maybe we could say something in here about, you know,  
22 FSIS should consider, you know, creating topic guides  
23 on there, to help people sort through the vast amount  
24 of information on the website. You think that gets to  
25 it?

1 DR. WILLIAMS: Just, you know, simplify the  
2 process. If you're going to refer to other things,  
3 you know, put it -- attach it there, so you don't have  
4 to go trying to search additional sources for it.  
5 But, you know, with this document, it doesn't need to  
6 be a thing that's full of other references or other  
7 links to try to go to.

8 And that's very easy to put that in, to  
9 avoid duplication, but that doesn't solve the  
10 obstacles of underserved or small communities or new  
11 entrepreneurs that are not techno savvy. And I'm  
12 certainly not, but more so than a lot of the  
13 individuals that I have worked with. I don't know  
14 how's a good way to wordsmith it other than, you know,  
15 simplify the processes and information.

16 DR. DILLON: Well, do you think it belongs  
17 in 6? Or there's a part up here about, I think in 3,  
18 to raise awareness of available -- well, it's not  
19 really raising awareness of the resources, I guess.

20 DR. WILLIAMS: No.

21 DR. DILLON: It's just making the resources  
22 easier to use.

23 MR. MOHSENI-MATLAGH: Yes.

24 DR. WILLIAMS: Exactly.

25 MR. MOHSENI-MATLAGH: Yes, under 3.



1 DR. WILLIAMS: I just, you know, I threw  
2 something down under 6 because I couldn't make it fit,  
3 necessarily, in the others, but maybe so, and I don't  
4 care.

5 DR. DILLON: Yeah. No, I think it's a good  
6 point. I think we ought to put something in here  
7 about it should -- FSI should evaluate the vast amount  
8 of information --

9 MR. MOHSENI-MATLAGH: Accessibility.

10 DR. DILLON: -- accessible on, you know,  
11 through FSIS websites to ensure, or maybe to improve  
12 ease of navigation --

13 MR. MOHSENI-MATLAGH: Yeah.

14 DR. DILLON: -- and assist, I guess maybe  
15 just say producers and prospective applicants with  
16 obtaining applicable information for a given topic in  
17 a clear, concise fashion.

18 MR. MOHSENI-MATLAGH: Yes.

19 DR. KUBER: Sure.

20 MR. MOHSENI-MATLAGH: Very good.

21 DR. DILLON: Maybe, and then just say, the  
22 current presentation of an overwhelming amount of  
23 information is confusing --

24 MR. MOHSENI-MATLAGH: Cumbersome.

25 DR. DILLON: -- you know, to the vast

1 majority of -- is cumbersome and confusing?

2 MR. MOHSENI-MATLAGH: Yeah.

3 DR. KUBER: Yeah.

4 DR. WILLIAMS: Yes.

5 DR. DILLON: I'm not sure if I captured that  
6 correctly. I'll read what I've got here and we can  
7 see if we can wordsmith it some more. FSIS should  
8 evaluate the vast amount of information accessible  
9 through FSIS websites to improve ease of navigation  
10 and assist producers and prospective applicants with  
11 obtaining applicable information for a given topic in  
12 a clear, concise fashion. The current presentation of  
13 a tremendous amount of information is cumbersome and  
14 confusing.

15 DR. WILLIAMS: Well said.

16 DR. FILBRANDT: Right.

17 DR. KUBER: Yeah.

18 MR. MOHSENI-MATLAGH: It's good.

19 DR. DILLON: Should we get to, should we get  
20 into the -- or any suggestions on like the wastewater  
21 issue and the inedibles issue at this point? So what  
22 would our suggestion -- like, to start with the  
23 wastewater issue, what would our suggestion be? You  
24 know, would we suggest that FSIS, you know, engage  
25 with environmental regulatory organizations and

1 attempt to impact wastewater standards in a manner  
2 that allows small and very small producers to continue  
3 operation without significant cost or impediment, or  
4 something like that?

5 MR. MOHSENI-MATLAGH: I have a question. I  
6 think it's very related to what you're asking.

7 DR. DILLON: Yeah.

8 MR. MOHSENI-MATLAGH: (Indiscernible).  
9 Scott, if you will, could you -- what percent of  
10 small -- especially those establishment that they do  
11 also harvesting, basically killing, have wastewater  
12 treatment facility at their plants?

13 MR. FILBRANDT: Let's see, I know -- just  
14 going here in Michigan, I'd say half of them. We've  
15 got 100 -- in Michigan's association, there's 120  
16 members now, and I'd say half of them are doing  
17 slaughter, and have a lagoon system.

18 MR. MOHSENI-MATLAGH: They do have like -- I  
19 mean, basically you are saying, all of those who do  
20 harvesting, they do have some sort of wastewater  
21 treatment plant?

22 MR. FILBRANDT: Yes. Most of it's a lagoon  
23 system, with land application sprinklers.

24 MR. MOHSENI-MATLAGH: Okay. Well, that  
25 makes it easier --

1 DR. DILLON: But I think it depends on what  
2 you mean by wastewater treatment. You know, those  
3 lagoon systems, you know, are what's common, I think,  
4 at these establishments. And they're really -- Scott,  
5 you may be able to explain a little bit better than I  
6 can how those work, but I think it's -- you know,  
7 there's the -- the solids precipitate down, and the  
8 water is on the top. Then they get rid of the water  
9 with like a sprinkler system.

10 I don't know that there's any like, you  
11 know, any chemical treatment or anything like that,  
12 is --

13 (Simultaneous speaking.)

14 DR. DILLON: I'm not particularly  
15 knowledgeable about that.

16 MR. MOHSENI-MATLAGH: I mean, at least the  
17 one that we have at AFG is like that, and then also  
18 use of polymer to basically allow the particulate  
19 matter to coagulate around (indiscernible), and then  
20 is skimmed off, and it can really make a very --  
21 relatively of course, but clean, new water that could  
22 be discharged into the rivers.

23 So, I mean, I just wanted to see, if the  
24 smaller establishments that we are trying to find a  
25 way to help them out, whether they do have it, or

1 yeah, for the processing, they really don't have a  
2 whole lot, it could be. But at least for the one that  
3 do harvesting, there's a lot of blood and other stuff  
4 that goes into it.

5 But it's a huge, definitely, task but how we  
6 want to -- or is it a way that other agencies, in  
7 cooperation with FSIS, at least can come up with an  
8 incentive for all of those smaller processor, is that  
9 actually the people who harvest, financially be able  
10 to make some of the (indiscernible), like a major  
11 expenditure.

12 MR. FILBRANDT: Yeah, I think that's the  
13 biggest thing that we just need to key in on, is they  
14 need to be talking with other government agencies, so  
15 they know what's going on, that's going to affect  
16 these plants.

17 MR. MOHSENI-MATLAGH: Yeah.

18 DR. DILLON: Yeah. I suppose there's  
19 multiple ways that they could go at that issue but,  
20 you know, I would think that putting that type of a  
21 wastewater system in would be cost prohibitive, you  
22 know, to a lot of, you know, very small slaughter  
23 establishments. I may be wrong about that. You know,  
24 Scott, you may know more about it than I do on this,  
25 you know, about how practical that would be.

1           You know, certainly one way the government  
2 could approach that is, if they're wanting to insist  
3 on these standards, you know, they could do grant  
4 programs and stuff like that. But, you know, one  
5 thing that I could see as a pitfall down that road is,  
6 if an establishment say, receives a grant, and builds  
7 one of these systems, and then goes out of business  
8 for whatever reason, 18 months later, now that system  
9 is just sort of sitting there.

10           And I don't know if that's an issue in and  
11 of itself or not, but it sounds like a tremendous  
12 waste of money if that were to happen.

13           MS. MARRERO SANCHEZ: Sorry, this is your  
14 five-minute warning. We will break for lunch in five  
15 minutes.

16           DR. KUBER: But you run that -- James, you  
17 run that risk with any grant program.

18           DR. DILLON: Sure.

19           DR. KUBER: I mean, so if they build a new  
20 cooler, or a new kill floor, or an expansion, or a  
21 whole new plant --

22           DR. DILLON: A hundred percent.

23           DR. KUBER: And -- yeah, so --

24           DR. DILLON: I guess it's -- I guess they  
25 could go about it either by a standards perspective

1 of, you know, providing, you know, an exception to a,  
2 you know, to those standards, you know, up to a  
3 certain amount of gallons, or up to a certain body or  
4 more, up to a certain establishment size.

5           They can go about it that way, or they could  
6 go about it by helping establishments meet the  
7 standards. But, you know, Scott, I think you  
8 referenced yesterday that, you know, some of these  
9 standards are, you know, that they're proposing are  
10 really pretty extreme.

11           So, but I think we could maybe raise this  
12 point in sort of a neutral manner, not necessarily  
13 tell them how to address it, but to tell them that  
14 they need to engage with it, and make sure that  
15 whatever comes across isn't, you know, disastrous for  
16 small and very small producers, right. And that's  
17 probably the bottom line.

18           MR. MOHSENI-MATLAGH: That's fair. That's a  
19 fair statement. At least bring it to their attention,  
20 that this issue exists.

21           DR. DILLON: Right.

22           DR. KUBER: Yeah, and I think everything  
23 that we've written here, I mean, to this point, it's  
24 an awareness campaign that there's different --  
25 differences exist. You know, not all plants are

1 created equal. If you've got one employee versus 500,  
2 there's -- it may be still a meat plant, but  
3 there's -- they're different. And they may not have  
4 access to the same resources and opportunities.

5 DR. WILLIAMS: Same thing, we were talking  
6 about the solid waste. There has been some thoughts  
7 kicked around in some of my arenas of the regional  
8 establishment, but maybe FSIS could work with existing  
9 rendering agencies to facilitate some way to be able  
10 to better serve the small and very small, you know,  
11 facilities, whether it be a pickup system, or a  
12 commonality point, or something, just to make the  
13 awareness of it.

14 DR. KUBER: Yeah. We've -- you know, we've  
15 been toying with the idea, you know, talking about,  
16 you know, whether it's the university or the state  
17 department of ag having like a regional, or a central  
18 state location where small processors could come into.  
19 You know, that's a pipe dream. I don't know that it  
20 will occur but, you know, another thing comes to mind  
21 is helping to facilitate maybe a cooperative type  
22 effect, where you do have regional drop-off points.

23 You know, a large facility, you know, 500  
24 employees or more, or even up to 499, they may have,  
25 you know, in-house rendering up to a certain point,



1 but then they also have a volume of the things that  
2 they don't want to handle to be able to share. And a  
3 lot of these small facilities don't have that  
4 opportunity, because they just can't fill a truck, or  
5 at least not within a reasonable amount of time before  
6 the product goes bad.

7 DR. DILLON: Right.

8 MS. MARRERO SANCHEZ: Hello. We are about  
9 to go back to the full group. I believe we're going  
10 back to the full group. So maybe it's a good time to  
11 drop in, and we'll get back to it after lunch.

12 DR. DILLON: Yeah. We have some more time  
13 after lunch, correct?

14 MS. MARRERO SANCHEZ: Yeah. You have until  
15 2:25.

16 DR. DILLON: Okay. I think we're on a great  
17 pace, everybody. I'll read through this last one here  
18 so we can kind of put a pin in this one. FSIS should  
19 proactively engage with environmental regulatory  
20 agencies to ensure that proposed revisions to  
21 standards governing the discharge of wastewater from  
22 meat and poultry slaughter and processing  
23 establishments are not significantly detrimental to  
24 small and very small meat and poultry businesses.

25 Okay. And then we can get after the solid

1 waste issue after lunch. Does that sound good to  
2 everybody?

3 DR. KUBER: Sure.

4 MR. FILBRANDT: Agreed.

5 DR. ROGERS: Hell yes.

6 MR. MOHSENI-MATLAGH: Yes.

7 DR. DILLON: Thanks, everybody, for a great  
8 meeting this morning. I appreciate it.

9 MS. MARRERO SANCHEZ: Thank you. I am not  
10 sure -- I'm not seeing a pop-up asking me to go back  
11 to the bigger group this time, but there is a way for  
12 us to go back. I'm just awaiting instructions. I'll  
13 need a minute.

14 DR. DILLON: I'll continue to write some  
15 notes here, I guess, since we have the time.

16 MS. MARRERO SANCHEZ: You got a few extra, a  
17 few extra seconds.

18 (Pause.)

19 MS. MARRERO SANCHEZ: My apologies. I  
20 requested help, so Teagan (ph.) should be joining.

21 DR. DILLON: Well, while we've got a minute,  
22 I put up, FSIS should explore options to assist small  
23 and very small meat and poultry establishments in  
24 areas underserved by rendering resources. This may  
25 include options such as incentive programs or central

1 collection points, maybe a -- but should seek to give  
2 underserved communities options on how to meet  
3 regulatory requirements for inedible disposal in a  
4 practical manner. Any other thoughts on that one?

5 DR. ROGERS: No.

6 DR. DILLON: Okay.

7 DR. ROGERS: Very well.

8 DR. DILLON: Well, I guess that -- I think  
9 we're at the end here, so, of what we've actually been  
10 charged with. I think maybe we get back together  
11 after lunch, go through the whole document on more  
12 time, see if there's any additions, and we want to  
13 fine tune things before we present it in the plenary  
14 session this afternoon.

15 But, then of course if anybody thinks of  
16 anything over lunch, we can -- to add to these, we've  
17 certainly got time to work through it. But I really  
18 appreciate the teamwork on this and the collaborative  
19 thoughts by everybody.

20 MS. MARRERO SANCHEZ: Yes. Thank you very  
21 much. So, we will be coming back to the breakout  
22 sessions after lunch, so I believe we can just go.  
23 And we'll be back here in the same room. Last time, I  
24 did not leave the meeting, I just muted and turned off  
25 my camera, and came back, to avoid any hiccups.

1           So that might be the best option, to just  
2 leave it running and mute and stop your video and come  
3 back to the same room. But if you happen to have any  
4 issues trying to rejoin -- oh, sorry. Change of  
5 plans. We'll go back to the room, and then we'll do  
6 the same format, my apologies, in a moment.

7           But anyway, if you have any issues when you  
8 try to log back in, you can request help, if you click  
9 on Participants when you get here, or just send me a  
10 note, or send Katrina a note, or put a comment in the  
11 chat and we'll figure out how we can help you.

12           Anytime now, we'll go back to the big room.  
13 I just got the warning. In a minute, we'll go back.  
14 And we'll see you again at 1.

15           (Off the record.)

16           (On the record.)

17           MS. MARRERO SANCHEZ: Welcome back. I think  
18 we're all still on our way here, so let's give it a  
19 minute. Okay, are we all set?

20           COURT REPORTER: Yes, we're all set.

21           MS. MARRERO SANCHEZ: Wonderful. All right.  
22 So, this is the last breakout session for the two  
23 subcommittees. As I mentioned earlier, try to  
24 identify yourselves when you're speaking and provide  
25 verbal comments. You are already on it, preparing a

1 report for presenting to the full committee. And let  
2 me know if you have any questions or any technical  
3 issues.

4           The group will have until 2:15, when we'll  
5 go on break, and then we will go back to the full  
6 committee at 2:25. Again, I will let you know when  
7 you have a few minutes left, so you can wrap up. And  
8 I think we're going to use the same format of going  
9 back to the full committee before going on break, but  
10 I will confirm, and when I find out, towards the end  
11 of the session, I will let you know for sure.

12           Other than that, if you have any questions  
13 or any issues that you want to report, let me know.  
14 If not, I'll hand it over to Dr. Dillon and everyone  
15 else.

16           DR. DILLON: All right. Good afternoon,  
17 everyone. I think we're really just about finished  
18 up. I'll go ahead and reread the last bullet that we  
19 did about rendering, just so we can make sure that  
20 everybody's had plenty of opportunity to comment on  
21 that, and then we can kind of proceed back to the  
22 beginning of the document, and see if there's any  
23 further edits we need to make.

24           So this last one I've got here is, FSIS  
25 should explore options to assist small and very small

1 meat and poultry establishments in areas underserved  
2 by rendering resources. This may include options such  
3 as incentive programs or central collection points,  
4 but should seek to give underserved communities  
5 options on how to meet regulatory requirements for  
6 inedible disposal in a practical manner.

7 Oh, I need to share my screen. I'm sorry.  
8 There we go, and I'll increase the size here for  
9 everybody. Any comments on that last one, I'll  
10 highlight right here?

11 (No response.)

12 DR. DILLON: All right. Well, I think we'll  
13 just go through and start from the top and see if  
14 there need to be any additional edits. I made one  
15 small edit to the interstate commerce, under state  
16 equal, at least equal-to programs, to account for the  
17 Cooperative Interstate Shippers program, and the  
18 Talmadge-Aiken program, but that's a, it was a fairly  
19 small edit. You can see that was we read through.

20 All right. Question 1, what obstacles  
21 impede individuals in underserved communities from  
22 accessing FSIS' information resources? One type of  
23 obstacle that exists in more rural areas throughout  
24 the country is in actual access to information. This  
25 is partially due to a lack of availability of

1 broadband internet access in some areas.

2           There is also a lack of available local, in-  
3 person consultative services to connect underserved  
4 communities to FSIS information resources.  
5 Additionally, some underserved communities may have  
6 difficulty accessing information resources due to  
7 language barriers.

8           A second type of obstacle that exists is a  
9 lack of knowledge about where to start looking for  
10 resources or even knowledge about who needs  
11 inspection. There is a tremendous amount of  
12 information available online, but that can be  
13 overwhelming to someone who is not familiar with the  
14 industry. If you have any comments, feel free to jump  
15 on in here, otherwise I'll proceed.

16           Question 2, what barriers do individuals  
17 face when applying for FSIS inspection? The first  
18 fundamental barrier numerous individuals face when  
19 considering an application for inspection is a lack of  
20 access to capital. USDA attempted to address this  
21 barrier through grant programs. However, these grant  
22 programs all too often failed to reach underserved  
23 populations.

24           The grant process was too complicated for  
25 many producers to successfully navigate, in some

1 cases, even being complicated enough to require  
2 businesses to obtain the services of a grant writer.  
3 This put many prospective businesses from underserved  
4 populations at a significant disadvantage in obtaining  
5 a grant.

6           In addition, by targeting businesses  
7 classified as small or very small, according to  
8 existing size classifications based on employee  
9 numbers, these grants all too often ended up being  
10 seized by larger establishments. This may have  
11 included businesses that are individually classified  
12 as small, but are actually owned by much larger  
13 umbrella corporations, possessing greater resources  
14 and expertise to guide them through the grant  
15 application process.

16           A second fundamental barrier individuals  
17 face when applying for inspection is a lack of  
18 technical knowledge regarding what it takes to build  
19 and run a successful establishment. Many prospective  
20 businesses may not even know that they need  
21 inspection, let alone how to begin the process of  
22 obtaining inspection.

23           Currently, no clear, concise guidance  
24 document is published by FSIS that points prospective  
25 applicants to resources for determining whether or not



1 they need inspection, how to apply for inspection, how  
2 inspection works, or how to begin the process of  
3 designing a production facility that complies with  
4 regulatory requirements.

5           Such a document should also include how to  
6 access outreach services to assist them in the process  
7 of meeting regulatory requirements and obtaining a  
8 grant of inspection. This document should also be  
9 available in multiple languages sufficient to reach  
10 underserved populations.

11           A third barrier inhibiting many  
12 establishments in underserved communities from  
13 applying for U.S. FSIS inspection is their own desire  
14 to maintain state inspection as opposed to FSIS  
15 inspection. Many establishments make the choice to  
16 obtain or maintain state inspection despite the  
17 business limitations imposed by the FSIS prohibition  
18 on at least equal-to state-inspected products entering  
19 interstate commerce.

20           Participation in interstate commerce would  
21 have an undeniably positive effect on these businesses  
22 and their communities, with no negative impact on food  
23 safety as evidenced by annual audits of at least  
24 equal-to state meat and poultry inspection programs by  
25 FSIS.

1           Given the limitations faced by state-  
2 inspected establishments, coupled with the persistent  
3 choices made by many establishments -- excuse me,  
4 persistent choices made by many establishments to  
5 obtain and maintain state inspection, it stands to  
6 reason that at least equal-to state meat and poultry  
7 inspection programs are in some manner preferable to  
8 many establishments in underserved communities. This  
9 preference is therefore a barrier to these  
10 establishments applying for FSIS inspection.

11           An additional barrier to both new and  
12 existing establishments that appears to be emerging  
13 involves a regulatory burden environmental control  
14 agencies may place on meat and poultry production  
15 establishments regarding wastewater handling  
16 requirements.

17           Though these regulatory efforts are  
18 currently in an exploratory phase, the proposed  
19 changes would involve large expenses for small  
20 business owners -- excuse me, for small businesses, to  
21 hold, test and remove wastewater from their facilities  
22 far in excess of the current regulatory burden. This  
23 could have a disproportionate and potentially  
24 disastrous impact on small and very small meat and  
25 poultry processors.

1           Some establishments may also face  
2 difficulties in disposal of inedible materials.  
3 Underserved rural communities -- maybe we should say  
4 establishments in underserved? Underserved rural  
5 communities may incur a significant expense to dispose  
6 of these materials if they are located a significant  
7 distance from rendering establishments.

8           Question 3, what steps, outreach methods,  
9 partnerships or strategies should FSIS consider to  
10 raise awareness of its available resources in  
11 underserved communities? The first method FSIS should  
12 utilize to raise awareness of available resources in  
13 underserved communities is to publish a clear, concise  
14 guidance document that points prospective applications  
15 to resources for determining whether or not they need  
16 inspection, how to apply for inspection, how  
17 inspection works, and how to begin the process of  
18 designing a production facility that complies with  
19 regulatory requirements.

20           In particular, the document should provide  
21 guidance on facility construction, product flow,  
22 written food safety systems, such as SSOP, HACCP,  
23 recall plans, laboratory testing and prerequisite  
24 programs, and potentially guidance for engaging with  
25 other regulatory entities that may have jurisdiction

1 impacting meat and poultry businesses.

2           Such a document should also include how to  
3 assess outreach services to assist prospective  
4 applicants in the process of meeting regulatory  
5 requirements and obtaining a grant of inspection.

6           These outreach services may include but are  
7 not necessarily limited to trade organizations, state  
8 departments of agriculture, extension offices,  
9 academic institutions, local health departments, state  
10 meat and poultry inspection programs, local community  
11 development offices, and FSIS websites, district  
12 office points of contact, state and federal compliance  
13 personnel and EIAO personnel. This document should  
14 also be available in multiple languages sufficient to  
15 reach underserved populations.

16           A second method FSIS should utilize to raise  
17 awareness of available resource in underserved  
18 communities is to expand engagement and accessibility  
19 to increase participation in small plant round table  
20 and town hall virtual meetings.

21           This may be accomplished by increasing  
22 proactive engagement with state meat and poultry  
23 inspection programs, local health departments, local  
24 and regional meat processing academies and other  
25 educational centers, meat, poultry and other food

1 trade organizations, small business associations and  
2 livestock associations. FSIS should also publicize  
3 the sign-up mechanism for meeting announcements.

4 A third method FSIS should utilize to raise  
5 awareness of available resource in underserved  
6 communities is to reemphasize to FSIS personnel,  
7 particularly compliance and EIAO personnel, that a key  
8 part of their job duties is to proactively connect  
9 establishments and prospective establishments with  
10 targeted resources and assistance that may benefit  
11 that specific business.

12 FSIS should also consider forming a  
13 partnership with the Small Business Administration to  
14 help connect underserved communities with available  
15 resources.

16 Question 4, what datasets or other resources  
17 are available to assist FSIS in identifying  
18 underserved communities that would benefit from  
19 increased slaughter or processing capacity? FSIS  
20 should consider analyzing data from FSIS sources  
21 asking the following questions.

22 How many individuals are contacting FSIS and  
23 expressing interest in starting meat and poultry  
24 businesses in a 12-month period? How many businesses  
25 actually apply for inspection in a 12-month period?

1 How many businesses that apply for inspection actually  
2 obtain a grant of inspection in a 12-month period?  
3 How many businesses that obtain a grant of inspection  
4 in a 12-month period are still open one year after  
5 receiving a grant of inspection and beginning  
6 operations?

7 FSIS should conduct follow-up surveys to  
8 determine common reasons why interested parties  
9 decided not to pursue FSIS inspection, or common  
10 reasons why businesses which obtained a grant of  
11 inspection either failed to begin operations or ceased  
12 operations. Further analysis of this data should be  
13 analyzed for impact on underserved communities.

14 FSIS should also consider reaching out to  
15 state departments of agriculture, extension offices,  
16 local USDA offices, Farm Bureau and community  
17 development organizations regarding the number of  
18 inquiries they receive about how to obtain a grant of  
19 inspection, or how to start a meat and/or poultry  
20 business.

21 FSIS should consider obtaining population  
22 and livestock/producer density data to target outreach  
23 activities to underserved areas. This may include an  
24 analysis of numbers and locations of large and small  
25 livestock operators in relation to large and small

1 slaughter and processing establishments, including  
2 establishments under both FSIS and state inspection.

3 Particular attention should be paid to the  
4 locations of small livestock producers with respect to  
5 locations of smaller slaughter facilities. FSIS  
6 should also consider reporting this data after a  
7 reevaluation of size classification definitions. This  
8 suggestion will be explored further under question 6.

9 FSIS may wish to partner with the Centers  
10 for Disease Control, utilizing FoodNet, to explore a  
11 comparison of foodborne illness location data and  
12 source by population demographics.

13 Question 5, what concrete actions can FSIS  
14 take, alone or in partnership with other stakeholder  
15 organizations, to most effectively stimulate increased  
16 slaughter or processing capacity in underserved  
17 communities?

18 The single most impactful action FSIS could  
19 take is to publish a clear, concise guidance document  
20 that points prospective applicants to resources for  
21 determining whether or not they need inspection, how  
22 to apply for inspection, how inspection works, and how  
23 to begin the process of designing a production  
24 facility that complies with regulatory requirements.

25 In particular, the document should provide

1 guidance on facility construction, product flow,  
2 written food safety systems, such as SSOP, HACCP,  
3 recall plans, laboratory testing and prerequisite  
4 programs, and potentially guidance for engaging with  
5 other regulatory entities that may have jurisdiction  
6 impacting meat and poultry businesses.

7         Such a document should also include how to  
8 access outreach services to assist them in the process  
9 of meeting regulatory requirements in obtaining a  
10 grant of inspection. These outreach services may  
11 include but are not necessarily limited to trade  
12 organizations, state departments of agriculture,  
13 extension offices, academic institutions, local health  
14 departments, state meat and poultry inspection  
15 programs, local community development offices, and  
16 FSIS websites, district office points of contact,  
17 state and federal compliance personnel and EIAO  
18 personnel.

19         This document should also be available in  
20 multiple languages sufficient to reach underserved  
21 populations. Stakeholder input should be utilized  
22 throughout the development process, and social media  
23 should be utilized to advertise the availability of  
24 the guide.

25         FSIS should utilize EIAO personnel to



1 conduct onsite outreach visits for prospective  
2 establishments from less of a regulatory perspective  
3 to more of a, quote/unquote, "consultative  
4 perspective." FSIS should consider allocating  
5 individuals entirely to this task, instead of making  
6 it a portion of existing employee responsibilities.

7 State meat and poultry inspection programs  
8 have historically been a key provider of inspection  
9 services to underserved communities. However, the  
10 current prohibition on entry of at least equal-to  
11 state-inspected products into interstate commerce  
12 forces these establishments to choose between state  
13 inspection and a potential expansion of their  
14 business.

15 Many of these establishments make the choice  
16 to accept this FSIS-imposed limitation on their growth  
17 in order to maintain state inspection, which limits  
18 the benefits these establishments provide to their  
19 underserved community, including employment  
20 opportunities and food security.

21 Current options presented to states and  
22 establishments under the Cooperative Interstate  
23 Shippers program and the Talmadge-Aiken program are  
24 insufficient, since they require state meat and  
25 poultry inspection programs to perform same-as

1 inspection, thereby negating the potential benefits of  
2 an inspection program tailored to small and very small  
3 establishments that can be obtained under an at least  
4 equal-to state meat and poultry inspection program.

5 FSIS should lift the prohibition on entry  
6 into interstate commerce for products from state-  
7 inspected establishments under the inspection of at  
8 least equal-to state meat and poultry inspection  
9 programs. Prohibition on these products entering  
10 international commerce should remain.

11 Question 6, are there any additional  
12 thoughts or recommendations you'd like to share?  
13 Current size classifications categorize meat and  
14 poultry businesses by their number of employees.  
15 There is a tremendous difference between an  
16 establishment with up to 499 employees and an  
17 establishment with 11 employees.

18 FSIS should reevaluate the entirety of their  
19 size classification system to better group similar  
20 establishments in size classification categories.  
21 Stakeholder input should be obtained throughout this  
22 process with an emphasis on small and very small  
23 establishments.

24 FSIS should evaluate the vast amount of  
25 information accessible through FSIS website to improve

1 ease of navigation and assist producers and  
2 prospective applicants with obtaining applicable  
3 information for a given topic in a clear, concise  
4 fashion. The current presentation of a tremendous  
5 amount of information is cumbersome and confusing.

6 FSIS should proactively engage with  
7 environmental regulatory agencies to ensure the  
8 proposed revisions to standards governing the  
9 discharge of wastewater from meat and poultry  
10 slaughter and processing establishments are not  
11 significantly detrimental to small and very small meat  
12 and poultry businesses.

13 FSIS should explore options to assist small  
14 and very small meat and poultry establishments in  
15 areas underserved by rendering resources. This may  
16 include options such as incentive programs or central  
17 collection points, but should seek to give underserved  
18 communities options on how to meet regulatory  
19 requirements for inedible disposal in a practical  
20 manner.

21 That's what we've got so far, and I need a  
22 drink of coffee.

23 MS. GALLIMORE: I think you did a really  
24 great job of summarizing everything we've done. And  
25 as someone that attempted to be in your position in

1 the past, for this committee, I feel your pain, and  
2 thank you for your service, in helping us these two  
3 days.

4 DR. DILLON: You're welcome. Thank you.

5 DR. BOURASSA: Yes, I also agree. Thank you  
6 for handling all of this. I want to make a little  
7 comment on the size description under number 6. If  
8 you can add just a few words saying something about  
9 how 499 and 11 are in the same category, you know,  
10 just to say --

11 DR. DILLON: Yeah, I think that's a great  
12 addition. So, there's a tremendous difference between  
13 an establishment with up to 499 employees and an  
14 establishment with up to 11 employees, but current  
15 classification definitions would label both of these  
16 types of establishments as small --

17 DR. BOURASSA: As small, yeah.

18 DR. DILLON: -- establishments.

19 DR. BOURASSA: Good, thanks.

20 DR. DILLON: Or maybe, should we say, would  
21 label or would classify?

22 DR. BOURASSA: Classify makes more sense.

23 DR. DILLON: Okay. Great. Thank you for  
24 that.

25 DR. BOURASSA: Thank you.

1 DR. WILLIAMS: I think you can drop the last  
2 word, establishments off too, James, just to cut down  
3 on words.

4 DR. DILLON: Oh, so would classify both of  
5 these types, maybe types of establishments as small?

6 DR. WILLIAMS: Period.

7 DR. DILLON: All right, got it.

8 DR. WILLIAMS: I too echo the appreciation  
9 for your volunteering of services. You've done an  
10 outstanding job, and I've had that before as well, on  
11 this committee, and it's not easy. Thank you.

12 DR. DILLON: Well, you all didn't really  
13 make it too hard. There was a, you know, great team  
14 effort both days here, and I think that's evidenced by  
15 the fact that we're on maybe inside the 1-yard line on  
16 this deal with a couple of hours to spare, or an hour  
17 plus to spare, I guess.

18 I suppose, if -- I'll give a minute for  
19 anybody else to bring up any other points that they'd  
20 like to make in here. But if we -- if there are none,  
21 should we, at this point, I guess, take a subcommittee  
22 vote on the document in total and, you know, should we  
23 reach consensus that we wouldn't need to break  
24 anything down any more, and we could consider  
25 ourselves ready to present?

1 MS. GALLIMORE: Sounds like a plan to me.

2 DR. WILLIAMS: So moved.

3 DR. KUBER: Sounds good.

4 MR. FILBRANDT: (Indiscernible).

5 DR. DILLON: All right. Having that been  
6 moved, and seconded, all in favor of accepting the  
7 current document as presented as the final product  
8 from the subcommittee say aye. Aye.

9 DR. BOURASSA: Aye.

10 DR. KUBER: Aye.

11 MS. GALLIMORE: Aye.

12 DR. ROGERS: Aye.

13 DR. WILLIAMS: Aye.

14 DR. DILLON: Opposed, say nay.

15 (No response.)

16 DR. DILLON: Hearing none opposed, the  
17 motion carries. I wasn't able to count the ayes, but  
18 I think we can safely assume that they prevail. So,  
19 and I would consider this to be a consensus document  
20 from the subcommittee. I think we are ready to  
21 present, unless anybody has anything else.

22 MS. MARRERO SANCHEZ: I like it. Thank you  
23 so much, everyone, for your work, and we really value  
24 your input.

25 So, your recommendations will need to be

1 submitted to us via email, and I have that email  
2 ready. Yeah, it's nacpmi@usda.gov, so I will ask you,  
3 Dr. Dillon, to send that to us when you are ready.  
4 And if you are all set with the recommendations, I  
5 believe we can just wait until we get back with the  
6 rest of the group at 2:25 for that session.

7 Be ready to share your screen as you did,  
8 and to present your recommendations too. We'll have  
9 30 minutes to do that, and then there will be a -- the  
10 other group will do a presentation as well. You'll  
11 have time to go over those, and you will all vote,  
12 towards 3:25 p.m.

13 And I'm not sure, Katrina, so should we take  
14 a longer break now, and then reconvene at 2:25?

15 MS. GREEN: Yes. Can you hear me?

16 MS. MARRERO SANCHEZ: Yes, yes.

17 MS. GREEN: Okay. Yes. Everybody can take  
18 a long break.

19 MS. MARRERO SANCHEZ: Okay.

20 DR. DILLON: I think that, I think we --  
21 real quick, I think there is maybe one typo here, in  
22 this one, about the EIAO personnel. I think I used  
23 the word prospective right here, and maybe perspective  
24 should be the word.

25 DR. WILLIAMS: Yeah, perspective.

1 DR. KUBER: Yeah.

2 DR. WILLIAMS: Good catch.

3 DR. DILLON: I think there, as well.

4 DR. WILLIAMS: Angelica, would it be  
5 possible for someone to email the report to all of the  
6 subcommittee members, some type -- you know, as soon  
7 as you all have it in hand?

8 MS. MARRERO SANCHEZ: I will call Katrina,  
9 but as far as I know, this will also be publicly  
10 available. So it will be accessible through our  
11 website.

12 But Katrina, is that a possibility, that we  
13 can email the document to the committee members?

14 MS. GREEN: Yes, that's correct.

15 MS. MARRERO SANCHEZ: Okay.

16 DR. WILLIAMS: I know it will be publicly  
17 available, but that's usually some time later.

18 MS. MARRERO SANCHEZ: Okay. We can --

19 MS. GREEN: Right.

20 MS. MARRERO SANCHEZ: We can email that.

21 DR. DILLON: And what was the email address  
22 I should send the document to again?

23 MS. MARRERO SANCHEZ: It's nacpmi@usda.gov.  
24 I put it in the chat, just in case.

25 DR. DILLON: All right. I'll get that sent



1 over, everybody.

2 MS. MARRERO SANCHEZ: Great, great,

3 DR. KUBER: So we'll reconvene in an hour?

4 MS. MARRERO SANCHEZ: Yeah, about an hour.

5 2:25 is --

6 MS. GREEN: 2:25.

7 DR. KUBER: Yeah. I'm over on the West  
8 Coast, so I'm just trying to do the calculations. I'm  
9 looking at my clock, I'm like yeah, it's --

10 MS. MARRERO SANCHEZ: The next hour.

11 DR. KUBER: Yeah, like an hour. That's --  
12 yeah.

13 MS. MARRERO SANCHEZ: (Indiscernible) to the  
14 next hour.

15 DR. KUBER: Perfect.

16 MS. GREEN: That's why those calculations  
17 right now.

18 MS. MARRERO SANCHEZ: Yeah. Grab some  
19 coffee and stretch, and we'll see you --

20 DR. KUBER: Because it's showing, it's 10:31  
21 now, so yeah, then 11:25 my time. Okay. Sounds good.

22 MS. MARRERO SANCHEZ: You have the whole day  
23 ahead of you.

24 DR. KUBER: Well, a part of the day.

25 MS. MARRERO SANCHEZ: All right, thank you

1 all. See you soon.

2 COURT REPORTER: All right, this is Tim  
3 Atkinson. I'm taking us off the record.

4 (Whereupon, at 1:31 p.m., the subcommittee  
5 meeting was 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 A  
OUTREACH TO PROSPECTIVE APPLICANTS  
FOR FSIS INSPECTION

Via Webex

June 22, 2023

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.



TIMOTHY J. ATKINSON, JR., Reporter  
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