

National Advisory Committee on Meat and Poultry Inspection
June 21-22, 2023

Subcommittee II: Assistance to Current Businesses

CHARGES: FSIS requested input from the Committee on ways to enhance outreach and engagement efforts to promote equity for new and existing establishments in underserved communities, while strengthening the food supply chain and ensuring compliance with food safety regulations. FSIS asked Subcommittee II to provide recommendations on assistance to businesses currently under FSIS inspection.

Question 1: What barriers significantly inhibit small and very small regulated establishments from operating successfully under FSIS inspection?

The Subcommittee discussed several behavioral, cultural, educational, financial, geographical, infrastructural, linguistic, technological, and other barriers faced by small and very small establishments. The consensus was that these operators get overwhelmed by the burden of implementation of 9 CFR 416, 9 CFR 417 and many other regulations.

Specific barriers:

1. Facilities in states where state inspectors can do inspections on behalf of the federal government (Talmadge-Aiken and Cooperative Interstate Shipping Program) face additional communication challenges with FSIS.
2. High turnover in the food industry as well as a lack of qualified workforce.
3. Information in guidance documents is not in a format digestible by many small and very small operators.
4. Lack of inspection personnel training on risk-based food safety assessments.
5. Lack of training resources and technical assistance in languages other than English, overlooking African, Asian, Eastern European, and Hispanic/Latino worker training needs.
6. Low literacy levels of plant owners and workers hinder training effectiveness.
7. The regulatory burden is disproportionately large on small and very small plants.
8. Training is time-consuming and often away from the plant, making it difficult for establishments to send people off.

Recommendations to FSIS:

1. Develop guidance for industry on product disposition when a potential deviation has occurred. This is in response to the financial burden imposed by having to discard products that may otherwise be used in alternative applications.
2. Expand guidance to industry on how to develop and maintain SSOP and HACCP documentation due to the lack of food safety management system expertise of small and very small facilities that may not have resources to hire a consultant or a full-time staff member.
3. Identify inspection personnel training needs to communicate more effectively with establishments management and personnel to increase trust and maintain a positive working relationship.
4. Improve the way that FSIS disseminates new versions of guidance documents, notices, and directives so that processors are aware in a timely fashion.
5. Promote practical applications of HACCP training. Currently, this is a two-day course delivered in a very passive way. The content needs to be reconciled with the reality of the small and very small establishments, considering ethnic and cultural backgrounds.
6. Streamline communication, collaboration, and partnerships between establishments and FSIS regional offices to reduce time and financial costs of appeals and other processes.

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Question 2: What are the most critical kinds of information that would help make small and very small establishments in underserved communities more successful?

The Subcommittee discussed several aspects of information type and access that would help small and very small facilities increase compliance with federal food safety regulations in a more effective way. The Subcommittee agreed that creating a positive, mature food safety culture is not a one-size-fits-all, and that the FSIS inspector should be part of the development of such culture. However, there are instances of power structure dynamics between many inspectors and their assigned facilities that may hinder effective communication, the development of trust, and the implementation of risk-based food safety and other controls, which ultimately have an effect on public health. The Subcommittee's consensus is that FSIS needs to provide further support with documentation and implementation of food safety regulations.

Specific kinds of information:

1. Cooperative Extension factsheets and guides
2. Guidance documents
3. Pathogen modeling programs
4. Peer-reviewed scientific papers
5. Social media posts
6. Blogs, white papers, and graphical information from commodity boards

Recommendations to FSIS:

1. Design and administer a needs assessment survey of managers and non-managers to better identify preferred training content and delivery methods that are adaptable to the work schedules and time constraints faced by small and very small operations.
2. Design practical training materials in the form of case studies, videos, infographics, etc. that can be combined in a training toolkit for establishments, including training on how to use available resources like the pathogen modeling program.
3. Develop specific and culturally sensitive training resources for underserved communities such as Amish and tribal nations.
4. Improve communication and increase collaborative outreach between processors and federal inspectors and their regional district offices.
5. Increase practical training experience for inspection personnel on food safety, humane handling, and other topics.
6. Provide resources to industry in various formats and languages to consider equitable access to resources (rural areas, non-native English speakers, various literacy levels, etc.)
7. Provide training for FSIS personnel on diversity, equity, and inclusion as well as microaggressions and cultural sensitivity to better work with the ethnic and cultural reality of the meat and poultry workforce.

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Question 3: How can FSIS more effectively promote awareness and use of current valid scientific information in support of small and very small establishments' food safety systems?

The Subcommittee discussed the many resources that already exist and agreed that there is a significant amount of technical information that processors can use. The Subcommittee's consensus is that FSIS has done a good job at creating guidance documents and materials for industry. However, most of this information is in English and may not be in a format that small and very small facilities can digest and use. Additionally, scientific publications and white papers from commodity boards may not be free-of-charge, thus decreasing access.

Specific ways to promote awareness and use of information:

1. Expand collaborations with Cooperative Extension, community colleges, and other technical schools at a local level.
2. Create peer-to-peer support networks.
3. Increase social media presence in dynamic formats.
4. Conduct webinars on how to use guidance documents, notices, etc.

Recommendations to FSIS:

1. Establish a central repository of updated HACCP validation resources which can serve as a searchable database for processors to find relevant technical information.
 - a. Work with Cooperative Extension and State HACCP Leads to disseminate this database and to help processors identify the resources and technical information that best suits their product and process.
 - b. Work with other groups such as the NIST Manufacturing Extension Partnership Network to provide combined OSHA and food safety training.
2. Develop and maintain technical resources in bite-size formats accessible by small plants to tackle very specific regulatory requirements, such as verification testing.

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Question 4: What organizations are most effective at providing assistance to small and very small establishments and what can FSIS learn from these organizations to enhance its own efforts to assist small and very small establishments?

The Subcommittee identified several sources of technical information. Some are more targeted to meat and poultry processors. Some are more on the consumer food safety spectrum. Many of these organizations have resources only for their members, posing a financial barrier for small and very small businesses to access timely and relevant information.

Organizations:

- Cooperative Extension Services
- Professional societies: American Meat Science Association, Poultry Science Association, etc.
- Industry-driven commodity groups – North American Meat Institute, National Association of Meat Processors, Southwest Meat Association, National Chicken Council, National Turkey Federation, US Poultry and Egg Association, National Pork Producers Council, Refrigerated Foods Association, Niche Meat Processors Assistance Network, and many more.
- Grass-root organizations, including NGO, the Flower Hill Institute, consumer groups, and community-based organizations.
- The Partnership for Food Safety Education
- Alliance to Stop Foodborne Illness

Recommendations to FSIS:

- Develop and/or enhance partnerships/MOU with the organizations listed above and many others in a transparent way that increases access to information by small and very small establishments.
- Develop materials based on storytelling, clear real-life examples, and explanatory of the why, thus enforcing food safety culture.
- Promote collaborative food safety culture avoiding regulatory action when opportunities for risk-based training and support exist.
- Build capacity to further expand and support the work of the AskFSIS and the Small Plant Help Desk.
 - Better integrate these resources.
 - Increase funding and staffing for reduced response time.
 - Separate education and training from regulatory compliance.

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Question 5: What concrete actions can FSIS take, alone or in partnership with other stakeholder organizations, to more effectively aid existing small and very small FSIS regulated establishments in underserved communities?

The Subcommittee discussed various specific actions that FSIS can take to more effectively support regulatory compliance of small and very small establishments. Trust and transparency were mentioned several times during the discussion. Some members of the Subcommittee felt strongly that there is a culture of fear of the FSIS inspection process due to inherent power dynamics that may hinder processors seeking federal inspection or successfully remaining under federal inspection.

Concrete actions:

1. Unify/standardize the food safety messages in training for inspectors and training for processors. This will reduce confusion, clarify expectations, and facilitate conversations between industry and FSIS inspection personnel.
2. Facilitate and expand regional listening sessions, town halls, and summits to better integrate the small and very small industry with the FSIS mission and message and streamline communication with regulators.
3. Create a quarterly newsletter that can be distributed to the IPP who can then report directly to the regulated facilities during their weekly meeting and inform of regulatory updates, webinars, new resources, etc.
4. Immediate action is recommended to improve the capacity of the Small Plant Help Desk to provide support to facilities in a timely fashion.

Question 6: Are there any additional thoughts or recommendations you'd like to share?

Final comments from the Subcommittee revolved around equity aspects of regulatory compliance and federal inspection, for example, inequalities in FSIS overtime policies that put additional financial burden on small and very small facilities, especially in rural America.

1. Explore ways to reduce the burden of testing carried by small and very small establishments by leveraging FSIS testing results to support the company's food safety management systems.
2. Incentivize the presence of inspectors and workers in rural and disadvantaged areas of the United States.
3. Reduce the financial burden of inspection on small and very small plants by reviewing overtime charges recognizing the lower volume of production of these facilities and the challenges with splitting charges between operations.
4. Enforce regulations in a more consistent and equitable way across all FSIS districts.