

*Preparing Small and Very Small Meat and Poultry Establishments
for the Future of HACCP: A Cooperative Approach*

Group II: New Regulations/Directives/Notices: Informing the Industry

Availability of New Information

1. How do you find out about new Regulations/Directives/Notices?

Key Points noted in discussion:

- E-mail notifications from FSIS
- AAMP notifications
- Inspectors and weekly exit meetings
- AMI, FSIS e-mail systems
- Other associations
- Meat and Poultry Daily News
- FSIS website

2. How did you find out about: the Listeria regulation? The E. coli O157:H7 directives? BSE?

Key Points noted in discussion:

- As above (question 1 response), e-mail, AAMP(must join, only with membership), industry trade journals (a lot free, but some have to subscribe)
- Regional sessions, USDA invites plants to 1-day sessions

3. Review web site resources with computer. Are you aware of these? Do you use them? Why or why not?

Ask FSIS

Small Plant News, newsletter

Location of notices, directives, etc.

**Industry resources (such as the AAMP [American Association of Meat Processors],
NAMP [North American Meat Processors] or GMA [Grocery Manufacturers
Association] or (AMI) American Meat Institute**

Key Points noted in discussion:

It is more complicated to navigate FSIS website then before – although some thought it had gotten a little better recently. It is generally difficult to find things. Which directive addresses what issue? There is no subject index. How do you know? Titles tell you more than numbers. Perhaps they should be cross-listed as title of directive OR directive number or possibly there should be cross-referencing number and titles. About half the room had trouble navigating the FSIS website as it is now.

Additional points of discussion:

- We took a vote – only 3 participants were aware of all resources stated. 10 were aware of some.
- One person in the room gave the group some information in regard to numbering and subject – 7000 series was processing, 6000 series was slaughter and 5000 series was everything else.

4. How would you most like to receive information about new regulations, directives, policies, etc.?

Key Points noted in discussion:

It would be helpful to have a Q and A with all directives to take the guesswork out of the interpretation. Recorded telephone notices depending on area and clientele – particularly if facility with no e-mail or Internet service. Recording, daily, on a phone service that processor can call to get updated information quickly.

A large problem is the use of technology across the industry. This is a cultural and technical problem. Some industry folks have not problems adapting to technology, others to. Small processors may not have computers or may be in an area where access is not available (rural VT, OH). Basic directives should be on paper as well for these folks.

Additional points of discussion:

- Would like information from USDA compiled as a resource list
- Inspector in charge could be the source of this information. Industry relies on the inspector to bring information that only pertains to the facility and processor e.g. beef OR poultry. Use the weekly meetings to discuss relevant directives/notices/guidance.
- E-mail notifications are good but have to go to a link and “dig” into it. Would be nice to have a headline with subject matter to know whether it pertains to the processor or not.
- Web forums were mentioned – discussion groups that are accessible to all.
- Inspector giving updates via telephone perhaps – top three changes.
- Companies should be able to pick which ways to get information.
- New newsletter – small plant news. Good vehicle to indicate new directives, etc. Mailed to every establishment part of the plant based inspection system (PBIS). Do you have to sign up? Does everyone just get this mailing?

In this group, the following additional discussion took place.

There was discussion here about how individuals here were committed to food safety; but concerns about small operators that are exempt. Regular plant personnel are concerned with small plant producers such as these. Participants thought another meeting should address these exempt processors – these are state issues. There is an emerging class of value-added farmers and producers looking into direct sales. So even if exempt, if someone gets sick, all meat and poultry processors take the “hit”. Are the custom exempt people getting the information? Is FSIS working with the states and outreach to educate this group? They may not be getting FSIS documents, but are they getting trade journals? Do they care? These people must be brought into the discussion. This was a HIGH INTENSITY discussion.

Compliance Assistance

5. *What do you think makes it more difficult for small plants to comply with new directives, regulations or the HACCP rule than for large plants?*

Key Points noted in discussion:

It is difficult to comply with new directives because information does not get to processors in a timely fashion. There is too long a time lag between the publishing/institution of directives/regulations and the printing of compliance guidelines for the industry.

Compliance may be further hampered by interpretation problems. For example, Notice 6507 on E.coli – interpretation for testing – everyone says something different!!

A Q and A for each new directive should be published in layman's terms. Interpretive summary is needed since small plants rely on compliance guidelines more than large plants. If guidelines not well written or adequate supporting documentation – trouble for small plants vs. large ones that can do own studies.

Additional points of discussion:

- Do small plants have harder time complying? YES. Small plants need outside help versus larger plants. Larger plants with in-house services; therefore small plants do not get results as fast.
- Resources, cost and understanding – “you vs. inspectors” interpretation is problematic.
- Some intimidation. No “point” person that is educated to appeal. These people are found in large plants. Small 5-10 person plants, difficult. Maybe not intimidation so much but having the resources and expertise and time to appeal.
- Maybe we should re-define “small plant”. True small plants have fewer numbers – the definition may be too high.

6. *Tell us what you know and what you think about the FSIS Small plant Contact/Coordinator program.*

Key Points noted in discussion:

Generally plant personnel do not know about this program. About 5 people in the group were aware. Perhaps use the newsletter to inform industry about state contacts and alert inspection personnel about the program.

7. *Are you familiar with FSIS Compliance Guides?* **(go to:**

http://www.fsis.usda.gov/Regulations_&_Policies/Compliance_Guides_Index/index.asp)

Are they useful?

Do operators need more information?

What type of information do operators need?

Key Points noted in discussion:

Again, there is a lag time between compliance and regulatory. Guides are useful only if they come out in a timely manner. Regulations are issued and then directives are

issued, but compliance documents do not follow in a timely manner. Directives and compliance should come out at the same time.

How these items are interpreted by each inspector can be problematic. Industry should communicate with inspector; but each inspector may interpret things differently. Must have something – Q and A – that is in layman's terms.

Additional points of discussion:

- General familiarly with the guides – use is split within industry.
- If they do have them, they have been given to them by the inspectors. Most do not know that the website exists.
- More information is needed. But only send directive/compliance to those that need it – need based only.

8. Where can small plant operators go for more assistance to help them comply with new directives/regulations?

Key Points noted in discussion:

AskFSIS (via web). Not specifically listed. Very new. Return answering time is very slow since answers are in writing – timeframe depends on issue. The Tech center, which many gave up on long ago, does not really exist anymore. Gave up on it since “experts” gave different answers – depended when you called and who you got (inconsistent answers). But tech center not really answering any more. AskFSIS has taken over the roll. Questions are being channeled through AskFSIS. People answering are now part of the policy office. But again the answers are not timely unless question is already listed and answered. Problems are:

- While written (good, used for documentation), takes too long
- Must reveal yourself – cannot ask question anonymously since you have to sign up
- Must have internet access to use

Additional points of discussion:

Assistance also comes from

- Industry groups – usually charge a % of sales to belong – big cost so not good for small companies. AAMP is better for small companies (still a cost), but others can cost thousands.
- Trade magazines
- USDA Inspectors
- Extension services
- Industry helping each other – every region may be different as to answers to questions regarding products. Supposed to be the same but is not.
- Internet – google
- International HACCP Alliance
- Sanitizer suppliers or other suppliers

9. Are Land Grant universities/Extension programs providing information and compliance assistance in your state? If yes, what?

Key Points noted in discussion:

States represented in this group that could use this service – VT, ME, NJ, IN, OH, PA, SC) and mostly said yes. A variety of assistance was provided by different programs:

- Supporting documentation

- Sanitation practices
- Sampling techniques
- Training opportunities (this appeared to be the most)
- Validation studies
- Provide information – like a library. Lending videos etc.
- Material development
- How to set up a lab in a plant
- Web page development

10. Are industry associations or consultants providing information and compliance assistance? If yes, what

Key Points noted in discussion:

- Pay for it – some expensive, some cost effective
- Wealth of information via industry associations like AAMP.
- Process authority – some discussion as to what this really means. Can industry be its own process authority? It depends.
- Best management practices
- Education materials
- Some called association often – interpretation and confirmation of guidelines
- Workshop/trainings
- Information at trade shows

Training

11. Are there sufficient opportunities for training when new regulations/directives/notices are administered? Are there regional differences?

12. Have you ever attended a regulatory education workshop or participated in a regulatory education web seminar? If yes, were they effective/worth your time/useful?

13. Would you be interested in providing/receiving training beyond basic HACCP (perhaps in response to new rules or notices and their compliance guidelines)?

Key Points noted in discussion:

- Participating trainers first answered – Yes and No for opportunities for training. Some stated have more opportunities to participate in training than others—it depends on the resources available to them: time or facilities.
- Industry not always showing up to USDA-sponsored workshops. However, these are regionalized anyway – too few. Who could really go?
- If training is not required, many will not go – no time. If industry folks can do this by themselves and take care of this, then will do it. Since original training, so much new stuff – but still don't go.
- South Carolina – regionalizes training and goes out to industry.
- Small plants and very small plants can't send people out as often.
- Use conventions to disseminate information or offer training.
- There are some opportunities for training via individual help from inspectors.

- Split as to whether have opportunities – depends on state. However, even if they had the opportunity, time and money issues – don't take advantage
- FSIS had training via website (e.g. webinars), but what about those without Internet access????
- Generally when went to regulatory workshops, did not find value. Workshops had a mixed response from the group. Not many attended regulatory workshops.
- May be interested in beyond HACCP – trainers have limited resources. Must be timely with training.

14. In what form would you like to receive this training? (workshop, web or internet based, mail course)

Key Points noted in discussion:

Participants want self-directed training – Internet or Interactive CD-ROM or DVD. Small plants lack resources to send people to training. However, if training were closer and more convenient, it would at least be easier to consider.

Additional points of discussion:

- Those who attended webinars found them generally good – well worth it. Sign up and get e-mail with link at prescribed times
- No interest in mail course
- Web/Internet
- CD
- Internet based class – call in and use computer so can ask questions over phone or type or send. Power Point presentation on the computer. Small plant outreach.
- AFDO – free on line course for retail meat and poultry – could be a place
- Workshops – constraints due to time and personnel
- Seminars – selective
- Workshops – hard to replace human interaction

15. What are the barriers that keep small plant personnel from participating in additional training opportunities?

Key Points noted in discussion:

Time, resources etc. All said before.

16. Would you consider participating in (or offering, if you are at trainer) a training session for any of these topics?

Key Points noted in discussion:

We took a vote. Need depends on the operation.

- | | |
|---------------------------------|-----------------------|
| ▪ Sanitation (in depth) | 7 participants |
| ▪ Good Manufacturing Practices | 5 |
| ▪ BSE | 4 |
| ▪ <i>Listeria</i> control | 5 |
| ▪ <i>E. coli</i> O157:H7 | 7 |
| ▪ Traceback/tracking systems | 4 |
| ▪ Training your employees | 3 |

- Food plant defense/bioterrorism issues 2
- Crisis management/recalls 5
- **New guidance and/or regulations 8**
- **Verification/validation (added this one) 7**

17. Is there anything else you would like to share regarding how we can be informed about new FSIS rules/directives/notices/etc.?

Key Points noted in discussion:

- Participants talked about an ombudsman position in the agency. Those that wanted one found out that there was one!! The availability of the ombudsman is actually listed somewhere on the FSIS website – no cost, but not timely.
- Plants can contact regional FSIS offices. This process exists. Part of appeal process. This process is effective.
- Want to get answers to questions quickly. Struggle to get a simple yes or no answer because a name (FSIS person) may be affiliated with an answer. Ask FSIS may be of some help.
- Interpretation issues
- Just in time meetings – not enough notice
- On-site training done in big cities – not easily accessible.