

## UNITED STATES DEPARTMENT OF AGRICULTURE

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## NATIONAL ADVISORY COMMITTEE ON

## MEAT AND POULTRY INSPECTION

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## SUBCOMMITTEE 1

## ISSUE 1: VEAL VERIFICATION

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January 16, 2013  
1:12 p.m.

Patriots Plaza III  
355 E Street, S.W.  
Washington, D.C.

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DR. BARBARA MASTERS

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

2 (1:12 p.m.)

3 MS. WILLIAMS: So I think we're all pretty  
4 much getting situated here. Once I get everyone's  
5 attention, I'll start.

6 Okay, so we're going to go ahead and start.  
7 Just a brief introduction, of course.

8 My name is Natasha Williams, as Keith Payne  
9 told you before.

10 I'm sure everyone by now knows where the  
11 restrooms are and the break room.

12 We do want to remind you to keep your cell  
13 phones on mute or silent, just so we don't have any  
14 interruptions.

15 Water, if you guys need any more water,  
16 things like that, we have that in the back, so I can  
17 easily get that for you.

18 As far as ground rules for this Committee,  
19 this Committee is the committee for veal  
20 verification. We do have three subject matter  
21 experts in the building, so you'll have Janet McGinn  
22 and remind me?

1 MS. KREMER: Selena Kremer.

2 MS. WILLIAMS: Selena Kremer and Bill Shaw  
3 will be your subject matter experts. So if you guys  
4 have a question on the topic, you can refer to them  
5 and they will give you answers. They are not to  
6 guide you. All of this is up to you, as far as what  
7 the Committee is deciding, your suggestions and  
8 recommendations. As Keith Payne mentioned before, we  
9 will need a written report prior to 4:15, so when I  
10 see time starting to escape us, I will give you guys  
11 a reminder and we can go from there.

12 As I had mentioned previously, just some  
13 ground rules. We want to make sure everyone has the  
14 opportunity to speak and be heard. We are having  
15 our court reporter here, so if you are ready to make  
16 a comment, of course, as we've been doing before,  
17 just raise your name tag, you know, I'll call on  
18 you, and let's do our best to respect the other  
19 speaker and not to interrupt them.

20 And I think that that's about it. So if  
21 you guys have any questions for me before we start?

22 (No response.)

1 MS. WILLIAMS: No? Everyone good?

2 Janet? Oh, of course. Yes, yeah. And  
3 also your mikes. They're on mute, but you can turn  
4 those up, of course, as you need to speak.

5 UNIDENTIFIED SPEAKER: Turn them all on so  
6 we can have a conversation instead of a formal  
7 discussion.

8 MS. WILLIAMS: Pat, can you turn on your  
9 mike so she can hear you? Okay. Can you guys come  
10 to the table? They wouldn't want a less formal --  
11 yeah.

12 (Discussion off-microphone)

13 MS. WILLIAMS: Okay, so I guess originally  
14 we had said to leave all the mikes on, but that's  
15 causing some issues for the court reporter, so if  
16 you just turn on your mike when you're speaking,  
17 that would be great.

18 (Comment off-microphone)

19 UNIDENTIFIED SPEAKER: We can all hear each  
20 other without mikes. That would be --

21 MS. WILLIAMS: I think that she'll need to  
22 hear on the speaker. I apologize for that.

1 UNIDENTIFIED SPEAKER: Okay.

2 MS. WILLIAMS: Okay, so I think we can go  
3 ahead and begin.

4 MS. KREMER: I'm Selena Kremer. I'm with  
5 the Office of Policy and Risk, Innovations  
6 Management Division here at FSIS.

7 MS. MCGINN: I'm Janet McGinn. I'm also  
8 with the Office of Policy and Risk, Innovations  
9 Management Division.

10 DR. HARRIS: Joe Harris with Southwest Meat  
11 Association.

12 DR. STIFFLER: Dennis Stiffler, Mountain  
13 States Rosen. We're a veal packer and processor, as  
14 well as lamb, with operations in New York and  
15 Colorado. And we have a joint venture with a  
16 slaughter processor out of Pennsylvania.

17 MR. GOLTRY: Hello, I'm Scott Goltry with  
18 the American Meat Institute.

19 MR. WALDROP: Chris Waldrop, Consumer  
20 Federation and member of the Committee.

21 MS. BUCK: Pat Buck, Center for Foodborne  
22 Illness Research & Prevention, and a member of the

1 Committee.

2 MR. WINCHESTER: Leonard Winchester, King  
3 County Public Health, member of the Committee.

4 MR. WARSHAWER: Steven Warshawer, Mesa Top  
5 Farm in New Mexico and member of the Committee.

6 MR. DANTZLER: Kevin Dantzler, Catelli  
7 Brothers Veal and Lamb out of New Jersey.

8 DR. MASTERS: Barb Masters. I'm currently  
9 with OFW Law and I had 18 years with the Food Safety  
10 and Inspection Service.

11 DR. RYBOLT: Michael Rybolt, Hillshire  
12 Brands and a member of the Committee.

13 DR. SHULTZ: Craig Shultz, Pennsylvania  
14 Department of Agriculture and a member of the  
15 Committee.

16 DR. LORENZEN: Carol Lorenzen, University  
17 of Missouri and member of the Committee.

18 MS. WILLIAMS: Okay, at this time we'd like  
19 you to select a chair for your subcommittee.

20 MS. BUCK: I would like to nominate Craig  
21 Shultz as our chair.

22 DR. LORENZEN: I second the nomination.

1 MS. WILLIAMS: Any opposed?

2 MR. WALDROP: I heard a phrase the other  
3 day, guided democracy.

4 UNIDENTIFIED SPEAKER: Chris told them to  
5 do it.

6 (Laughter.)

7 MS. WILLIAMS: Craig, is that okay? Okay.

8 For the record, Dr. Craig Shultz will be  
9 the Committee chair.

10 DR. SHULTZ: First, I have to learn how to  
11 use the mike.

12 Now that that's accomplished, well, unless  
13 there are objections or unless there are preliminary  
14 statements that someone would like to make, I think  
15 we could simply go through the questions, refer to  
16 our Agency and industry experts, as necessary, and  
17 attempt to come up with some responses. I think  
18 it's a very interesting topic with a lot at stake.

19 So with that said, the first question is:  
20 What improvements can be made to the existing  
21 sanitary dressing verification procedures, --  
22 Directive 6410.1 -- to address unique aspects of

1 veal slaughter and processing?

- 2           • Are there instructions that do not apply to  
3           veal slaughter establishments?
- 4           • Are there instructions that need to be  
5           added to address unique aspects of veal  
6           slaughter and processing?
- 7           • Should the frequency of sanitary dressing  
8           verification be different for veal as  
9           compared with beef?

10           My initial comment would be perhaps we may  
11 need to preface this with taking a look at the  
12 various components of the veal industry, because I  
13 think there are some specific differences. I'm not  
14 sure that we can make a one size fits all  
15 determination about formula-fed veal and bob veal.  
16 I think there are some unique risks associated with  
17 each and that may be a concern. Any comments?

18           MR. WARSHAWER: Are we supposed to -- we  
19 never had them before.

20           MS. WILLIAMS: Well, just for the court  
21 reporter.

22           MR. WARSHAWER: Okay.

1 MS. WILLIAMS: It's just to state your name  
2 and -- so that she can record it.

3 MR. WARSHAWER: If she can record it. I'm  
4 just a little confused about precedence because in  
5 the last -- we did our committee meetings without  
6 that structure of court reporting and without this  
7 kind of dialog and it's pretty time consuming to add  
8 that. We have a lot to talk about in a limited  
9 period of time, so how are we to balance --

10 MS. WILLIAMS: If you would just state your  
11 name and the company that you're with prior to  
12 comment, then I think that you don't have to worry  
13 about it.

14 MR. WARSHAWER: So are both committees now  
15 -- subcommittees, we're all being recorded and --

16 MS. WILLIAMS: Yes.

17 MR. WARSHAWER: Okay. So that's a change  
18 in our process. Thank you.

19 MS. BUCK: Subcommittees have always been  
20 recorded.

21 MR. WARSHAWER: Okay, sorry. Steve  
22 Warshawer.

1 I think before -- the questions you're  
2 raising, Mr. Chair, are prior questions to these and  
3 it seems like there is a range of questions that  
4 were illuminated by the presentation, which if we  
5 don't explore them first, we probably won't do  
6 justice to these questions that are specifically  
7 raised to us.

8 And I mean some of us, talking during  
9 lunch, came up with not a systematic grouping of  
10 questions, but certainly a bunch of things we were  
11 interested in and industry folks that are here can  
12 probably help us.

13 DR. SHULTZ: I agree. Further comment?

14 MR. WARSHAWER: So if that works for you,  
15 my suggestion would be before we engage the  
16 questions as they're delivered to us that we have a  
17 little bit more just open exploratory conversation  
18 where we understand the industry side of veal  
19 production to complement the information that we've  
20 gotten from this data capture.

21 DR. SHULTZ: Comments from industry?

22 DR. STIFFLER: Just background, because it

1 is a specialized industry in a specialized product  
2 and there is a great deal of variability in the  
3 rearing practices, feed and feed components, and  
4 then as they focused on the age at harvest, so it is  
5 -- and it's a very small industry, somewhere between  
6 5-7,000 head of the special-fed, fancy-fed,  
7 whichever term you want to use, veal slaughtered a  
8 week.

9           So it's a very -- against, you know,  
10 600,000 head of beef and 2.5 million head of hogs  
11 and 37,000 head of sheep, so it is a small industry.  
12 And we, Mountain States Rosen, we only deal in  
13 fancy-fed, so I'm not capable of addressing the bob  
14 situation. I do agree with the earlier comment made  
15 in the general session about a little difference in  
16 the immune suppress systems and some of the things  
17 that are associated with that, so there are some  
18 issues there.

19           We slaughter at one facility, transport  
20 carcasses to another facility, and there is where --  
21 all of the testing, breaking down fabrication,  
22 branding operation. We've used intervention systems

1 for years where we do robust testing at both trim  
2 and final products. And we have an extremely good  
3 track record of positives compared to the numbers  
4 that are being presented in this data.

5           The only other thing I would say about the  
6 data, per se, is part of it, when you've only got  
7 that small a sample size, your divisor drives part  
8 of that statistic component of that, so as we gather  
9 more data and get more samples on it, that will  
10 level out some.

11           We also, as an industry, have come together  
12 and we're under a baseline risk assessment  
13 ourselves, grouped together, being conducted by IEH,  
14 Dr. Kamari. And we got the preliminary data that  
15 we're meeting in February to review that, as an  
16 industry, again taking very much the same approach  
17 that beef took 15, 20 years ago, in that food safety  
18 is not a competitive advantage of something that  
19 industry has to take charge of and something that we  
20 have to address because it's a real issue. A  
21 positive is a positive.

22           MR. GOLTRY: Scott Goltry, AMI.

1           Regarding this first question -- and I  
2 agree with what Dennis says. You know, the veal  
3 industry is a small industry compared to the other  
4 industries. However, I would like to point to a  
5 couple of things that a prominent law firm here in  
6 town that represents a lot of the beef companies, as  
7 well as AMI, has, I think -- law firm first made a  
8 formal request to the industry that split out the  
9 veal data from the beef data.

10           Before that was done, there was no way that  
11 the veal group could know that they had a potential  
12 issue. Once they found that out, they have come  
13 together to take a proactive intervention step  
14 similar to what Dennis was talking about, at some of  
15 the meetings that we've had.

16           However, regarding FSIS Directive 6410.1,  
17 the OIG report that was released, probably in the  
18 last year or so, they discussed 6410.1 NR as not  
19 being related to any kind of food safety issue.  
20 That directive has since been changed and I think  
21 this is the chain of that directive, and I would  
22 question that we need to understand if there's

1 anything in 6410.1 Revision 1 that really relates to  
2 food safety issues.

3           Because I think we can sit here all day  
4 long and say we need to change this, we need to  
5 change this, but until you get that data to say does  
6 it really relate to a food safety issue, we're just  
7 collecting points in time.

8           MR. WALDROP:       Christopher Waldrop from  
9 Consumer Federation.

10           At a curve and emphasize starting splitting  
11 the data out. I mean, you said the Agency or the --

12           MR. GOLTRY:       The last time that we -- the  
13 report that's now posted was December 31st, I think,  
14 year to date. We've had some, I think, in our  
15 monthly meetings with FSIS, I think maybe September,  
16 August, somewhere like that, we had just some, I  
17 guess, just data presented to us, you know, like  
18 here's the amount of 0157 positives, here's how many  
19 of them were veal, that kind of thing. But there  
20 wasn't any kind of formal presentation on the  
21 website.

22           And now, I think, December -- well, it's in

1 the packet. I think December 31st, year end,  
2 December was the first time that they accumulated  
3 all that data and it was put out.

4 MR. WALDROP: And then the other question I  
5 had was -- FSIS also seemed to indicate that there  
6 were kind of frequent or continual problems with  
7 slaughter, so they were puncturing, you know, they  
8 were -- or puncturing the neck. Those seem to be,  
9 like, things that FSIS was seeing on a regular basis  
10 throughout the industry. Can you speak to that a  
11 little?

12 DR. STIFFLER: And again, I think, from our  
13 perspective, we'll harvest somewhere in the  
14 neighborhood of a thousand head a week. We had, at  
15 least from the tracking through FSIS, had issues in  
16 that arena at ours, but I would say that it's mostly  
17 the fact if there's sampling and that's going  
18 through those 32 facilities, that there has to be  
19 really small ones because there are only about five  
20 of us that handle in volume. And so there are a lot  
21 of small facilities in there, so I think it could be  
22 addressed to a lot of those situations.

1           You know, training, fully understanding  
2 sanitary dress procedures, understanding how a  
3 system can get overloaded if certain things aren't  
4 met. And so I'm not sure who they sampled or -- we  
5 had a question kind of about that, but there's, you  
6 know -- and I can't relate to the bob side of it at  
7 all. I've never harvested a bob calf; I can't  
8 relate to that at all in terms of their incidences  
9 to those kinds of things. Maybe there are some  
10 people here that can, but I just can't. They're  
11 pretty small animals, so knife work and things that  
12 just become that much more complicated.

13           DR. SHULTZ: Based on your experience and  
14 the good track record that your company has  
15 maintained, can you look at your experience and  
16 share with this committee what you see as the keys  
17 to pathogen reduction? I think the industry would  
18 look, perhaps, at sanitary dressing procedures and  
19 zero tolerance and say how much has -- can this  
20 benefit us compared to other things we do?

21           And I think that's been, sort of, a point  
22 of difference between the regulatory approach, and

1 we heard it this morning, in terms of trying to  
2 relate what we do in plants and what we document in  
3 plants compared to the pathogen reduction results  
4 that we get. So if it's not entirely about  
5 procedural FSIS regulatory procedural activities in  
6 the plant, what are those things that we need to  
7 focus or place our regulatory focus on?

8 MR. GOLTRY: Scott Goltry, AMI.

9 Dr. Shultz, since you've come out of the  
10 slaughter operation, cow slaughter operation, and  
11 I've spent probably all my career in process meats  
12 and steer and heifer slaughter, you know, I think  
13 the things that we measure are probably no different  
14 on a steer heifer operation than on a veal  
15 operation. But how you get there, I think, is key.

16 I think there's been a lot of -- over time,  
17 seems like every summer something new changed, you  
18 know, for the last -- you know, especially from 2000  
19 to 2009. And I think, on the veal side, those  
20 issues are the same, you know, hide removal, zero  
21 tolerance, effectiveness of interventions, those  
22 things are where your contamination is going to be.

1           So I think on 6410.1, in general, the  
2 topics are probably the correct topics, but they may  
3 need to be fine tuned a little bit. And I think the  
4 other thing that drove 6410.1 is I think there was  
5 some industry work collaboration with the steer and  
6 heifer groups to come up with some dressing  
7 procedure practices. And I don't think we're going  
8 to come around here today and come up with 10 magic  
9 bullets that are going to say this is what things  
10 need to be done. So I would maybe look at, over  
11 time, how the steer and heifer has improved and what  
12 they were using to guide some of those improvements.

13           DR. STIFFLER:     Dennis Stiffler, Mountain  
14 State --

15           MS. WILLIAMS:     State your name for the  
16 record.

17           DR. STIFFLER:     I would just echo what Scott  
18 indicated. The same fundamentals: facility, you've  
19 got to have a facility that can accommodate the  
20 animals. When they come in, they need to be  
21 cleaned. The procedures that you go through need to  
22 be those fundamental best practices that we know

1 exist regardless of the size of the animal; they're  
2 still fundamental. And you do need to have  
3 intervention enough to make sure that when you have  
4 event days or you've overloaded the system, there's  
5 enough there to bring that back, that process, set  
6 of processes, under control, and then you have to  
7 look at your data. And it seemed to be that was one  
8 of things mentioned and that may just be the small  
9 plant mentality.

10 We do follow those data and we look for,  
11 you know, warning signs and tolerance levels and  
12 action levels, so those are the things that require  
13 training, identifying definitive processes, whether  
14 it be two knives and a sterilizer, so you have  
15 enough time to let it do its thing, making sure that  
16 you are not cross-contaminating, understanding cuts,  
17 flaps, and folds as you go through your intervention  
18 processes, same fundamentals, and that's where you  
19 get effective de-microbed biological  
20 decontamination.

21 MR. GOLTRY: Scott Goltry, again with AMI.  
22 We kind of feed this thing up as a veal

1 industry issue, but I guess I would like to know is  
2 some more data on -- there were 32 plants that  
3 slaughter and I would like to know, is it truly a  
4 veal industry issue or are these positives? And I  
5 think the question's been asked.

6           Were these positives from a few numbers of  
7 plants, were they a few number of verification  
8 positives that then they went back in and did the  
9 follow-up samples and all those follow-up samples  
10 from those three or four positives?

11           So if I could ask that question, Craig? I  
12 know it's your Committee, but I think that would be  
13 an interesting question.

14           DR. SHULTZ: I agree. Could we get that  
15 information?

16           MS. MCGINN: This is Janet McGinn with  
17 FSIS.

18           We did, in response to that question --  
19 Bill Shaw mentioned, kind of, a gap we had in our  
20 sampling program in which we don't sample slaughter  
21 establishments that ship out carcasses and we  
22 understand that that's a common practice within the

1 veal industry system, so they don't produce beef  
2 manufacturing trimmings and so we don't have any  
3 sampling data.

4           And in fact, when you look at the 14 top  
5 producers in the veal industry, you know, currently,  
6 because of that limitation, we have sampling data  
7 for only 7 out of those 14. So that is a policy  
8 that we're going to have to put forward to address  
9 that situation. So we've sampled 7 out of the top  
10 14 and 4 of those establishments, 4 of the 7, had  
11 positive results.

12           And also, in response to an earlier  
13 question, that kind of was around how many  
14 establishments did we look at, we looked at 9 out of  
15 the top 14 and did see the themes of ineffective  
16 sanitary dressing procedures and ineffective  
17 application of their interventions.

18           And also, I'd just like to clarify one  
19 thing that, from this morning's discussion about, I  
20 believe Danah Vetter asked it, if looking at the  
21 sample results we saw that it was only the bobs or  
22 was there also an issue with the formula-fed; of

1 course, those are the two major slaughter classes  
2 that we're talking about when we're talking about  
3 veal. And actually, looking at the data, there's  
4 kind of a 50/50 split in the positives that we've  
5 gotten.

6 I mean, I would like to echo that again,  
7 our sampling program is not designed to really make  
8 statistically-based conclusions, but we are seeing  
9 that there is a marked difference in the set percent  
10 positive in veal products as compared with other raw  
11 beef products.

12 DR. MASTERS: Barb Masters.

13 I have some data that Dr. Esteban presented  
14 at the *E. coli* conference in Chicago that was put on  
15 by the National Meat Association and Southwest Meat  
16 Association. It may get at what the question that's  
17 being asked about whether some of this is size  
18 related and perhaps the small plants and the  
19 inability to control process.

20 And it's related to the MT60 program, which  
21 is the Agency's program for the original sample, not  
22 the follow-up samples, but the original sample

1 that's taken. And I think it's somewhat comparable  
2 to the chart that you have in your table, but  
3 probably just a different point in time just because  
4 FSIS presents at these conferences with the data  
5 that they have at that time.

6 But at that point in time, the Agency had  
7 for 0157, they had 12 positives. And out of those  
8 12 positives, 10 were for beef and 2 were for veal.

9 And the 10 in beef, there was 1 out of 647  
10 in the large category; 4 in the 679 in the small  
11 category; 7 out of 214 in the very small category;  
12 and they had 2 in the veal out of 22 samples, which  
13 there's no analysis to that, but it might suggest  
14 you might be seeing similar concerns in the small  
15 and very small categories.

16 For STEC, for the non-0157s, they had 14  
17 total positives in the original samples that were  
18 taken; 0 out of 647 for the large; 10 out of 679 for  
19 the small; and 4 out of 214 for the very small. So  
20 10 for beef and 3 out of 22 for the veal.

21 So out of the original samples, I think you  
22 can see that the findings might indicate that there

1 are similar issues that might be addressed in the  
2 small and the very small plants on the beef side.

3 And so I don't know if Janet might be able  
4 to indicate whether they've started to do some food  
5 safety assessments on the small and very small on  
6 beef and whether or not they've had similar findings  
7 on the beef side. But my general sense, my  
8 intuition, would be that we might see some similar  
9 findings on beef.

10 MS. MCGINN: Thanks, Barb. This is Janet  
11 McGinn with FSIS.

12 FSIS did do an analysis on its sampling  
13 data, kind of when we were looking at redesigning  
14 the beef manufacturing trim meats program and we did  
15 this last summer. You might have noticed the name  
16 change, MT50 to MT60.

17 And so that was based on kind of an  
18 analysis FSIS did where we looked at a number of  
19 factors, one of which was, is it a large, small, or  
20 very small plant? And the major drivers in that  
21 sampling, redesign work, production, volume, and  
22 allocating more samples during the high prevalence

1 season. But the other piece that was looked at was,  
2 to your point, the risk by production volume and it  
3 was that smaller production volume that you did  
4 point out. The various pathogen working groups do  
5 look at, you know, FSAs, for cause FSAs, at some  
6 frequency to see if there are policies that we need  
7 to address.

8           But, I mean, when you're talking about -- I  
9 would echo the challenges that small and very small  
10 establishments may have in identifying critical  
11 operating parameters and their scientific support  
12 documents. You know, there are some technical  
13 challenges that they have and also kind of  
14 translating that into their process, monitoring all  
15 of the key parameters that would really impact the  
16 intervention's effectiveness. So we do recognize  
17 there are challenges there.

18           DR. SHULTZ:       So from a regulatory  
19 standpoint, should there be a focus on plant size  
20 and if so, how could FSIS accomplish that without  
21 discriminating against a portion of the industry?

22           MS. MCGINN:      You know, recognizing, kind

1 of, some of the technical challenges that the small  
2 and very small plants have, I mean, FSIS, in  
3 developing our compliance guidance, we do really  
4 want to provide information that targets the small  
5 and very small plants. And we know that we could  
6 improve the focus on the small and very small plants  
7 with our 2002 guidance.

8           You know, a lot of our documents, even  
9 though we do want to reach, kind of, all segments of  
10 the industry, we do need improvements to the small  
11 and very small plants.

12           So I would say that whatever  
13 recommendations the Committee can offer, I mean, we  
14 want to improve the documents and make them more  
15 relevant and usable to our stakeholders, so we're  
16 welcoming any specific feedback you would have.

17           DR. SHULTZ: Well, I guess this goes  
18 without saying, but certainly from -- kind of going  
19 from federal regulation to state regulation, I've  
20 become keenly aware of the issues that we had in  
21 trying to educate and enforce, to whatever level is  
22 necessary, very, very small establishments because

1 they do not have the resources to respond to a  
2 regulatory situation in the same manner that larger  
3 establishments have. That is a challenge.

4           So it's very easy, even at the state level,  
5 to basically eliminate an entire segment of your  
6 industry with a regulatory policy that works very  
7 well for another segment, but doesn't work well for  
8 small industry.

9           I think we all recognize that we have to  
10 come up with the means to enforce. However, with  
11 that, that enforcement can't simply eliminate major  
12 portions of an industry. And I think that's a  
13 challenge that we are faced with here and I think  
14 that's part of this reality of this compliance  
15 situation.

16           MS. BUCK: I think you're absolutely right.

17           This is Pat Buck with CFI.

18           And I just was wondering I've heard a lot  
19 about money being available in the beef industry.  
20 Is there some way to develop some kind of  
21 public/private partnership that would give  
22 incentives and help-assistance resources? Do any of

1 my industry people have any ideas on that?

2 MR. GOLTRY: Scott Goltry, AMI.

3 I was talking with some of the professors  
4 that are in the state universities and have this  
5 large \$27 million -- I think that's the amount --  
6 CAP grant. Most of you are probably aware of that.  
7 And I'm not as familiar with it as some of you or  
8 Dr. Booren on our staff, but I think there is some  
9 education money that's available in there and I  
10 think that may be a place to do some of these more  
11 modern kind of education through DVDs and things  
12 like that.

13 And going back, I was just thinking about  
14 it, to when HACCP was first rolled out, you know, it  
15 was kind of this partnering thing, you know, the  
16 people that had already, because it was ramped up  
17 over a 2- or 3-year period, I think, something like  
18 that.

19 You know, some of the people that have gone  
20 through it were asked to share their experiences  
21 with some of the people that were just getting in.  
22 And there may be something regarding some of those

1 system program things that are applied in the large  
2 plants that can apply to small plants.  
3 Interventions may not be total, but the idea of  
4 coverage, you know, some of the things like that  
5 would be a possibility.

6 MR. WALDROP: I just want to be clear that  
7 I think regulations -- and I think we want the  
8 regulations to be applied across the board. But  
9 then the compliance guidelines and the education and  
10 those sorts of things could help the small and the  
11 very small plants meet those regulations. But I  
12 don't think we want to write separate regulations  
13 for small and very small plants.

14 DR. MASTERS: This is Barb Masters.

15 And I think you're really spending some  
16 valuable time on Question 3 and 5, and that was my  
17 rationale for pointing out that we need to not only  
18 look at veal but also the small plants, is because I  
19 think it's a segment of the industry that could  
20 value from your conversations. And I think it would  
21 be important to make sure that they value from the  
22 work that you're doing because I think they can

1 benefit from the discussion of this group.

2 DR. HARRIS: Joe Harris from Southwest Beef  
3 Association.

4 I've worked quite a lot with a lot of small  
5 and very small establishments, and following with  
6 Chris, with your comments, I couldn't agree more. I  
7 do think that, as an industry and as an agency, we  
8 need to rethink how we provide guidance to small and  
9 very small plants. We'll joke about I didn't have  
10 time to write you a short letter, so I wrote you a  
11 long one instead.

12 Guidance documents coming from regulatory  
13 agencies tend to overwhelm an establishment operator  
14 who is the owner, he's the chief sales guy, he's the  
15 QA manager and everything else, and yet he gets this  
16 very useful 150-page compliance guideline that he  
17 never even gets time to read. We need to find a way  
18 to boil these things down into very concise, easy to  
19 follow documents.

20 Some of the recent compliance guidelines  
21 are wonderful, I think they're a huge step forward,  
22 and yet they're still 150 pages long and we need to

1 find a way to say this stuff in a way that will fit  
2 on the front and back of a piece of paper, almost,  
3 in some cases. And I do think that we need to work  
4 both together as an industry and as a regulatory  
5 agency to find a way to do that communication,  
6 again, whether that's for the small veal  
7 establishments or the small beef establishments,  
8 either one.

9 MS. BUCK: This is Pat Buck.

10 I would agree with you. I think  
11 communication, in particular, if we can use visuals,  
12 would be very much a step in the right direction and  
13 I think -- you know, I'd love to boil-plate things  
14 down to one or two pages, but there are an awful lot  
15 of times you cannot bring it down to one or two  
16 pages. That's why I think you can maybe bring it  
17 down to five or six pages and have your video or  
18 some other mechanism.

19 I did have a question, though, for FSIS.  
20 One thing that wasn't clear to me this morning, we  
21 talked about the high percentage of positives in  
22 veal, but one thing wasn't really clear to me: How

1 widespread is the distribution?

2           We have it concentrated, evidently, on the  
3 two coasts where they're manufactured and I'm sure  
4 it's sent all over the country, but I'm also sure  
5 some of it is exported. I mean, what are we talking  
6 about as far as the distribution of this product, do  
7 you know? Do you guys know?

8           DR. STIFFLER: It is concentrated. The  
9 East Coast is, by far, the largest consumer followed  
10 by California and Great Lakes, so they're the three  
11 prime, but there is growing consumption in the  
12 Southeast and there's a little bit of it sprinkles  
13 out; the export side of veal is pretty small. There  
14 is some, but it's a very small part of it.

15           And I think it's been pointed out a little  
16 earlier, the grind side of veal has just really been  
17 merging over, say, the last 6 to 8 years compared to  
18 -- the trim just, you know, went to either meatball  
19 makers and things like that, bridging out and  
20 starting to get up to seasoned burgers and expansion  
21 of that, but the general preparation that was  
22 mentioned by Dr. Shultz earlier, for veal, is much

1 different than ground beef. They put it in sauces,  
2 made into meatballs, and it's generally overcooked.

3 And to my knowledge, there hasn't been any  
4 link with any of the pathogen illnesses to a veal  
5 product through all of this time of testing and  
6 again, they go through the process of identifying  
7 sources that have not been implicated, to my  
8 knowledge.

9 MS. WILLIAMS: Mr. Steve Warshawer?

10 MR. WARSHAWER: Steve Warshawer.

11 I'm interested in how the conversation is  
12 moving because it seems that our conversation was  
13 seeded with some teasers, for example, that method  
14 of production might be a contributor.

15 And we're also getting information that the  
16 categories small and very small are not enough, is  
17 what I'm interpreting you say, because you're  
18 describing the largest, but the category is so big  
19 that the largest and almost all the smallest fit in  
20 the same category. And then I think about my own  
21 experience with young calves and with very small  
22 operations in New Mexico, the size of the animal.

1 These are the teasers that were thrown out to us.

2           And then we were told frequency of sanitary  
3 dressing verification or effectiveness. But what  
4 I'm hearing you all say is if everybody just did  
5 what they're supposed to do, we wouldn't have these  
6 problems. But what I'm hearing is that the beef  
7 requirements work; if there are problems that we're  
8 seeing in veal, they're analogous to problems we  
9 would be seeing in beef if we looked at them the  
10 same way.

11           And there's no problem with that if that's  
12 what we're learning, but that's different than the  
13 seeding of the conversation, which seems to be  
14 implying that we need to differentiate between bob  
15 veal and fancy-fed and heavy calves and we may need  
16 a more a complex set of regulatory expectations.  
17 I'm hopeful that we don't and that the information  
18 that you are giving us would move us more in that  
19 direction, so -- but we're going to need a lot more  
20 data, right?

21           That's the main thing that's missing,  
22 information was put forward based on very

1 preliminary data in order to make a final  
2 determination that it is actually simpler than we  
3 thought and is fundamentally a training and  
4 implementation problem. We're going to need more  
5 data to verify that.

6 So what I'm hearing is cart before the  
7 horse; if we follow the seeded conversation, we  
8 would be creating structures and interventions at a  
9 regulatory level that may not be needed. So Number  
10 1, we need a lot more data.

11 Number 2, you guys need to help us define  
12 the categories with which we pursue and acquire that  
13 data, and then we need to review how that data might  
14 influence regulatory shifting on the one side. But  
15 all throughout, we need to concentrate on training  
16 and we need to concentrate on a mechanism to assure  
17 that plants, regardless of size, are able to attain  
18 the regulatory requirements, whatever they are.

19 MR. WALDROP: However, it also sounded  
20 like, to me, from the earlier conversation, that  
21 FSIS inspectors weren't necessarily thinking about  
22 veal as being different than beef and so this 6410.1

1 is for sanitary dressing operations of -- and it's  
2 not specific to veal and it sounds like that may be  
3 an issue where inspectors or even plants aren't  
4 reading that as we have to also do these things in  
5 veal.

6           So there may be an opportunity there to  
7 take, to maybe create an addendum that's veal  
8 specific, so that inspectors understand that when  
9 they're doing these procedures, they need to think  
10 in terms of veal. That's just a suggestion, that's  
11 --

12           DR. SHULTZ:     Chris, that would be an  
13 addendum to what?

14           MR. WALDROP:    An addendum to the 6410.

15           DR. SHULTZ:    Okay.

16           MR. WALDROP:    Just to sort of pull out the  
17 veal-specific -- if there are veal-specific issues,  
18 pull it out --

19           MR. WARSHAWER:   This is Steve Warshawer  
20 again.

21           I don't disagree with you. My concern with  
22 that is if we differentiate veal, why don't we then

1 differentiate bob veal from fancy-fed veal from  
2 young calf? If we're going to start writing  
3 specified addenda, there needs to be a reason for  
4 it. What I got from that was we have a training  
5 problem with our inspectors. Not a problem, but  
6 we've got a gap.

7           So if the inspectors -- just as we're  
8 saying if the operators had the capacity to follow  
9 the regulations, then we wouldn't have a problem, we  
10 could also say that if the inspectors were  
11 sensitized to how those regulations apply to all  
12 veal, then those same regulations and same  
13 inspection protocols would work.

14           So part of why I raised this question about  
15 breaking things down into more and more pieces is  
16 once you start, where do you stop? And so the  
17 important question to me is well, why aren't  
18 inspectors recognizing that veal are cattle and that  
19 the rules that apply to cattle also apply to veal?  
20 That is, to me, another training and an internal  
21 kind of FSIS issue that could be addressed that way  
22 rather than creating more stuff to keep track of.

1           MR. WALDROP: It may be a training issue,  
2 but we may not emphasize that -- it may be a  
3 training issue. It may be the way the regulation  
4 states the directives -- they're taking a directive,  
5 they're not implementing it that way -- because they  
6 don't understand the differences that -- I think  
7 that's an open question.

8           MS. MCGINN: This is Janet McGinn from  
9 FSIS.

10           While we were going around and talking to  
11 various field personnel, we did find that there was  
12 a misunderstanding that the beef policies that we  
13 have in place do apply to veal, so we did, kind of,  
14 in the draft notice, provide them information on  
15 some of the deficiencies we've seen in veal  
16 slaughter operations.

17           We do, kind of, try to highlight that point  
18 because we did find that that was not something that  
19 they understood, that the beef policies do apply to  
20 veal.

21           MR. WINCHESTER: Leonard Winchester, King  
22 County Public Health.

1           I agree. Dr. Shultz sort of mentioned that  
2 was -- brought that up, too, saying that the  
3 application of all cattle also included veal. And I  
4 think if you look at Question 1, we can almost say  
5 that that's a directive where we probably need to go  
6 to make sure people understand this does apply to  
7 veal.

8           And then if we look forward, as to the  
9 draft that's out there, on the increased  
10 verification and inspection specifically for veal,  
11 that's probably where our next step is, is what's in  
12 this?

13           So we have this hey, directive here for all  
14 cattle, which, of course, by the way, does include  
15 veal. And then we go to the next draft that's being  
16 proposed, saying well, because we may not have  
17 identified specific things in here about veal, we  
18 now identified them here and helped give you some  
19 very good descriptions with photos and everything so  
20 that you and the -- what I assume are everybody in  
21 veal production, based on what I hear, is in a small  
22 plant production and/or a very small, so even to

1 your case about you're referring to those other  
2 small plants, I think you are a small plant and so  
3 therefore we have small plant and very small plant  
4 production.

5           And I think, hopefully, this new increased  
6 -- you know, draft increased look-at specific to  
7 veal, maybe that's where you can help those very  
8 small plants that are the one person who's doing  
9 everything say oh yeah, this is what they're trying  
10 to say and this is what I need to be doing; I  
11 shouldn't use that same knife to be doing cut A, B,  
12 and C, but I'm the only one doing it, so who's here  
13 to say that it's not correct?

14           And by helping to identify that up front,  
15 that these are the problems associated by doing that  
16 step or procedure you, yourself -- owner, operator,  
17 killer, slaughterer, distributor -- that that's a  
18 problem and we can help you address that by these  
19 simple steps, and here are some very clear  
20 picture/guideline support that the in-plant  
21 personnel staff can actually help support that, too,  
22 when they're there.

1           So anyway, I would just almost want to say  
2 that if we can -- not to move forward here, but  
3 Question 1 is sort of already answered and if we --  
4 not directly answered, but I feel that it's already  
5 been identified as a yeah, people weren't  
6 recognizing it, and then if we look forward to what  
7 2 and 3 are and start moving with these questions,  
8 I'm not sure we're going to get a true answer very  
9 quickly here anywhere.

10           But I would almost look in the draft and  
11 say, you know, what kind of input do you need on  
12 this draft and/or where is the draft currently in  
13 the process to help out with those facilities?

14           DR. SHULTZ: So, would the committee agree  
15 -- This is Craig Shultz.

16           Would the committee agree that -- are we in  
17 agreement that the basic principles of sanitary  
18 dressing -- intervention apply to veal equally as  
19 they apply to beef and that because those principles  
20 are in place, that then we need to recognize whether  
21 it is entirely a situation of regulatory application  
22 or deficiencies in regulatory application? Or is it

1 a combination of that and some unique  
2 characteristics of the sub-class, recognizing that  
3 we have the basic operating parameters to achieve a  
4 reasonable level of safety? Any objection to that?

5 MS. BUCK: No, I don't have an objection to  
6 that.

7 MR. WARSHAWER: Dr. Shultz, the short  
8 version of that would be that we don't see a need  
9 for different regulatory requirements for veal than  
10 for all beef. Based on the current information, we  
11 don't see a need for different regulatory  
12 requirements for veal than for all beef.

13 MR. WINCHESTER: Leonard Winchester.

14 I think that what we're saying is that the  
15 directive that's currently out there, cattle of any  
16 age, does apply to veal, but that we recognize there  
17 are problems specific to veal in these small and  
18 very small plants and that we may need some  
19 additional guidance and direction.

20 Not that the regulation is different, but  
21 that we have some very specific or supporting  
22 documentation or guidance that become another

1 guidance -- directive, I guess is the correct term  
2 for you guys -- another directive that helps assist  
3 those plants and those facilities. I guess I'm sure  
4 that's where you were at, that that's where I see it  
5 going.

6 MS. BUCK: And I would add that you would  
7 want to have, in the guidance or in the regulation  
8 or something, a mention of the fact that we need to  
9 look at communicating new ways to the small and very  
10 small plants and that that needs to be fleshed out  
11 so that we can provide them with the types of  
12 communication that would be most effective to them  
13 because Skip -- is that right?

14 MR. STIFFLER: Dennis.

15 MS. BUCK: Dennis. Dennis is right. I  
16 mean, nobody is going to be able to sit down and  
17 read a 500-page compliance guidance when they are  
18 the jack of all trades.

19 DR. SHULTZ: Chris?

20 MR. WALDROP: On this point, I'd like to  
21 ask FSIS its own questions that you've posed to us.  
22 In Question 1, should the frequency of sanitary

1 dressing verification be different for veal as  
2 compared to beef? And I would suggest maybe you  
3 need to make some different considerations for veal.  
4 Do you have concerns, other issues, with the  
5 frequency of verification or sanitary dressing that  
6 you want the inspectors to perform? Please contact  
7 us with the reasons why that question is relative.

8 MS. MCGINN: Well, let's reverse, kind of,  
9 issues with sanitary dressing on -- you know, the  
10 draft notice kind of lays out the increased  
11 frequency of verification for 90 days. For them, we  
12 really kind of focused on inspection and  
13 verification, focusing on the issue and also helping  
14 the veal industry to recognize that that was  
15 creating a problem with that, address it within 90  
16 days.

17 So the draft notice kind of lays out an  
18 increased frequency, and the routine frequency in  
19 the sanitary dressing is once every other week. And  
20 so the question is, you know, so we're proposing the  
21 90 days to do this increased frequency in veal  
22 slaughter establishments, is the routine frequency

1 laid out in the sanitary dressing directive of once  
2 every other week, is that adequate for veal  
3 slaughter operations or do we need to consider a  
4 different frequency for verifying sanitary dressing  
5 in veal slaughter operations?

6 MR. WALDROP: Is that the standard --

7 MS. MCGINN: It is, but -- yeah. Because  
8 the directive applies to veal slaughter  
9 establishments, it should be routinely done every  
10 other week.

11 And of course, given other considerations,  
12 for example, through the STEC positives, you know,  
13 and other information, they suggest -- process  
14 control. You know, they can certainly increase it  
15 as the situation suggests. But the routine is the  
16 same.

17 MR. WALDROP: I think it's -- the Agency  
18 has done this in the past, where they do sort of --  
19 inspection, frequency for a period of time, because  
20 they're seeing a loss of process control across the  
21 industry. That focuses some energy both on the  
22 Agency side and the industry side to address that.

1 That seems like a reasonable approach. I can't,  
2 unfortunately, because I don't know enough to speak  
3 to the difference in the frequency for -- the  
4 routine frequency.

5 MS. BUCK: This is Pat Buck from CFI.

6 Would increasing the frequency of this type  
7 of testing give you data in other areas that would  
8 be useful in trying to make future determinations  
9 about what's going on in the veal industry? Was  
10 that part of your thinking?

11 MS. MCGINN: Yeah, I think that increased  
12 frequency seen if, you know, having the inspectors  
13 spend more time in observing the process and  
14 gathering information, you know, is there a  
15 difference in non-compliance rates? Kind of, are we  
16 seeing that establishments that had a history of  
17 positives, once this increase verification happens,  
18 or we're seeing a decrease in the positives? I  
19 mean, we're kind of wanting to assess the before and  
20 after picture.

21 MS. BUCK: Would this have a timeframe? In  
22 other words, when you put it in, are you going to

1 say for the next year, for the next 2 years, or is  
2 this going to be something that will be standard for  
3 the remainder of the period?

4 MS. MCGINN: That's kind of -- the draft  
5 notice talks about 90 days but, you know, we'll  
6 certainly look at the data. Also, if the Committee  
7 had any kind of ideas about whether a routine is  
8 enough, should we carry the increased verification  
9 forward, do we need something a little more  
10 frequently as every other week but maybe not as  
11 frequently as the notice? Those are, kind of, the  
12 questions.

13 MS. WILLIAMS: This is Natasha Williams.

14 I'd just like to remind the Committee that  
15 we are running short on time, so if you want to  
16 address the 2 and 3 -- so that we can move forward  
17 and wrap up Question 1.

18 DR. HARRIS: Joe Harris again.

19 So I want to ask a question relative to the  
20 verification frequency. Is it not possible that the  
21 verification frequency would be guided by the  
22 establishment's test results? An increased

1 frequency following a positive, for example, versus  
2 a baseline or base level normal frequency if there  
3 are no positives?

4 DR. SHULTZ: Is it the Committee's pleasure  
5 to agree that veal calves, as a slaughter class,  
6 are, in terms of STEC exposure for the carcass and  
7 STEC contamination are a higher risk slaughter  
8 class? And based on that, perhaps different  
9 frequencies, verification frequencies?

10 And there, again, we have to decide what  
11 the correlation will be in terms of whether this  
12 problem would be entirely solved by sanitary  
13 dressing procedures and zero tolerance and that  
14 approach, or whether we have to take a more  
15 sampling-based approach or a tighter sampling-based  
16 approach to monitor the problem.

17 MS. BUCK: This is Pat Buck.

18 And I tend to agree. We need to really  
19 identify whether or not veal is significantly a  
20 higher risk. And from the data that you've  
21 collected so far, it appears that way. But I think  
22 there's a great concern, at least on my part, that

1 you have not collected as much data as what we  
2 really would be comfortable with, to make a long  
3 statement that veal is totally off the charts as a  
4 high-risk product.

5           On the other hand, I think with animals  
6 that are as young as these animals, you have to  
7 really get to the core issue of why are these  
8 animals coming to the facility in different  
9 conditions?

10           Some of them are probably just very high  
11 shutters of certain pathogens and the reasons as to  
12 why that is a problem could be related to their  
13 environment or to the food that they're eating. And  
14 there are other issues that I'm not aware of, but I  
15 think it points very strongly, when you have a high  
16 risk product, that FSIS will need to engage in some  
17 research about the pre-harvest conditions.

18           And I think that needs to be justified  
19 because this is a product that you are selling  
20 across the United States and you have an obligation  
21 to pursue whatever you need to do to ensure that  
22 that product has as low a pathogenic contamination

1 as possible.

2 DR. SHULTZ: From a regulatory standpoint,  
3 though, I think -- and you can verify this or negate  
4 it, but I think we have limitations in terms of  
5 FSIS's reach of authority regarding pre-harvest  
6 conditions and we revisited that again and again.

7 MS. BUCK: I think you're right, but I  
8 think with veal and the evidence that's presented  
9 here to this committee; it shows that it is a high-  
10 risk product. Maybe other people could help me with  
11 this, but there might be a toe in the door to allow  
12 FSIS to look more strenuously at pre-harvest  
13 conditions with regard to veal.

14 MS. MCGINN: This is Janet McGinn with  
15 FSIS.

16 Just to follow up with that comment. Part  
17 of the reason when we were kind of looking at the  
18 data and kind of deciding, you know, would it be  
19 beneficial to make this information available for  
20 separate reporting for beef and veal?

21 And when we were deliberating about that,  
22 one of the drivers for that was presenting the data

1 to stimulate research into that area, to kind of  
2 drive that basic research that needs to be done to  
3 really get at the reasons, you know, as Dr. Shultz  
4 kind of alluded to. I mean, FSIS directly doesn't  
5 really fund research, but we do, you know, through  
6 making data available, kind of spur research into  
7 looking at why this is the case.

8 MR. WARSHAWER: Steve Warshawer.

9 I just have a couple of questions for  
10 industry folks. You all don't own the calves at the  
11 time they're born or are not directly involved in  
12 the rearing of them or are you?

13 DR. STIFFLER: No, we don't own the calves  
14 and we have contract growers that own the calves.  
15 We have a separate entity that supplies us calves.  
16 We strictly buy carcass veal and put it through our  
17 plant and that's the way our system works. There  
18 are, like, all of the industry, there are various  
19 different scenarios of how it's structured within  
20 organizations.

21 MR. WARSHAWER: Thanks. Given what Pat has  
22 said, we've got to find a way to break out of the

1 silo and source the problem and learn from sourcing  
2 the problem. And if it's not FSIS's job, we, as a  
3 committee, should ask FSIS to figure out whose job  
4 it is and find out how to collaborate in that work.

5           It would be dangerous to the industry to be  
6 told we're going to find a way to inspect them at  
7 the door and you either show us how you're going to  
8 turn them into safe food or you can't slaughter.  
9 That would be an irresponsible way to look at the  
10 production supply chain. It would be damaging to  
11 the processor and it would be damaging to their  
12 producers. And it wouldn't necessarily promote  
13 public health.

14           So even though it's outside our purview, as  
15 FSIS and as an advisory committee of FSIS, we need  
16 to respectfully ask that the question of  
17 classification of risk be approached in a way that  
18 looks beyond the boundaries of FSIS's authority, if  
19 necessary. We can't tell how to do it, but we need  
20 to -- I think we should be free to ask that; whether  
21 we get our way or not, a separate question.

22           And the other piece is the training piece.

1 We can't lose track of the training piece as we  
2 assemble our comments because thinking about this as  
3 a larger process, we want to keep it simple so it's  
4 administer-able and effective and trainable. And  
5 any layer of complexity that we add has to be  
6 justifiable from a public health outcome and from  
7 the ability of production and supply chain systems  
8 to answer. So just because we can't get FSIS to do  
9 all the research doesn't mean that research isn't  
10 essential to FSIS's mission.

11 MR. GOLTRY: Yes. One, first, I'd like to  
12 respond and follow up to what Dennis was talking  
13 about as far as the industry.

14 There are some groups that do own feed  
15 mills that feed these calves out. It's kind of  
16 interesting. I mean, it's somewhat integrated, but  
17 it's somewhat also more individualized.

18 I would question you, Pat, regarding the  
19 high-risk concern here. I think we've talked about,  
20 you know, based on what data we are seeing, there is  
21 a concern based on that data, but I think to go in  
22 and change regulation on such a small sample set may

1 be premature, but I think raising this issue to this  
2 group is very proactive.

3           Speaking of proactive, I can assure you  
4 that our veal members, which are probably a large  
5 majority of the large veal producers, are aware of  
6 this issue and they are responding to it.

7           DR. SHULTZ: So with all this background --  
8 Craig Shultz.

9           With all this background, I think we  
10 probably should start to generate some more language  
11 in response to these questions, so would anyone like  
12 to suggest anything as to how we would provide a  
13 written response?

14           I think we agree that, on Question 1, we  
15 feel that we have the basic tools in place. We  
16 don't see any need for revolutionary changes in the  
17 regulatory circuit that exists, correct?

18           MS. BUCK: This is Pat Buck.

19           The only thing I would again say is that we  
20 should have, in response to Question 1, that we will  
21 recommend to FSIS that they proceed with the  
22 increases in the sampling that they have suggested

1 in their draft, because I think until we have the  
2 more data, like Scott has just pointed out, we  
3 really won't know how high risk this product is. So  
4 we need to somehow collect more data.

5 DR. SHULTZ: Chris.

6 MR. WALDROP: Chris Waldrop.

7 Also, I would agree with your original  
8 statement, Craig, and then say that FSIS does need  
9 to make clear that this directive applies to veal,  
10 as well. So some way of making that very clear to  
11 inspectors that when they're looking at this, this  
12 is applicable to veal, also.

13 MR. WINCHESTER: Leonard Winchester.

14 There was a -- when you take the 6410  
15 directive, you know, just the first example I  
16 noticed was there, under the background information  
17 under Number 6, it talks about *E. coli* being found  
18 in beef manufacturing and trimming and ground beef  
19 and there again, I just -- this is the point where  
20 it's saying we're always referencing beef in this  
21 document. And it isn't until about six or seven  
22 pages in, that it actually mentions the word veal in

1 one section here.

2 Not to go through this whole article, but  
3 under Live Receiving and Holding there under Number  
4 6, one -- B6, it actually says, i.e. veal calves.  
5 It's the first time I actually see the word veal  
6 mentioned in this directive.

7 And then the other question alluding to is  
8 there stuff in here that doesn't apply to veal? And  
9 I'm not sure about the rodding and is it recent? I  
10 don't deal with veal slaughter. Does the veal  
11 production use a metal rod as described specifically  
12 in here or is veal being produced in a different  
13 way? And would that apply differently to the very  
14 young calf or the older calves?

15 So that would be a point where if you read  
16 this directive, I'm not sure if this occurs in veal  
17 slaughter production as it is referenced to all  
18 cattle, so that might be a point of saying hey, do  
19 you read the document and does that really apply?

20 Can somebody answer that for me?

21 MS. MCGINN: This is Janet McGinn with  
22 FSIS.

1           In the plants that we looked at, there  
2 would be a difference in what we saw in the bob veal  
3 and the formula-fed, in that the bob veal I would  
4 assume, because of their smaller size, that they  
5 were not rodded.

6           (Simultaneous speech.)

7           MS. MCGINN:    So that is the difference.  
8 That would be a good thing for us to, for example,  
9 call out.

10          MR. WINCHESTER:   Okay.   Leonard Winchester.

11          And that was my point of looking through  
12 this.   If we were to say specifically, are there  
13 things in here that don't apply to veal? this is an  
14 example of something in this directive that does not  
15 apply to veal and/or to bob veal, specifically, but  
16 I don't know about regular milk-fed or larger  
17 formula-fed veal.

18          Do you know, are they -- in veal  
19 production, are you guys following this method in  
20 the larger veal that you're producing?

21          DR. STIFFLER:    We do --

22          DR. LORENZEN:    Carol Lorenzen.

1           The one question that I had -- and this is  
2 my first time on the Committee, so I'm just trying  
3 to be quiet. It seems to me that a lot of dressing  
4 procedures are actually like lamb and what Dennis  
5 described as what you do in lamb. So can't we take  
6 some of the lamb procedures and drop them in here  
7 like -- the reason we do this in small calf, like  
8 use a -- rod in a larger animal?

9           DR. SHULTZ: So would the best way to  
10 approach this be with the directive addendum or  
11 would it be with inclusionary language within the  
12 text?

13           MR. WINCHESTER: Based on the question with  
14 a directive here coming out of 6410 saying, you  
15 know, are there aspects unique that -- you know, are  
16 there instructions that need to be addressed,  
17 address unique aspects of veal slaughter processing?  
18 This directive, yeah, I think that either we get it  
19 changed here or we further define it under the  
20 increased verification, saying oh and by the way, in  
21 this directive this really doesn't apply here.

22           I don't know how the best way to address

1 that, from maybe a regulatory standpoint from FSIS  
2 or from a plant production side, which would be a  
3 better way of having information presented to you.  
4 But somewhere a correction needs to be made or  
5 identified, I think.

6 DR. SHULTZ: So perhaps changing the  
7 directive so that there would be enough inclusionary  
8 language in it that FSIS in-plant personnel would  
9 have an awareness of the inclusion of veal in the  
10 process that this does apply to veal? Is that what  
11 might accomplish this?

12 MR. WINCHESTER: I think so, yeah. I think  
13 that's true. I think that very -- sorry.

14 I think yes, that's true. Very up front,  
15 there needs to be the inclusion of this and  
16 identifying this implies to veal. But then within  
17 that, what do you do with this one particular item,  
18 Number 7, that wouldn't necessarily apply to veal?  
19 Do we make a callout specifically something to that,  
20 more applicable, or do we just leave it alone and  
21 then the inspector group says oh well, there's extra  
22 stuff in here that doesn't even apply so then they

1 start passing it over?

2           And so you need to take it out here or  
3 address it here or do you go to the next one where  
4 you're talking about the increased verification?  
5 I'm not sure where the best place for this is. I  
6 think it needs to have some identification in a  
7 specific directive; some change needs to be made to  
8 call out this Number 7, specifically, that it may or  
9 may not apply.

10           DR. MASTERS: This is Barb Masters.

11           And what I might recommend, because rodding  
12 -- is a great example that may or may not apply,  
13 depending on the particular establishment. We know  
14 it does in some and it doesn't in others. My guess  
15 is FSIS, Janet's worked in -- she's worked in the  
16 field, and so I know she has this experience.

17           Recommending to that, that they go  
18 through this directive line by line and say they've  
19 done the FSAs, they probably could go through and  
20 find a lot of items and then use their own expertise  
21 to figure out the best way to sort through and  
22 figure out the best way to present it to their

1 inspectors, either by putting a band, whatever, but  
2 do the callout.

3 I love their new compliance guides where  
4 they've done the callouts on the side and it really  
5 is effective. They may have the expertise to do the  
6 callouts, but not to focus on one, but to go through  
7 the entire directive based on their nine preliminary  
8 -- my guess is they would find others that might be  
9 the plus/minuses because we wouldn't want to say  
10 it's an automatic yes/no because my guess is there's  
11 one plant out there that does it differently.

12 MR. WINCHESTER: Yeah, I would agree that  
13 -- I just brought up that one item because that's  
14 one that I could specifically see. But you're  
15 right, I think there needs to be a thorough reading  
16 and you know, sidebar direction on each of these  
17 items that would -- I guess from the Committee, I  
18 would take that back, saying that there are  
19 inspections here that don't apply. Yes, there are  
20 and maybe -- but we do see this as a good document  
21 for the entire cattle industry which includes veal,  
22 but leave it to FSIS to come up with a clarification

1 for some points that aren't specific.

2 MS. WILLIAMS: The time now is 2:30. Would  
3 the Committee like to take a quick break and come  
4 back and reconvene or do you want to press forward?

5 Keep going? The Committee chose to press  
6 forward.

7 DR. SHULTZ: What do we say? Quick break  
8 or keep going?

9 UNIDENTIFIED SPEAKER: No, keep going.

10 DR. SHULTZ: Keep going. Okay, keep going.

11 MR. WALDROP: Craig, I would just say that  
12 I agree with that suggestion. I would suggest,  
13 emphasize, that once they do that -- just take  
14 through what would make the most sense for  
15 inspectors as veal inspectors as they're reading  
16 this.

17 DR. SHULTZ: So something to the effect  
18 that the Committee recommends that FSIS revise the  
19 language of the directive to include veal industry  
20 specific information so that there is a greater  
21 awareness by in-plant inspection personnel?

22 UNIDENTIFIED SPEAKER 1: Yes.

1 UNIDENTIFIED SPEAKER 2: I don't think it  
2 -- make sure that it's included, so I would include  
3 it in --

4 DR. SHULTZ: Okay. Question: How do we  
5 capture Leonard's observation about the word beef,  
6 beef, beef, and then veal in --

7 UNIDENTIFIED SPEAKER 2: That would be part  
8 of FSIS --

9 DR. SHULTZ: That doesn't need to be -- in  
10 our Committee recommendations, that doesn't need to  
11 be called out specifically? I think it does.

12 MR. WINCHESTER: I think it should because  
13 -- that yeah, most of the documented records -- and  
14 at some point there needs to be a better --

15 DR. SHULTZ: Okay.

16 MR. WINCHESTER: And just as a future point  
17 -- sorry. I agree that what Steve is saying here,  
18 that there is enough in this document that we  
19 probably should identify in their review that they  
20 specifically look to call out or identify places  
21 where beef is very specifically identified and that  
22 it should either say all cattle or all meat or all

1 -- you know, all -- the words beef slaughter because  
2 it is beef slaughter, but it's beef, veal, and/or --  
3 including veal, maybe. Beef including veal as  
4 another terminology because that might be a way of  
5 trying to -- beef including veal. You hate to put  
6 that throughout the entire document, but that might  
7 be a point where it would clearly be spelled out.

8 DR. SHULTZ: Craig Shultz again.

9 Our response to that first question will be  
10 (1) that sanitary dressing procedures, pathogen  
11 reduction, and other approaches to controlling or to  
12 addressing the regulation of zero tolerance, we  
13 agree that what is currently available is  
14 sufficient.

15 Secondly, that in the revision of the  
16 document, there needs to be a greater reference to  
17 veal and that we recommend that the veal industry --  
18 that we have veal industry specific language and  
19 that through that we'll send a message to the in-  
20 plant personnel of this, the application of this  
21 document, to veal.

22 Is there anything else we need to say about

1 that first -- Pat?

2 MS. BUCK: Yes. We need to agree with FSIS  
3 that there should be an increase in the frequency of  
4 verification. And I don't know what that increase  
5 should look like, whether they want to just increase  
6 it for a narrow window of time, or if they want to  
7 increase it on their routine testing, but we need  
8 additional data on veal.

9 UNIDENTIFIED SPEAKER: So we want -- in a  
10 regulatory standpoint as well as --

11 MS. BUCK: Yes, I think so.

12 MR. WARSHAWER: I'm confused. That sounds  
13 a little different than what I heard earlier. I  
14 heard you all say that it makes sense, for a period  
15 of time, to up the frequency, verification  
16 frequency, in order to determine whether a change is  
17 needed in the routine frequency.

18 MS. BUCK: Well, I don't have enough  
19 information up here, in my head, about which would  
20 be the better way to go. I would think FSIS or  
21 maybe Scott or maybe one of the other meat people  
22 might have a better idea how to approach the

1 increase in data collection and sampling. Does  
2 anyone down there --

3 DR. RYBOLT: Pat, comment I have on this --  
4 this is Michael Rybolt -- is, you know, I get the  
5 increase, I guess for a little bit, and then once  
6 you get to baseline -- because we haven't been doing  
7 it, I guess, is what we found out, right?

8 MS. BUCK: Yes.

9 DR. RYBOLT: So you do an increase, but  
10 then at some point, you know, after a certain  
11 timeframe, you stop and then it kind of -- it goes  
12 back to what Joe suggested earlier, is it based on  
13 data from the establishment's testing or whatever?

14 And so it gets back to where the Agency has  
15 been trying to go anyway, is using their data to  
16 drive their inspection activities.

17 MS. BUCK: If that's the appropriate way to  
18 do it, then that would be acceptable to me. I just  
19 know that unless we have more data collected, we're  
20 not going to get a good handle on this situation.  
21 So I think that's definitely part of Question 1.

22 DR. SHULTZ: So our response to that would

1 be that we first increase frequency for the purpose  
2 of establishing a baseline. Once that baseline is  
3 established, that we reevaluate routine frequencies.

4 Scott?

5 MR. GOLTRY: Scott Goltry, AMI.

6 We need a technique to -- increase  
7 frequency -- plants are already tested --

8 DR. RYBOLT: The question, as I read it, is  
9 based on sanitary dressing verification.

10 MR. WALDROP: Increased frequency and  
11 sanitary dressing verification.

12 DR. RYBOLT: Yeah. So the question reads  
13 should frequency of the sanitary dressing  
14 verification be different for veal as compared to  
15 beef when we're talking about increasing here, you  
16 know, for a period of time for that? And then it  
17 would be based off of test results or whatever.

18 MR. WALDROP: Okay.

19 DR. MASTERS: This is Barb Masters.

20 And I think Joe's comment was if they got a  
21 positive sample, often the correlation has been the  
22 positive sample was often related to having sanitary

1 dressing problems, so that may be a trigger to that  
2 increase. Rather than doing it every other week, go  
3 back to doing it at an increased frequency to see if  
4 it was again related to sanitary dressing. So I  
5 think that was Joe's comment, it may be a trigger to  
6 keep it at the increased frequency.

7 MR. WINCHESTER: Leonard Winchester here.

8 I think the answer -- the first part is  
9 should the frequency of sanitary dressing be  
10 different for veal as compared to beef? I think the  
11 answer is essentially no, to begin with, no.

12 But I would move forward with the next  
13 question and you look at the veal verification, for  
14 increased verification for veal under the sanitary  
15 dressing verification, it actually talks very  
16 specifically this task would, if this was passed and  
17 moves forward, would be performed twice a week for  
18 the next 90 days. So we already are telling them in  
19 this next directive that goes specific to veal on  
20 how we want to increase the frequency and it's for a  
21 defined period of time. And so then they are going  
22 to be able to gather data.

1           But to answer the question, I don't think  
2 that we -- should the frequency on Number 1, the  
3 very last question, be different compared to beef?  
4 Essentially, no. There's no difference.

5           We're saying in the directive in this  
6 particular document, 6401 [sic], that that's the  
7 same. But as we move forward with veal and  
8 hopefully in the next couple of questions we're  
9 going to identify the problems which FSIS has  
10 already done in this draft and they put parameters  
11 to gather that data. And I think this is really  
12 good. You know, instead of once every other week,  
13 we're going to see it twice a week for the next 90  
14 days, and I think that's a good moving step forward  
15 in data collection.

16           So that's what I would say, to answer the  
17 question on 1, the last one, should there be a  
18 difference? Currently, no. We're okay with this.  
19 I, personally -- not we. I, personally, am okay  
20 with this.

21           DR. SHULTZ: Okay. I think that's --

22           MS. BUCK: That's great.

1 DR. SHULTZ: Should we move on to  
2 Question 2?

3 What improvements can be made to the draft  
4 notice on verifying veal slaughter sanitary dressing  
5 to address any additional unique aspects of veal  
6 slaughter and processing not currently in the  
7 document?

8 MR. WINCHESTER: Leonard Winchester here.

9 I read through this and the pictures aren't  
10 -- they're not the greatest pictures, personally,  
11 because I didn't have it in color, but I think a lot  
12 of things are captured here.

13 Not being in the veal industry, I would  
14 refer to industry. Have you read this draft? You  
15 don't have -- was this draft sent out or not or  
16 what? 1/7/13. I know they're not, but I didn't  
17 know if FSIS has sent this out anywhere yet or not  
18 or is it just -- was it released just to this  
19 Committee? Okay, sorry. That's what I wasn't sure.

20 MS. MCGINN: Yeah. And this is Janet  
21 McGinn.

22 You know, as Bill Shaw kind of alluded to

1 earlier, it's very far in the clearance process, so  
2 we would imagine that it will be released pretty  
3 soon for widespread -- but right now we wanted to  
4 take advantage of the Committee's feedback, so it's  
5 got draft written all over it, kind of, for your  
6 use.

7 MR. WINCHESTER: Okay, thank you.

8 MR. WALDROP: This is Chris Waldrop.

9 I would just affirm the use of pictures in  
10 this, that in terms of this communicating what are  
11 some of the issues -- visuals can often be very  
12 helpful. So in terms of this -- I would just  
13 support the use of those types of things.

14 MR. WINCHESTER: Leonard Winchester.

15 I would just like to add Janet because --  
16 have you and your staff, after reviewing this  
17 several times, I mean, this is your latest draft and  
18 you feel you've captured things? Or did you come  
19 back and say oh wow, we missed this, but how do we  
20 get it back in there and maybe we need this advisory  
21 committee to somehow know about that so that we can  
22 bring it forward? Do you have something that's been

1 missed that you've caught that you want to bring  
2 forward now?

3 MS. MCGINN: This is Janet McGinn with  
4 FSIS.

5 You know, having reviewed the number of  
6 plants, we think that we covered the major recurrent  
7 themes, but we did want to kind of use the  
8 Committee's review. If there's anything we missed,  
9 please, please let us know or if anything is off-  
10 target. But yeah, we feel pretty good about what we  
11 covered.

12 MS. BUCK: As a committee member who knows  
13 nothing about veal operations, I don't know how I  
14 can give you comments that would be useful. I would  
15 like to have an opportunity for those involved in  
16 the industry to give comments on this and have  
17 discussions with them. Just for future, I think  
18 that inviting members, on a specific topic like  
19 this, to serve on the Committee with us would be  
20 useful.

21 DR. SHULTZ: Scott?

22 MR. GOLTRY: Yeah. Thank you, Pat, because

1 those people here from industry -- we did not have  
2 to be here, so this document presented to a group  
3 that was asking industry -- but to present a  
4 directive like this without input from the veal  
5 industry -- I'm sorry.

6 I know you've been to what, 15 plants or  
7 something like that where you got this, but I think  
8 we could pull together a large group from the veal  
9 industry and get comments on this probably within  
10 60, 40 days. Or I don't know. We haven't seen it.  
11 I mean, it's rather lengthy.

12 DR. RYBOLT: So would a good recommendation  
13 be, for the Agency, then, for this is that -- I  
14 agree with you totally. I mean, I'm in industry,  
15 but I don't do veal, you know, so it's great to have  
16 you guys here to walk through that process. And I  
17 agree with Scott totally. I think it would be  
18 worthwhile to get the input from those individuals.

19 So, you know, would it be a worthwhile  
20 recommendation from this Committee to the Agency and  
21 they -- really shared directives and all that prior  
22 to publication, but this would be a great

1 opportunity considering the situation, you know,  
2 right now, for us to recommend that they get  
3 however, stakeholders to weigh in on it, right?

4 MS. BUCK: I agree. This is Pat Buck.

5 I would think that getting the input from  
6 key stakeholders, especially when you have a very  
7 specific topic like this, would be extremely  
8 important. And again, I would encourage including  
9 them as, I don't know, guest NACMPI members.

10 DR. MASTERS: Barb Masters.

11 I was just going to say well, FSIS has not  
12 necessarily shared directives from the perspective  
13 of asking industry to change the inspection  
14 directions. Sanitary dressing, you could probably  
15 carve off the sanitary dressing and the approach to  
16 sanitary dressing and, I believe, the Administrative  
17 Procedures Act would provide a means of inviting key  
18 veal processors.

19 And I think Phil could work with you on  
20 that, and carve off that section of it and not put,  
21 if there were concerns about the inspection  
22 directions, you could carve off -- since actually

1 it's getting to the industry processes. I believe  
2 you could look at the Administrative Procedures Act  
3 and not be in violation of the Administrative  
4 Procedures Act.

5 Because that's always been a concern on  
6 providing inspection directions to the industry for  
7 comments. And so I would suggest it might be a  
8 means, on this particular direction, to get guidance  
9 from the industry on that and --

10 MR. WALDROP: That was going to be my  
11 concern. I don't want to set a precedent for  
12 industry input on the directives, but if there are  
13 areas where industry input would be useful in  
14 sanitary dressing or whatever, you can figure out a  
15 mechanism. So you guys can give the input we need,  
16 then write the directive. I think that's  
17 appropriate. But I don't want industry input to  
18 sort of slow down the process of trying to get a  
19 directive out.

20 DR. SHULTZ: And then these would be  
21 guidelines that are associated with the directives  
22 rather than specific industry language?

1 DR. MASTERS: This is Barb Masters.

2 I wasn't necessarily suggesting carving off  
3 the two components to make them separate. I was  
4 trying to suggest, because I know the concern in the  
5 past from my experience with the Agency, of sharing  
6 information with the industry was that the  
7 Administrative Procedures Act precludes the industry  
8 from providing input to the Agency on the  
9 instructions to their own inspectors.

10 But because this directive specifically  
11 includes guidance on the process the industry is  
12 using, you can peel those sections of the directive  
13 off if you wanted to pull together -- and I know  
14 there are specific numbers and everything else, that  
15 the number of people that can come in to provide  
16 that input. I know Phil is the expert on the  
17 Administrative Procedures Act.

18 But because that unique part of the  
19 directive is unique to what the industry is doing,  
20 you wouldn't even have to hand over the part of the  
21 directive that tells the inspectors what to do and  
22 ask for input from the industry; that's the Agency's

1 guidance to their employees. But the section of  
2 this directive that deals uniquely and specifically  
3 with what the industry is doing, if you are looking  
4 for input from the industry, the best people to give  
5 you that input in combination with the folks that  
6 have been out in plants, would be the industry. And  
7 that would preclude you from violating the  
8 Administrative Procedures Act.

9 And so I was not suggesting separating  
10 parts of the directive, but a means for getting  
11 input from the industry without violating the  
12 Administrative Procedures Act.

13 DR. SHULTZ: Anything additional on  
14 Question 2?

15 MS. BUCK: This is Pat Buck.

16 And I don't know where it might be  
17 appropriate to put it in. Maybe Question 4 would be  
18 better.

19 I think the Committee should make a  
20 recommendation to FSIS that they need to do some  
21 soul searching in figuring out how they're going to  
22 get some research done on pre-harvest, in

1 particular, of animals for veal slaughter because I  
2 think that has to go hand in hand with our efforts  
3 to get more data collected on whether or not veal is  
4 a high-risk product, but I think we need to start  
5 the research process.

6           There is nothing that I have read about  
7 FSIS governance that says that FSIS cannot do  
8 research, so I think they need to reevaluate their  
9 position on research. And we have recommended CFI,  
10 that is, has recommended that they review that and  
11 so far that has not happened.

12           DR. SHULTZ: Comments?

13           MS. BUCK: Janet, would you have an idea  
14 where this might fit better, under Question 2 or  
15 Question 4?

16           Well, again, we need to have -- are there  
17 differences in the classes of veal that impacts  
18 slaughter and should be pointed out in FSIS policy  
19 documents? I think that's a call that could be used  
20 to do some research on the policy.

21           MS. MCGINN: Yeah, I would agree. I mean,  
22 we want it in our policy documents. We also, kind

1 of -- the other question is we do want -- our policy  
2 documents, in part, are influenced by research, so  
3 if we could get the research to kind of look at, you  
4 know, those pre-harvest factors, I think should be  
5 -- informal guidance.

6 DR. SHAW: And then I guess I would ask are  
7 you making a recommendation for us to consult with  
8 our ARS partners to look at getting research?  
9 Because we're not a research agency. So the wording  
10 has got to be delicate.

11 MS. BUCK: I understand. This is going  
12 to --

13 DR. SHAW: We don't conduct research, so it  
14 may be that we consult or work with our, you know,  
15 ARS partners or -- you know, I think -- I'm just  
16 saying --

17 MS. BUCK: Or there may be other avenues of  
18 getting research, either again looking at other  
19 options such as through grants that might be  
20 generated through FSIS or to partnerships with  
21 industry. There might be other avenues. But I  
22 really think that this is one topic where we have

1 some evidence that there is an associated risk with  
2 this product and you need to be able to pursue that.

3 DR. SHAW: I mean, I completely understand.  
4 I guess I would just say the wording should be, you  
5 know, delicately phrased as to --

6 MS. BUCK: Well, maybe --

7 DR. SHAW: -- what you're actually asking  
8 FSIS to do, are you -- make sure the wording, you  
9 know, that you're not asking us to conduct research  
10 because that's a difficult recommendation for us to  
11 do. But if you're asking us to work with others or  
12 a team or -- that's a different recommendation than  
13 actually asking us to conduct research, because  
14 that's a tough one for us based on what we do.  
15 We're a regulatory agency.

16 MS. BUCK: Well --

17 DR. SHAW: It's just the wording, I would  
18 say. The concept, I understand; the wording is  
19 where it becomes --

20 MS. BUCK: Maybe Craig has some  
21 suggestions.

22 DR. SHULTZ: The Committee recommends that

1 FSIS request that ARS perform research on  
2 pre-harvest risk factors associated with SPEC  
3 *E. coli* in veal slaughter.

4 MR. WINCHESTER: Leonard Winchester.

5 Craig, I just want to -- I think that this  
6 answer to what Pat is addressing, I think falls  
7 better under Question 4 than Question 2.

8 DR. SHULTZ: I agree.

9 MR. WINCHESTER: If we look specifically at  
10 2, I think we can already say we've moved past 2 and  
11 saying that we would like, based on some of the  
12 stuff that was brought up, you know, have an  
13 opportunity for industry to look at some parts of  
14 that, maybe?

15 But for Pat's specific -- research and/or  
16 pre-harvest controls and/or testing or research or  
17 partnering with other agencies, that would fall  
18 under another question.

19 DR. SHULTZ: And --

20 DR. MASTERS: Barb Masters.

21 And just somebody that watches the budget  
22 very closely, in my current job. I'm not trying to

1 influence the outcome of your situation, but I might  
2 encourage you to consider not directing all of your  
3 recommendation to ARS, but just to say, request ARS  
4 or consider any other avenue to have this research  
5 so that your recommendation all doesn't fall into  
6 one basket.

7 DR. SHULTZ: Okay. Could there also be  
8 some comment in there about research to support  
9 development of best management practices, perhaps in  
10 research, extension?

11 MS. BUCK: That might be a good idea. This  
12 is Pat Buck.

13 You might also want to include in there  
14 some research on how to best communicate because,  
15 you know, communications is a field pretty much all  
16 unto itself. So in having some research on how to  
17 best communicate to those small and very small  
18 plants --

19 DR. SHULTZ: I was thinking that might be  
20 best under 2 or under 5? Because I think there  
21 should be some comment at some point in this about  
22 -- not that we don't already use it, but plain

1 English, small plant -- measure.

2 MS. BUCK: It's best under 5.

3 DR. SHULTZ: Okay. We'll do that under  
4 Question 5.

5 Do we have anything with Question 3? So  
6 let's look at Question 3: What improvements can be  
7 made to the 2002 beef slaughter compliance guidance  
8 document to address unique aspects of veal  
9 slaughter?

- 10 • Is there guidance that does not apply to  
11 veal slaughter establishments?
- 12 • Is there guidance that needs to be added to  
13 address unique aspects of veal slaughter?
- 14 • Are there other changes to the guidance  
15 that are needed in addition to the changes  
16 currently under consideration?

17 How can we speak to that?

18 MR. WALDROP: Craig, this is Chris Waldrop.

19 I would suggest similar to what --

20 DR. RYBOLT: Take this, as well. I mean  
21 this one you could easily put out for comments and  
22 you get, you know, the industry comments. You could

1 get it out to each single veal operator or whatever  
2 for comment. If we can leave the compliance  
3 guidelines out now --

4 MR. WALDROP: These are wider than veal.  
5 They just want to get a general --

6 DR. RYBOLT: Yeah, yeah. Correct.

7 DR. MASTERS: This is Barb Masters.

8 And I agree with Michael. Since compliance  
9 guides go out for comment, you might make the  
10 updates with the callouts and then send it out for  
11 comments and see what kind of feedback you get based  
12 on your updates. And you may get some really good  
13 feedback for that, rather than saying what feedback  
14 would you give based on your experiences, do the  
15 callouts and then get some updates on it.

16 And then you have something out there as a  
17 draft that people often find and use that's useful.  
18 Because you have some very good thoughts in your  
19 draft and with what Michael had here, it looks like  
20 you have a really good start at it.

21 MS. BUCK: This is Pat Buck.

22 I would concur with that. I think it's

1 really important to get comments from key  
2 stakeholders in the production of veal.

3 DR. SHULTZ: Anything else?

4 DR. STIFFLER: As you guys conclude and put  
5 your final information together, again, I think you  
6 should be mindful of the fact that we have  
7 identified the pathogen as a hazard in the veal  
8 industry as well as the beef industry, so -- there  
9 are processes in place, both sanitary dressing  
10 procedure and interventions, who address those. And  
11 yes, there is some data, quite limited, but data  
12 that indicates there are at least incidents.  
13 There's an indication of processes out of control,  
14 but as we use the word less risk, where the  
15 intervention systems are working, we have not had  
16 any incidents of food-borne illness, to my  
17 knowledge. Again, so they are working, which  
18 continue to do all these things you suggest and  
19 embrace that. But this isn't a problem that is out  
20 of control; it's a problem that needs to be  
21 addressed.

22 MS. BUCK: This is Pat Buck.

1           And I do have a question for Dennis. I  
2 just make, as a presumption, that none of the veal  
3 is ever mechanically tenderized because it's very  
4 young meat.

5           DR. STIFFLER:     Not true.     Cutlets go  
6 through cubers and so there are impact/non-impact  
7 programs in place for -- in the veal industry, as  
8 well. It's limited. There's not needling and we  
9 don't do the blade tenderization of the product, but  
10 from the cutlet side of things, they are run through  
11 cubers and that would be considered a non-impact  
12 product.

13          MS. BUCK:     Thank you.     I find that  
14 troubling, but thank you.

15          MR. WINCHESTER:   I guess I just want to  
16 clarify that, maybe, Pat. Because I see the aspect  
17 of yes, there is cubing where -- Leonard Winchester.

18                 Cubing, as making of a cube steak or cube  
19 cutlet versus actual pinning or needling, which  
20 occurs with larger cuts of beef and/or meat and  
21 that's the -- you know. And I guess veal is not  
22 being done -- pinning is not occurring other than

1 actually cubing, which is -- I know it results in  
2 the same final cooked temperature, when we're  
3 looking at the retail side, but from a new  
4 perspective on what pinning is and/or needling in  
5 beef and the potential for FDA in wanting retail  
6 operations to identify that to retail beef  
7 consumers, not only to what we currently require  
8 restaurants to do and we, -- trying to think on the  
9 term I'm using. But is veal not doing that or are  
10 they? The actual pinning and needling.

11 DR. STIFFLER: To my knowledge, there is no  
12 tenderization of primers, putting it through a blade  
13 tenderizer, a pinning machine, needling. But there  
14 are cubing processes that the product does go  
15 through which would be defined as a non-impact  
16 product.

17 MS. BUCK: And if it's not impact, then it  
18 should be labeled just like -- that other beef  
19 products that have been needled or bladed will be  
20 labeled in the future, more appropriate to that.  
21 Thank you.

22 DR. STIFFLER: And if, in fact, that

1 becomes the regulatory requirement, that would --

2 DR. SHULTZ: Any additional comments,  
3 questions, additions, to the answers to the  
4 questions?

5 (No response.)

6 DR. SHULTZ: One question that I have --  
7 Janet's not here right now, but maybe some of the  
8 other FSIS representatives might be able to address  
9 it -- is we do have the two tiers in the veal  
10 industry, we've got bob and formula-fed.

11 And within those two subgroups, we do have  
12 an extensive grow-out industry and pre-harvest  
13 involvement on the formula-feds and basically none  
14 -- of course, there is no real grow-out period in  
15 bob veal. But still, there's a certain --  
16 management considerations.

17 There are management considerations that  
18 could probably reduce risk in bob veal; it's just an  
19 entirely different approach. But I was interested  
20 in Janet's comment that when you look at bob and  
21 formula-fed, that there wasn't a real significant  
22 difference in terms of problems with STEC. It's

1 about the same.

2 DR. SHAW: No. I mean, when you look at  
3 the sample results -- because I was sort of taken to  
4 task by Janet and Selena, that between the bob veal  
5 and the formula-fed, the sample results are not  
6 significantly different. They're getting positives,  
7 both of them. When we sample, we're getting  
8 positives from both of them at approximately the  
9 same rate. So the issue is there for both. It's  
10 not significantly different between the two groups.

11 DR. SHULTZ: And I would also suggest that  
12 probably the PRIs in formula-fed are much more  
13 involved in there than bob. I mean, I've been in  
14 formula-fed plants where they have steam  
15 pasteurization. It's just interesting, you don't  
16 see a difference.

17 DR. MASTERS: This is Barb Masters.

18 And there is at least some literature,  
19 scientific literature that would suggest that the  
20 bob veal may have more of an issue than the formula-  
21 fed veal, on the scientific literature. And so I  
22 don't know if FSIS will see that as they collect

1 more data; we don't know, obviously, with just  
2 limited data at this time.

3           But the scientific literature would suggest  
4 that the bob veal -- and it's typically been  
5 associated with the immuno-compromised -- so that's  
6 what the scientific literature would suggest. From  
7 international, where there's a lot more veal  
8 collected and a lot more veal samples.

9           DR. STIFFLER: Dennis Stiffler.

10           I can't address the bob veal on that. But  
11 there is also a pasture-fed veal program in certain  
12 parts of the country, as well, and there's as we  
13 know from the beef side, there are some definitive  
14 difference between grass-fed beef and fed steers and  
15 heifers and some other environmental and the  
16 sloughing rates and things like that.

17           So you would think these -- and I think the  
18 pre-harvest questions are very apropos to what we  
19 need to do to really understand how that load comes  
20 in through the system.

21           MS. BUCK: Thank you for that comment.  
22 This is Pat Buck.

1           And would FSIS, when they -- I don't know  
2 if it would be appropriate for us to bring it up,  
3 but when they do look, if they can look at pre-  
4 harvest, would there be some way to include  
5 information about any antibiotic residue increases  
6 in these animals?

7           DR. SHAW: I guess I want a little bit more  
8 clarification because --

9           MS. BUCK: Well, I've read a few articles  
10 that say that calves have a higher level of residue  
11 for antibiotics.

12           DR. SHAW: I mean, you can look at our own  
13 -- results of our residue verification testing and  
14 you will see --

15           MS. BUCK: Yeah, yeah.

16           DR. SHAW: -- the differences, yes.

17           MS. BUCK: So I would -- you know, if  
18 you're going to pursue research at pre-harvest,  
19 would it be possible to include something about that  
20 or is that something that's beyond the scope of  
21 NACMPI to make that suggestion?

22           DR. SHAW: I don't know. I mean, this is

1 just me, personally. I think when we start talking  
2 about research, and we are sort of getting onto the  
3 borders of NACMPI and NACMCF, if we go too far and  
4 -- I mean, I know -- to be honest with you, what we  
5 were really looking for is some real practical  
6 feedback from the Committee on, you know, veal  
7 slaughter and sanitary dressing and practical, sort  
8 of, feedback from this type of organization. I  
9 mean, I'm just going to be honest about that.

10 And so I don't know if we get too heavily  
11 into research and various things like that, are we  
12 getting into more of a NACMCF situation and leaving  
13 the NACMPI, sort of, you know, charge behind? I  
14 don't know. I'm just asking a question.

15 MS. BUCK: Well, I think you're quite right  
16 in that distinction, but by the same token, you  
17 haven't asked NACMCF this, so you're asking us and I  
18 think we are responding responsibly by saying  
19 something about the need for more research.

20 DR. SHAW: Maybe it's more of a situation  
21 that you want to talk about short-term and long-term  
22 because, you know, for us, we do have an issue. We

1 want to make some changes with our -- you know, the  
2 draft notices that we did and those are short-term  
3 things for us. Research is a more long-term  
4 recommendation, so maybe if the Committee considers  
5 short-term and long-term recommendations, maybe  
6 that's a way to sort of look at both of these issues  
7 so the research doesn't get lost. But that's a more  
8 long-term thing than a short-term feedback.

9 DR. SHULTZ: And the residue issue is  
10 primarily bob veal. That's where the problem has  
11 been, sort of associated with their heritage.

12 So is there any further suggestion about  
13 mention of residue/no mention of residue? What does  
14 the Committee say?

15 MR. WINCHESTER: Leonard Winchester.

16 I just don't think that that's currently  
17 what we're being asked, so at this point I'm saying  
18 no, but maybe as a recommendation under 4, when we  
19 look at Question 4, what are the differences and  
20 what impacts of slaughter could be pointed out in  
21 either the policy or a recommendation, that might be  
22 where we come out with these hey, we identified

1 that, you know, in bob veal there are certain  
2 characteristics that to be potentially addressed or  
3 looked at as versus regular veal.

4 And so I think this is where we talked  
5 earlier with pre-harvest controls as a possible  
6 partnership, you know, with others for research that  
7 under Question 4 we might recommend the Agency to  
8 look at that, you know, how can they partner with  
9 other people to potentially address concerns being  
10 brought by the --

11 MS. BUCK: I would concur and I think it's  
12 probably best to put that under long-term.

13 DR. SHULTZ: Anything else?

14 (No response.)

15 DR. SHULTZ: Would the Committee like to  
16 take a break?

17 UNIDENTIFIED SPEAKER: Yes.

18 DR. SHULTZ: Is everyone in agreement that  
19 we should take a break? And we'll get the language  
20 of this together.

21 MS. WILLIAMS: We will adjourn again at  
22 4:15 for the general meeting, so we'll take, like 10

1 minutes. I think we still have time to wrap  
2 everything up and bring up a good report. And FSIS  
3 is taking all recommendations. We don't want any  
4 recommendations to be guided, so all recommendations  
5 that the Committee have we are taking note of for  
6 the record.

7 (Off the record.)

8 (On the record.)

9 MS. WILLIAMS: Again, we want to have  
10 everyone reconvene. We're going to start.

11 Dr. Shultz is going to go through the  
12 Committee's recommendations and we're going to  
13 finalize the recommendations the Committee has for  
14 FSIS and then we will reconvene for the general  
15 meeting.

16 DR. SHULTZ: Okay, I think we have a  
17 quorum. Are we missing anyone?

18 MS. WILLIAMS: Yes. But we --

19 DR. SHULTZ: Okay. I'd first like to thank  
20 Chris, Steve, and Mike for their assistance in  
21 getting these into the current form they're in. And  
22 this is just a skeleton for us to work from to

1 develop the final draft.

2           So Question 1, the response to Question 1:  
3 The Subcommittee agrees that the current regulatory  
4 requirements applicable to beef slaughter operations  
5 are equally applicable for veal slaughter  
6 operations.

7           The Subcommittee recommends that FSIS  
8 revise Directive 6410.1 to include more veal  
9 industry specific language so there is a clear  
10 understanding by FSIS in-plant personnel of its  
11 applicability to veal slaughter operations.

12           The Subcommittee also supports increasing  
13 the sanitary dressing verification frequencies to  
14 establish a baseline. After some predetermined  
15 timeframe, for example, 90 days, the Agency should  
16 reevaluate the data and determine the need for  
17 further modifications to sanitary dressing  
18 verification frequencies.

19           The Subcommittee recommendation is that the  
20 verification frequency then be based on  
21 establishment specific performance.

22           Any -- Chris.

1           MR. WALDROP:    So that last sentence, I  
2 think is a little bit different than what I think  
3 the discussion was because I don't think that -- I  
4 think there's a baseline verification frequency  
5 which is once every 2 weeks, which FSIS does  
6 for --

7           DR. SHULTZ:    Right.

8           MR. WALDROP:    -- slaughter and now veal or  
9 in veal.    I think that the verification frequency  
10 could be increased.

11          DR. SHULTZ:    Okay.

12          MR. WALDROP:    Based on what happens in an  
13 establishment.  I don't think we're suggesting going  
14 below that, once every 2 weeks.

15          DR. SHULTZ:    Okay.    So what language  
16 recommendation do you have?  Verification frequency  
17 be increased?

18          MR. WINCHESTER:  Craig?

19          DR. SHULTZ:    Yeah.

20          MR. WINCHESTER:  Leonard Winchester.

21                 I was actually trying to answer that.  I  
22 think I originally -- we're just saying that no,

1 there shouldn't be an increase, but that this, what  
2 you're talking about here, actually falls under the  
3 next, Question Number 2, about the equivalence to  
4 the verifying veal slaughter sanitary dressing  
5 thing, so --

6 DR. SHULTZ: So this whole sentence should  
7 go down into 2?

8 MR. WINCHESTER: Yeah, the paragraph.

9 DR. SHULTZ: The whole paragraph, okay.

10 MR. WINCHESTER: So should the frequency of  
11 sanitary dressing verification be different for veal  
12 as compared with beef and I think we're -- and I  
13 actually said no, there shouldn't be any difference,  
14 but that under Question 2, it's addressed,  
15 initially, with improvements.

16 So anybody else? Okay, thanks.

17 MR. WARSHAWER: And Chris's question is  
18 still on the table when we get to that, Number 2.

19 DR. SHULTZ: So you want that there. We  
20 also want to change that last sentence, is that  
21 correct?

22 MR. WALDROP: I mean, we're essentially

1 affirming what FSIS is already saying they're going  
2 to do, so --

3 DR. SHULTZ: Is that frequency being  
4 increased based on establishment specific  
5 performance?

6 MR. WALDROP: Can be increased based on  
7 establishment specific performance. Sure, that's --  
8 may be increased.

9 DR. SHULTZ: May?

10 MR. WALDROP: Yeah.

11 DR. SHULTZ: Are we okay with that?

12 MR. WINCHESTER: Craig?

13 DR. SHULTZ: Yes.

14 MR. WINCHESTER: Back to Number 1.

15 DR. SHULTZ: Yeah.

16 MR. WINCHESTER: This is Leonard Winchester.

17 Do you want to answer that just as saying  
18 no, that we don't feel that there's a need for  
19 increased -- I mean, should we actually say the  
20 Committee, I guess, do we actually say no to that  
21 part of the question or just leave it off?

22 DR. SHULTZ: For those specific -- should

1 the frequency of sanitary dressing verification be  
2 different for veal as compared to beef? No.

3 MR. WINCHESTER: Yeah. I just think that  
4 maybe we should just say we identified that there  
5 shouldn't be a difference in verification between  
6 these two.

7 DR. SHULTZ: Well, I'll put a no there now,  
8 but I could eventually, perhaps, incorporate that  
9 into the text. What's your preference? You want to  
10 just do that in the text below?

11 MS. BUCK: I would do it in the text below.

12 DR. SHULTZ: Okay, okay. Wordsmith away.  
13 The Subcommittee --

14 MR. WALDROP: At this time, the  
15 Subcommittee does not believe that the frequency of  
16 sanitary dressing verification should be different  
17 for veal than beef.

18 MS. BUCK: Just repeat the sentence, I  
19 think. The Subcommittee does not believe that the  
20 frequency of sanitary dressing verification should  
21 be different for veal as compared with beef.

22 DR. SHULTZ: Does not believe that the

1 frequency of --

2 MS. BUCK: Sanitary dressing verification  
3 should --

4 DR. SHULTZ: Okay, I'll try and do that.  
5 Okay, get rid of the question mark.

6 Does not believe the frequency of sanitary  
7 dressing verification should be different for veal?

8 MS. BUCK: Yes.

9 MR. WINCHESTER: Yes.

10 MS. BUCK: Did you have frequency of --

11 DR. SHULTZ: I'll get rid of that. How's  
12 that? Are we okay with that?

13 UNIDENTIFIED SPEAKER: Yeah, put it --

14 DR. SHULTZ: I'll try to get there. I hate  
15 these touch pens. Okay. Anything else?

16 (No response.)

17 DR. SHULTZ: Are we okay?

18 So now what we have for 2: The  
19 Subcommittee recognizes the need to modify the draft  
20 notice on verifying veal slaughter sanitary dressing  
21 to be small and very small plant-friendly and to  
22 include more visual aids such as photographs.

1           Additionally, the Agency should work within  
2 its small plant outreach division to develop  
3 appropriate educational training materials.

4           The Subcommittee recommends that FSIS  
5 should seek veal industry expertise on best  
6 practices on sanitary dressing procedures.

7           The Subcommittee also supports increasing  
8 the sanitary dressing verification frequencies to  
9 establish a baseline after some predetermined  
10 timeframe, such as 90 days. The Agency should  
11 reevaluate the data and determine the need for  
12 further modification to sanitary dressing  
13 verification frequencies.

14           The Subcommittee recommendation is that the  
15 verification frequency may be increased based on  
16 establishment specific performance.

17           MR. WARSHAWER: That last sentence, change  
18 to may be -- okay. There's a little confusion.

19           DR. SHULTZ: Okay.

20           MR. WARSHAWER: There's a little confusion  
21 there because we wouldn't want it increased from the  
22 90-day increase. We would want it increased from

1 the every 2 week base. So the increase to 90 days  
2 is to establish a new baseline.

3 DR. SHULTZ: Yeah.

4 MR. WARSHAWER: We have -- I'm not -- Chris  
5 is saying that the new baseline can't be less than  
6 every 2 weeks.

7 DR. SHULTZ: Okay.

8 MR. WARSHAWER: Then we're saying other --  
9 beyond that baseline, increases will be necessary in  
10 establishment by establishment basis.

11 DR. SHULTZ: Okay.

12 MR. WARSHAWER: This is after the 90-day  
13 test run.

14 And Chris, could you explain why you're  
15 certain that either the 2-week baseline is what's  
16 needed or that plant-specific performance couldn't  
17 lead to a less than 2-week frequency?

18 MR. WALDROP: I was saying that FSIS has a  
19 baseline frequency for sanitary verification that  
20 they do both in beef slaughter and veal slaughter.  
21 And we don't want to go --

22 MR. WARSHAWER: As a regulatory minimum --

1           MR. WALDROP:    We don't want to go below  
2 that.

3           MR. WARSHAWER:  Right.

4           MR. WALDROP:    But if it turns out that a  
5 particular plant is having problems with sanitary  
6 dressing, then the FSIS inspector may want to  
7 perform more of those activities until that plant --  
8 they're confident that plant has that process under  
9 control.

10          MR. WARSHAWER:  Okay.

11          DR. SHULTZ:     Then the language would be  
12 that after the 90-day -- and so the purpose of the  
13 90 days is to see if the regulatory minimum should  
14 be -- no, it's just to establish the baseline per  
15 plant, isn't it?

16          MR. WALDROP:    The purpose of the 90 days is  
17 that FSIS is seeing problems in these plants around  
18 sanitary dressing and they want to focus some  
19 attention and effort around that area so that they  
20 can make sure that plants understand what they need  
21 to be doing during the sanitary dressing procedure  
22 and FSIS inspectors -- so that's why FSIS -- that's

1 what I understand why FSIS is doing this 90-day  
2 timeframe because they're focusing additional energy  
3 because they've identified that as a problem.

4 MR. WARSHAWER: This is not an attempt to  
5 change the regulatory baseline.

6 DR. SHULTZ: Right. Okay.

7 Any other comments on 2?

8 Go ahead, Chris.

9 MR. WALDROP: It may be better to define  
10 that small/very small plant-friendly.

11 DR. SHULTZ: Okay.

12 MR. WALDROP: What are we trying to say  
13 there?

14 MR. WARSHAWER: I remember. So that they  
15 are very short. Not short like me, but short  
16 documents.

17 DR. SHULTZ: Yeah.

18 MR. WARSHAWER: That's what we were getting  
19 at, Pat's comment that nobody who is in a very small  
20 plant reads 150-page documents no matter how many  
21 pretty pictures there are in it.

22 MR. WALDROP: Okay, because we do get into

1 that in the last --

2 DR. SHULTZ: Yeah, we also -- we go back  
3 there in the last, yeah.

4 MR. WARSHAWER: So is that enough  
5 specificity to what we mean there, because we're  
6 going to get to it in Question 5?

7 MR. WALDROP: Question 2. I think it might  
8 be because I think Question 2 we're talking about a  
9 notice to --

10 MR. WARSHAWER: There's Question 2.

11 MR. WALDROP: Just trying to verify whether  
12 or not the document we're talking about, it goes --  
13 is directed to inspectors or it's --

14 DR. SHULTZ: What improvements can be made  
15 to the draft notice on verifying veal slaughter  
16 sanitary dressing to address any additional unique  
17 aspects of veal slaughter and processing not  
18 currently in the document?

19 MS. BUCK: You might want to -- this is Pat  
20 Buck.

21 You might want to change friendly and just  
22 say communications.

1 DR. SHULTZ: How about --

2 MS. BUCK: Maybe communications to  
3 inspectors or plant personnel?

4 DR. SHULTZ: To be very small plant -- to  
5 be very small -- to be small and very small plant  
6 what? To more effectively communicate to small and  
7 very small plants?

8 UNIDENTIFIED SPEAKER: Yeah, that's --

9 MS. BUCK: Yes, to be more effectively --  
10 to have more effective communications with small and  
11 very small plants.

12 DR. SHULTZ: To more effectively  
13 communicate standards to --

14 MS. BUCK: Yeah.

15 DR. SHULTZ: -- small and very small  
16 plants?

17 MS. BUCK: Well, it's not just standards,  
18 it's information.

19 DR. SHULTZ: Okay, we can just say  
20 information. How about that?

21 MS. BUCK: Maybe you want to qualify it and  
22 say FSIS information?

1           MR. WALDROP:     Just call it regulatory  
2 guidance.

3           MS. BUCK:     Yeah, we could say regulatory  
4 information.    Yeah.

5           DR. SHULTZ:    How are we doing?

6           MS. WILLIAMS:   I want to let the committee  
7 know we have 5 more minutes.

8           DR. SHULTZ:    Are we okay with that?

9           (No response.)

10          DR. SHULTZ:    On to Question 3.   Question 3,  
11 we basically responded to in the same manner that we  
12 responded to 1. Refer them to 1 and say additionally  
13 the Agency should make its necessary changes to the  
14 compliance guidance noting the changes and  
15 incorporate veal-specific guidance language.

16          The Committee recommends that the Agency  
17 then submit the modified compliance guidelines for  
18 stakeholder comment and suggestion.

19          Comments, revisions?   Are we okay?

20          (No response.)

21          DR. SHULTZ:    Hearing none, Question 4:   Are  
22 there differences in the classes of veal (bob veal,

1 formula fed, non-formula fed, and heavy calf) that  
2 impact slaughter and should be pointed out in FSIS  
3 policy documents?

4 Our response: The Subcommittee recommends  
5 that the Agency confer with ARS or other research  
6 providers to conduct pre-harvest risk factors  
7 associated with STEC in veal slaughter.

8 The Subcommittee also recommends the Agency  
9 promote research into the development of industry  
10 best management practices. As a long-term goal, the  
11 industry should address the animal drug residue  
12 challenge in bob veal calves.

13 MR. WALDROP: Just a wordsmithing --

14 DR. SHULTZ: Wordsmithing.

15 MR. WALDROP: Pre-harvest research to  
16 inspectors.

17 DR. SHULTZ: Yeah. Should conduct pre-  
18 harvest --

19 MR. WALDROP: Research to inspectors.

20 DR. SHULTZ: Pre-harvest research, okay.  
21 Change it again?

22 The Subcommittee recommends the Agency

1 confer with --

2 MR. WALDROP: I'm sorry. It's probably  
3 conduct research into pre-harvest risk factors.

4 DR. SHULTZ: Pre-harvest.

5 DR. SHULTZ: Are we going to get rid of  
6 this?

7 So the Agency confers with ARS or other  
8 research providers to conduct pre-harvest research,  
9 to conduct research.

10 Is that okay?

11 MS. BUCK: Yes. I think that looks good.

12 DR. SHULTZ: Okay. I'll put a hyphen  
13 there. Okay.

14 Question 5: What innovative strategies can  
15 the Agency use to help industry (comprised of small  
16 and very small establishments) and FSIS inspection  
17 personnel better understand the needs for  
18 slaughtering animals used to produce veal products?

19 And our response: The Subcommittee  
20 recommends that the Agency works with its small and  
21 very small plant outreach division to develop  
22 communications targeted to veal slaughter

1 establishments. The material developed should be  
2 short and concise where possible. The guidance and  
3 tools should include visual materials, plain  
4 language, i.e. non-regulatory guidance documents.  
5 FSIS should also develop webinars, regional  
6 meetings, and partnering with state extension  
7 services to deliver this information.

8 DR. LORENZEN: I think you should take  
9 webinars out because most of my small/very small  
10 processors --

11 DR. SHULTZ: Don't do computers.

12 DR. LORENZEN: -- do not have Internet,  
13 especially not in the plant.

14 DR. SHULTZ: Okay. Do we all agree with  
15 that?

16 DR. LORENZEN: Oh, but I like the idea of  
17 DVDs that they could play at home.

18 DR. SHULTZ: Yeah. Go ahead.

19 MR. WINCHESTER: I wouldn't remove webinars  
20 because there are places that do have it, so I would  
21 just say that --

22 DR. SHULTZ: Okay.

1           MR. WINCHESTER:       -- in addition to  
2 webinars, create DVDs that could be distributed  
3 maybe after you have a webinar or something, so --

4           DR. SHULTZ:    Okay.

5           MR. WINCHESTER:   Don't eliminate something  
6 that's available --

7           DR. LORENZEN:   Okay.   My other argument  
8 with webinars is my processors will not take time  
9 out of their day to attend a webinar and shut down  
10 their plant.       But they would watch a DVD,  
11 potentially, at night.

12           MS. BUCK:    Yeah, I think DVDs need to be  
13 included in there and we don't -- do we have them  
14 there?  We need to include DVDs.

15           DR. RYBOLT:   Maybe we can create language  
16 that makes it part of the recommendation is that  
17 they seek all venues or tools or whatever the word  
18 is for it.  Right?  To make sure that we capture all  
19 that.

20           DR. LORENZEN:   They also won't attend  
21 anything until it's an emphasized directive.

22           MS. BUCK:    I think I'm saying all venues?

1 DR. SHULTZ: Are we okay?

2 DR. LORENZEN: Yes.

3 UNIDENTIFIED SPEAKER: You want to put that  
4 to their attention --

5 DR. SHULTZ: We made it.

6 MS. WILLIAMS: Okay. Thank you, Dr. Craig  
7 Shultz, for serving as the Committee's chair.

8 That adjourns our Subcommittee for the veal  
9 slaughter. Thank you.

10 MS. BUCK: We want to add something.

11 DR. SHULTZ: At the end of extension  
12 services.

13 MS. BUCK: And other --

14 MR. WINCHESTER: And/or other --

15 MS. BUCK: Appropriate venues.

16 DR. SHULTZ: How is that? We okay?

17 MS. BUCK: Yeah, that works.

18 DR. SHULTZ: Okay. Yeah, agreed.

19 (Whereupon, at 4:25 p.m., the subcommittee  
20 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 1

VEAL VERIFICATION

Washington, D.C.

January 16, 2013

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.

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CATHY BELKA, Reporter

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