

BACKGROUND

On October 7, 2016, the National Sustainable Agriculture Coalition organized a meeting between USDA representatives and about 15 stakeholders representing small and very small processing plants, the National Farmers Union, and the American Grassfed Association. The USDA representatives included FSIS's Deputy Administrator, as well as senior leaders from the FSIS Office of Field Operations, Office of Policy and Program Development, Humane Handling Enforcement, and Labeling Programs. A representative from the Office of the Secretary also attended and participated. In addition to a substantive discussion about various inspection issues and USDA resources to support small-scale livestock operations, meeting participants worked to identify a number of joint policy recommendations.

RECOMMENDATIONS

Agency/Stakeholder Agreements

Stakeholders and FSIS agreed upon the following recommendations and are working to implement them.

1. Hold quarterly meetings between FSIS and small and very small plant owners and operators and the farmers they serve. Host the meetings in various regions of the country to ensure wide participation.
2. Keep lines of communication open. FSIS will provide a list of key agency contacts and make agency leadership accessible. Industry participants will elevate concerns to the District Office or to Headquarters when issues arise.
3. As quarterly meetings continue, FSIS will use those gatherings as an opportunity to schedule correlation meetings. These meetings include local inspection program personnel or their supervisors, so that all participants receive the same information at the same time, minimizing confusion and ensuring a consistent approach. FSIS will work with small plant owners and operators to clarify Agency requirements so that the plants can make any changes needed for compliance.
4. In addition to posting compliance guides on the web, FSIS will ensure wider distribution through a variety of outreach activities. FSIS will regularly review outreach programs, including the Help Desk, to ensure that outreach efforts are appropriately reaching small and very small establishments. Periodically review budget and staffing needs and opportunities to determine if any increases are warranted.
5. FSIS will solicit regular input from interested parties, including through the quarterly meetings and from farm, trade, and education organizations and networks, on suggested topics for new or revised compliance guidance documents of particular interest to small and very small plants.

6. FSIS will issue a Small Plant News edition that explains the purpose and design of the FSIS verification testing programs with a specific focus on how FSIS apportions sampling based on individual establishment production volume.
7. FSIS will develop and promote a new, updated webinar with Niche Meat Processor Assistance Network on the Label Submission and Approval System (LSAS).

Additional Stakeholder Recommendations

Stakeholders suggested a number of additional changes.

1. FSIS should develop approaches to inspector training that are specific to and sensitive to the needs of small and very small plants, ensure performance standards are fair and sensitive to small/very small plants, and explore options to improve consistency in interpretations of rules.
2. FSIS should revise the pathogen-testing regime to ensure sample size proportions are the same for large and small plants.
3. FSIS should create a new position of food safety ombudsman in the Office of Policy and Program Development, similar to the existing position of humane handling ombudsman.
 - In 2010, FSIS appointed a humane handling ombudsman, as directed by Congress. FSIS believes that creating a food safety ombudsman would also require Congressional direction.
4. FSIS should issue new guidance documents, with stakeholder input, on the retail exemption, poultry exemption, and dry-cured production of uncooked, ready-to-eat items.
5. FSIS should explore ways to make animal raising claims and third party certifications more transparent to farmers and consumers. This should include developing rules and/or guidance that provide for strong, clear, transparent, uniform, and enforceable animal raising claims, as well as supporting increases in budget and staffing for the labeling division to help facilitate this transformation and improve follow up and enforcement.
6. More broadly, USDA Rural Development and USDA overall should review and revise existing programs, including Business and Industry Loans (especially Local and Regional Food Enterprise Loans), the Rural Development Loan and Grant Program (Red Leg), and the Rural Energy for America Program (REAP), among others, to provide better options for grants and loans for meat processing plants to upgrade to state or federal inspection, including retrofits like lighting, cooling, humane handling equipment, etc.

NEXT STEPS

The next quarterly meeting between FSIS and stakeholders will be in March 2017 in Little Rock, Arkansas. In addition to the FSIS team, Tricia Kovacs, USDA's local and regional food systems policy advisor, will also attend.