

UNITED STATES DEPARTMENT OF AGRICULTURE

IN RE:	X	HELD JUNE 2, 2004
	X	8:30 A.M.
NATIONAL ADVISORY	X	HILTON ALEXANDRIA OLD TOWN
COMMITTEE ON MEAT AND	X	1767 KING STREET
POULTRY INSPECTION	X	ALEXANDRIA, VIRGINIA
MEETING	X	

VOLUME IV OF V

STANDING SUB-COMMITTEE NUMBER 3

FOOD SECURITY

APPEARANCES:

MR. MICHAEL GOVRO, Sub-Committee Chairman
 Food Safety Division
 Oregon Department of Agriculture

DR. CAROL MACZKA
 Assistant Administrator
 Office of Food Security and Emergency Preparedness
 Food Safety and Inspection Service
 United States Department of Agriculture

DR. PERFECTO SANTIAGO
 Executive Associate
 Office of Food Security and Emergency Preparedness
 Food Safety and Inspection Service
 United States Department of Agriculture

MS. LINDA RUSSELL
 Strategic Initiatives, Partnerships and Outreach
 Food Safety and Inspection Service
 United States Department of Agriculture

MR. RON HICKS
 Office of Program Evaluation, Enforcement and Review
 Food Safety and Inspection Service
 United States Department of Agriculture

APPEARANCES (Cont.)

R & S TYPING SERVICE - (903) 725-3343
 5485 S. Live Oak, Gilmer, Texas 75644

DR. GLADYS BAYSE
Department of Chemistry
Spelman College

DR. JILL HOLLINGSWORTH
Vice President, Food Safety
Food Marketing Institute

MR. MICHAEL KOWALCYK
Chapter President
Dane County Chapter of Safe Tables Our Priority
Madison, Wisconsin

MR. MARK SCHAD
Schad Meats, Incorporated
Ohio

MS. MARY ANN ALBERTSON

BRIEF APPEARANCE:

MR. ROBERT TYNAN, Deputy Director
Strategic Initiatives, Partnerships and Outreach

REPORTER: MR. BOB ADDINGTON

CONTRACTOR (NOT PRESENT): R & S TYPING SERVICE
(903) 725-3343

I N D E X

	<u>Page</u>
VOLUME IV:	
OPENING	
Mr. Michael Govro	
INTRODUCTIONS	
GENERAL DISCUSSION	
ADJOURNED	

P R O C E E D I N G S

R & S TYPING SERVICE - (903) 725-3343
5485 S. Live Oak, Gilmer, Texas 75644

2:45 p.m.

MR. GOVRO: I'd like to do some introductions, I see a few people that I don't know around the room. I'll start with myself.

I'm Mike Govro, and I'm with the Oregon Department of Agriculture Food Safety Commission. I've worked there for 27 and some years, in the Food Safety Division, and our program deals with manufactured foods, retail, shellfish program, and dairy, as well as some water work.

In my capacity right now I'm sort of the acting agency bioterrorism coordinator, so I'm a little bit familiar with some of these issues, and I'm also a member of the AFDO Food Security -- Multi-State Food Security Task Force Committee, which is attempting to put together a 50-state meeting to address food-security issues.

MR. SCHAD: I'm Mark Schad, with Schad Meats. I have a very small operation in Cincinnati, there's four full-time people and one part-time person. Maybe something else I should mention, when I first graduated from college I worked for Research and Development for Peter Eckridge in Fort Wayne, so I've also been in -- worked in large plants also.

DR. MACZKA: Carol Maczka, and I'm the Assistant Administrator of the Office of Food Safety and Emergency Preparedness.

MR. KOWALCYK: Mike Kowalcyk. I'm the Dane County,

Wisconsin Chapter President of Safe Tables Our Priority.

DR. BAYSE: Gladys Bayse, Department of Chemistry, Spelman College. I teach courses in biochemistry and toxicology and do a little research on some of the (inaudible) that are in poultry and swine (inaudible).

MS. RUSSELL: I'm Linda Russell, I'm FSIS, Strategic Initiatives, Partnerships and Outreach. We do a lot of the workshops in small and very small plants.

DR. MASTERS: Barb Masters, FSIS, and I'm in and out just briefly, just wanted to make sure everything was working smoothly before I took off again.

MR. SANTIAGO: Perfecto Santiago, I am the Executive Associate (inaudible).

UNIDENTIFIED FEMALE: And I'll make the comment here that was something -- we're very pleased that Dr. Santiago willingly went on detail to Food Security, we believe -- he's permanently in our policy office, but he went over to assist Carol on something we saw was a need in our area of food security and the need to help bring things back to the Agency, and Dr. Santiago has been very actively involved from a policy perspective of food security but has also been a district manager, so he's been a real asset already to Dr. Maczka, to Carol, and so we're really pleased that he's been willing to be on that detail. (Inaudible), and that's why he's here, and we appreciate his willingness to help in the area of food security.

MR. HICKS: Ron Hicks, Office of Program Evaluation (inaudible), and my goal is to make sure (inaudible) different issues (inaudible) --

(Laughter.)

MR. HICKS: -- (inaudible).

MS. STUCK: I'm Karen Stuck, Assistant Administrator with the Office of International Affairs (inaudible).

MS. ALBERTSON: I'm Mary Ann Albertson, with the Office of Food Security. One of the things I helped work on for Food Security is the development of our various guidelines (inaudible).

MR. GOVRO: Okay. In the past when we've had these committee meetings we actually usually have more than two questions and so we've sort of broken down into one or two people for each question and sort of tackled them separately.

As I see these questions, the answer to Question Number 2 really depends on the answer we come up with for Number 1, so I think we should just, as a group, tackle each of these together, and we'll try and write something up before we finish, to give -- to distribute. Everybody agree with that?

(No response.)

MR. GOVRO: All right. Well, I distributed to the members of the sub-committee some preliminary thoughts that I had put down yesterday as I was traveling here, and I think

for the benefit of the rest of the group, that haven't seen them, if you don't mind I'll start by reading those and maybe we can use those as a starting point to proceed with the discussion of Question Number 1. That okay with everyone?

(No response.)

MR. GOVRO: "Should FSIS require food-security plans at plants," and my comment was that I'm not comfortable giving the Agency an unqualified answer to this question. In my mind, in order to establish new rules, several conditions must be met: there must be a demonstrated need for the rules; the Agency must be able to establish rules that are enforceable and will achieve the desired improvements; and the resources necessary to follow through must be available.

In a sub-committee meeting a year ago the sub-committee advised that it did not believe that FSIS should establish plant security rules. The sub-committee believed that a cooperative approach between industry and FSIS would be the best approach. The sub-committee was also concerned with the difficulty of establishing and enforcing rules that work with all types and sizes of plants. While this question that we're posed today is not identical, it's substantially the same.

And then we'll follow with the questions that Carol read during the full committee meeting today, which I don't think we need to read again, but they basically get to the conditions that I thought would be necessary in order for the

Agency to be justified in establishing new rules.

So we got at least some answers to those, but I think probably the biggest one for me is: is there a real need for this, and I guess I would like to hear from the other committee members if they have any knowledge or thoughts on that question.

DR. BAYSE: I think you were on the sub-committee that you speak of, I know I was not, the previous sub-committee, right?

MR. GOVRO: I was not.

DR. MASTERS: Would it help to hear a little bit more about that?

MR. GOVRO: Sure.

DR. MASTERS: And I do know that downstairs frantically worked in trying to get that report (inaudible).

MR. GOVRO: Okay, and it should be on your transcript from (inaudible) --

DR. MASTERS: (Inaudible.)

MR. GOVRO: That's what Jill asked for in the meeting. I can't remember the phrasing of the exact question, but it referred to plants, I think it referred to: should the Agency seek authority to enforce food security rules? or something to that effect. Mark, do you have a thought on this?

MR. SCHAD: Well, I just was thinking in terms of -
- whenever questions come up like this, I always think in

terms of my operation first --

MR. GOVRO: Uh-huh.

MR. SCHAD: -- and like I said before, there's only -- there's only five of us altogether, so we know each other pretty well, it's -- it's a relatively small building, and the -- there's only a couple doors where you can get in and out of the place, and we always know if there's somebody that's strange or something inside the plant, it's small enough that I know right away, and -- but having said that, should I be able to say that I need to know the food security plan and leave it that? I'm not sure but -- about that, but I think at the very least I should at least do at least a written self-assessment, saying that food security is a minimal issue and jot down the reasons --

MR. GOVRO: Uh-huh.

MR. SCHAD: -- date it, sign it, and be there for whoever from the Agency might (inaudible). And like, on the other hand, I worked at large plants, and after terrorism became a big issue, a lot of my thoughts were toward the larger plants I used to work in, and I could see how vulnerable they were, because of the easy access. At just some plants, I'm not -- I'm not saying large plants as a whole, but I can see where some large plants would have that as an issue. And also the constant turnover of labor, the constant pressure or need for labor to actually get the production done. So what is it coming to, one size -- I mean

one plant does not fit all sizes, it needs to be tailored to each individual plant, I think.

MR. KOWALCYK: Carol, I have a question --

DR. MACZKA: Could I just answer that first?

MR. KOWALCYK: Oh, you bet, please.

DR. MACZKA: I didn't (inaudible).

(Laughter.)

DR. MACZKA: One of the things that we realize is some of the measures that are proposed could be extremely expensive, especially for small operations, and so one of the things we've tried to really gear people towards is thinking about high-risk products and areas which are particularly vulnerable, so I just wanted to throw that on the table, and so like when you say "one size doesn't fit all": if they have those high-risk characteristics, that would be a vulnerable area, and, you know, every plant could look at its own vulnerable areas, and if you have a high-risk area, that's what we're really asking you to focus your attention on. So, you know, that's a way of actually cutting down on some of the costs of all of this.

MR. GOVRO: Mike.

MR. KOWALCYK: A couple questions I had. From working in business, I work at a large corporation that -- we're not in the food business, but we ship a lot of merchandise, direct (inaudible) merchandise, and because of that, we have a very large distribution center, and I can

see, just based on the amount of trucker traffic that comes in and out and the amount of product that goes through our facilities, where there are needs for safeguards and protecting the assets.

Now, I can only assume that food producers have those safeguards in order to protect our assets, you're not going to go through the time and effort of conducting your business and not make sure that what your product is is not going to be kept so that you can put it into commerce, and to Mark's point, in a very small operation those issues don't apply as much, you don't have the truck traffic, you don't have the employee turnover.

I guess some questions I have for the Agency is: What type of -- and when I think of food security, I'm thinking of something of a more arduous scale: does the Agency have an emergency-response department that would mobilize and work with, I don't know, maybe FEMA or Homeland Security to address if somebody did something really bad to a large amount of product, and a vulnerability assessment for certain products that are produced in large batches are seen as larger -- more significant risks.

But, again, part of me thinks that: is this a hazard that's likely to occur, compared to the unintentional contamination that is dealt with, whereas you would require plants to mitigate those things.

And another question I would have, you know, if

there's any information that can help us, is: when the security level was raised to orange, I think it was raised to orange once or twice since 9/11, what, if any, actions did FSIS take in response to that security threat elevation; and did industry do anything different, that might be easily incorporated industry-wide?

So those are some things -- I've been trying to decide on: 1) whether a plan to be good, then what would we recommend, maybe seeing what resources are currently available, that industry can use and the Agency can use to address these concerns?

DR. MACZKA: In terms of the likely -- I'm a risk assessor too, so: is it a hazard likely to occur? Again, I think we've already answered that, is that these are unlikely events but they have occurred.

Now, I think to really answer that question, though, part of the information comes from the intelligence community, and we have been given briefings, and this is definitely one of the targets of these -- al Qaeda and all these other terrorists, and they have manuals on how food is produced, the agents that they could use, products they would target, so you can't dismiss that kind of information.

I mean, how else would you -- how else are you going to evaluate a likely hazard? That is -- that's part of the equation, to take into consideration that information. And what did we do under the elevated threat conditions? We

did do things. We increased our sampling efforts for certain threat agents. Normally we screen for something like 15 to 20 percent, we take 20 to 15 percent of our samples, split it, and look for certain threat agents.

When the conditions were elevated we did -- 50 percent of our samples were split and we looked for threat agents. And I know we increased vigilance (inaudible) in terms of inspection activities and people that are in distribution warehouses and people at the ports, all that inspection activity was increased, at a cost to the Agency. All that was at a cost to the Agency.

MR. HICKS: And they also -- there was some communication with industry (inaudible) people in the Agency and asking (inaudible).

DR. MACZKA: You know, the other thing I just wanted -- like the guidelines, as I said (inaudible) before the development of the vulnerability assessments, so even if you -- your recommendation is not to move to a mandatory plan, one of -- these things do need to be updated. I don't know if any of you have ever looked through these things, it's a good first start, but pretty much you're looking at everything when you read this thing, and there's no priority order here, you know. So, I mean, I do think to a certain extent we can hone in on certain things if we were to update those.

And there's one other point I want to make, is

that, you know, a lot -- some of the stuff is not directly under our purview, like transportation, you recommend, so if somebody "it would be good if FSIS reached out to industry," well, that's important, but it's also important that this Agency reach out to other agencies, that we have overlapping jurisdictions, and an example is transportation, which is particularly (inaudible).

MR. GOVRO: Jill, before you came into the room we went around and introduced ourselves, and I don't think we want to do that again, but you might want to introduce yourself, your background.

DR. HOLLINGSWORTH: All right. I'm Jill Hollingsworth. I'm with the Food Marketing Institute, which is the trade association here in Washington that represents grocery stores, but we also do retailers and wholesalers, not restaurants, though.

My background, I've been with FSIS for six years. My areas are food safety, they spill over a bit into food security, but the primary focus is on food safety. Prior to that I was with FSIS for 15 years, started out as a -- actually, a veterinarian in a poultry plant and left as the deputy administrator, so I've kind of moved up through a lot of positions at USDA.

And the reason I was late, actually, is I had been downstairs waiting on a fax, which still hasn't come, I thought it might be useful to share with this group the

organizational chart that the food and agriculture (indiscernible) has put together to show how the industry is going to organize itself to come up with a whole plan for: how do we communicate during times of crisis? how do we do -- or how do we use the assessments that the government has done? how do we link that with DSHS and the information that the Department of Homeland Security is asking of the food and agriculture sector, we're looking at a much broader scope, that is all way from the farm to the table, but it includes things like animal disease surveillance, not just food, and I hope to have that chart in the next few minutes so I can share it with you.

But I think what it will show is that there's a comprehensive body of work being done that I see as a very different approach, maybe, than what we've done in food safety in some respects, because it is truly a total industry with government collaborative effort.

I know we talk about collaborating on food safety, but it very much is the regulated and the regulator. I have not seen that as much on the security side, and I guess my one concern about this issue, and what I was hoping to see what the resolution of the recommendation was from last time, is I think the position has always been: if this becomes just mandating plans, then it becomes a regulatory paperwork exercise, we might lose some of that good momentum.

MR. GOVRO: One of the things I've seen sort of in

regard to industry regulatory cooperation -- actually, it's really just been on the industry side, has been market pressures, and we've seen this with the third-party certification with Good Agricultural Practices, and rather than codifying them, it seems that the market has taken over and the big purchasers of products have required their vendors to meet certain standards, and because of that there's an abundance of third-party-certification groups out there doing work in both Good Agricultural Practices as well as meeting supplier specifications, and I think I'm seeing some of that taking place in the security sector as well, those criteria being folded into the specifications that they have for vendors, and I think some of the groups like Pinkerton (inaudible), that sort of thing, are incorporating food security into what they buy it for.

Getting back to my question, is there really need for rules, I'm not convinced that there is a need. Gladys, do you have anything you wanted to add or any questions you might want to ask?

DR. BAYSE: I'm still struggling with: suppose that there was such a process, how could it be equitable both for a plant like Mark (inaudible) large (inaudible) very awkward, but I think there still is the concern that -- and that sounds very -- what Jill [phonetic] has put forward sounds very good, but that's not everything, I guess (inaudible) in this process, so we need still some more

discussion and maybe perhaps even from Carol about some other examples of your perception of why this would be a good thing, to go forward in terms of adopting it.

DR. MACZKA: Well, I'm not really advocating that you go one way or the other, actually what I'm really looking for, your insight into this, so, you know -- so I'm not going to push one thing --

MR. HICKS: If I may, that is particularly one I would like to make sure we have on the table, because we had the same kind of discussion as we've talked about this internally (inaudible), and this is one of those issues where everybody wants to be on the right side of it and (inaudible), but the question really is, and an honest one and a genuine one, is how far it should be [phonetic] going.

MR. GOVRO: Uh-huh.

MR. HICKS: I'd simply note at the Hill [phonetic] it's been discussed a lot (inaudible) and whether or not all is being done that should be done, so it really is (inaudible), doing all that they should be doing, and that's the best way to put it, and so (inaudible).

MR. GOVRO: Well, one of my problems, I guess, sort of structures my thinking about this question, is: what I have to use as an example of recently-adopted rules are the HACCP requirements, and they've been, I think it's fair to say, fairly contentious over how the plan should be implemented and what are adequate controls, where the control

points should be.

I know at least on the FDA side of things it was -- the idea of HACCP was that "This is your plan, you write the form to fit your establishment," but then when plants did that, they found out that there was a Hazards Guide, that very specifically told them where the hazards were and how they had to -- what adequate controls were to address that.

So as I look at some of the information that's in here about -- "effectiveness may be assessed by identifying hazard control points, determining the method, frequency, and limits that must be met for control points, and developing and monitoring the verification plan to pinpoint needed corrective and preventive actions," it sounds an awful lot like HACCP and it sounds like something which could in rule - - could become very burdensome for both the plant and the Agency.

DR. MACZKA: I'm not quite sure how you'd do that, even, to be perfectly honest.

MR. GOVRO: Right.

DR. MACZKA: If you really read what that says, like --

MR. GOVRO: Yeah, and --

DR. MACZKA: How do you verify that?

MR. GOVRO: Right, how do you verify something -- it's kind of like verifying where (inaudible) is, and --

UNIDENTIFIED FEMALE: I wasn't (inaudible) up today

so therefore I haven't furnished it [phonetic] --

MR. GOVRO: Yeah. And would failure to monitor -- you know, if you were supposed to go check to make sure that a security light was working and you failed to do that, would that mean that then product was compromised and -- I mean, and that's what you do when you have a failed [phonetic] critical control point in HACCP, is that you have a corrective action (inaudible) if you can, verify temperature (inaudible).

So I definitely think that if we proceed if at all down this road, it wouldn't be very far, and I guess the question I have, of the Agency, is: If you were to make a requirement that each plant would be required to do an assessment in the following seven areas, whatever you had, physical security, employees, and so forth and so on, and allowed -- and basically that was it, you need to do an assessment and write a report.

Then what Mark said he would do in his situation, where there's five people working there, is that, you know, "I've looked at these things and none were of concern because we're five people and we're family and we don't need to do any more than that," that that would be adequate and -- would you be comfortable with something that was that vague and that --

DR. MACZKA: I can answer that question.

MR. HICKS: Go ahead.

DR. MACZKA: I mean, I would feel comfortable with that, because I think he does know his employees and he's looking about who's entering and leaving the plant. That's what we're asking people to do, just check those things, because you can't say that of all the large plants, I mean you have a lot of people coming in and out and -- so -- but, you know, if each one did a self-assessment, that would go a long way. I'm all about increasing awareness and self-assessments, so --

MR. HICKS: I wanted to make sure I didn't contradict my food security person (inaudible). No, I think that we would have to be satisfied with something like that, and I think that you're right, with the larger plants, what are they doing, and maybe they're doing their job well (inaudible), or maybe they're just not paying much attention to it at all, and to me, our challenge is: trying to find out just what folks are doing (inaudible) should be doing.

So I think that kind of -- I'll see (inaudible) downstairs, you mentioned in your first question, that may be a way to go.

DR. MACZKA: You know, your question here, your first question, you know, the one that says: Has the Agency done some kind of check of the Security Guidance, how well industry's following the Security Guidance. If there were -- I just want to pose this question. If there were a way to do that, what would you think of the idea of -- if there was a

way to do that, evaluate plants as to whether they're following guidelines or some measures, and then if the code went up in level, like say went from orange to red, you know, (inaudible) specific to agriculture, and if you knew that a plant already did this assessment and you can somehow document that, to not spend as much resources on looking at a plant like that during a heightened level of concern but looking at other plants that haven't done it. In other words, I'm kind of going for the incentive angle.

MR. GOVRO: We should probably start writing some of these things down. I guess my first point was just a simple -- require that the plant do an assessment, and I'd ask you to restate that.

MR. TYNAN: Mike, before you get too far into writing things down, here's the Sub-Committee report from last year on awareness of food security, and this is the issue paper that's based on (inaudible).

MR. GOVRO: Thank you.

(Mr. Tynan exits room.)

DR. HOLLINGSWORTH: One of the things that -- when I first got the packet and was reading over this issue, the items listed on Page 2, under the Agency's PD Number 9, which actually covered all of agriculture and food, I thought they were some of the most relevant set of bullets I've seen on an issue, and that was looking at -- you know, I'll just read them here:

The awareness and training component, which also Mike had brought up here, about who's been trained and who needs to be trained.

The vulnerability assessments, that I think are being done both by food and agriculture agencies but also from those people who have taken maybe a higher look, not necessarily at plant level but the whole infrastructure of the food system in this country, doing those kinds of vulnerability assessments, and that's under way, looking at the mitigation strategies, and I know that's been started and there's more work to be done yet on that, from those vulnerability assessments.

Response planning and recovery. To me, one of the big things there is that needs to be a team effort, it's not just the one plant that has a problem, it's when our entire food supply is in jeopardy, and I guess that's the way I'm sort of looking at this. The more exposure that we've had to the ISOP and to the whole idea of our agriculture and food infrastructure, is how do we look at that whole system, not just this plant or that plant kind of thing.

The outreach and professional development, I think one of the big things there -- well, let me come back to that. And then research and development. But on the outreach, one of the things that struck me about this is, maybe instead of just mandating people must have plans, maybe one of the things that FSIS could do, that would really help

the industry, is -- especially if you're going to revise your Guidance Document anyway: come up with some ways to help companies, "how would you assess your vulnerability, how would you look at your company and what kinds of things should you be looking at based on the type of product you produce, the size, where you hire your people," actually give not only a guide to security but a guide to how you develop a plan.

DR. MACZKA: Right, and we wanted to do that, actually FDA and I have been talking about actually developing a course, it would be Web-based, and then there's this -- one that you could interface, but the course would be given -- we have a top-down/bottom-up approach. The top down would be: to reach out to different associations and say: we want to teach you about this methodology for identifying vulnerabilities and meet with the (inaudible) associations. That was one thing we both agreed that we would do, some together and some separately, because we have different, you know, products.

But then the bottom-up approach was, really: to try to reach out to the local -- at the local level, to local industry too, to local school food authorities, to state governments, that kind of thing, and to actually train, not necessarily how to do your own vulnerability assessment but the kinds of risk factors that you want to be aware of and, you know, the kinds of vulnerabilities you want to be aware

of.

Because it's too resource-intensive to try to teach them how to do a (inaudible) analysis, it just would take an enormous amount of time.

DR. HOLLINGSWORTH: Well, and I don't -- yeah, I agree, I don't think I'm looking for something that detailed, as much as: assess -- I mean, the vulnerability assessment will be done at a different level, you're right, but then you give that -- or you give instructions to a company, "How do you use that information now, do you make these products, what do you do" -- "do you know your employees, where do you hire your employees, that's something that's a vulnerability for you."

MR. SCHAD: Jill, are you talking about something like a checklist or something, so you don't miss anything when you're doing your assessment or --

DR. HOLLINGSWORTH: Well, I think it would be almost a guide, for "What are priorities when you're doing your own assessment and what's applicable to your company" --

MR. SCHAD: Uh-huh.

DR. HOLLINGSWORTH: -- "based on what you do and how you do it?" If you're a processor, you're not going to be worried about, for example, the introduction of live animal diseases into your facility.

MR. SCHAD: Uh-huh.

DR. HOLLINGSWORTH: If you're a slaughter plant,

you have a whole other component you better be worrying about, and that's live animal disease issues. So I think that a guide to "how do I assess, as an individual plant owner, what should I be doing, are there things I should be thinking about," not necessarily just mandating a plan.

DR. MACZKA: (Inaudible.)

DR. HOLLINGSWORTH: I think the mandating a plan is -- everyone will do it if you tell them they have to --

MR. SCHAD: Uh-huh.

DR. MACZKA: Right.

DR. HOLLINGSWORTH: -- but it doesn't necessarily mean that they feel that they've done the right thing for the right reasons and worked with the government to get -- and again, my big concern, looking again at the higher level, is not just a plan, but if there is the crisis, are we really prepared to pull together and do something about it.

Now, I'll give you an example of the thing that we talked about a lot at the retail level, that's our biggest fear. It would only take one well-placed e-mail or some kind of leak to the media that sounds credible that could bring the entire food sector to its knees, and we've always used the example of: if someone said there's one box of cereal out in the marketplace and if a child ate one bowl of that cereal they would drop dead, I guarantee you we would not sell cereal for months and months and months. The repercussions of that, it's not just the cereal, now we've

got the entire agricultural grain industry coming to its knees because of an e-mail or fax.

UNIDENTIFIED FEMALE: Right.

DR. HOLLINGSWORTH: And so it's that kind of raw picture that we're trying to look at to protect the food supply.

MR. GOVRO: I want to throw an idea out there, I don't necessarily advocate this, but you can prop it up or shoot it down, whatever. As I've thought about doing self-assessments and writing a plan, and if an agency put a requirement for the plans in place, there would have to be some criteria for the plant, you know, it must address this, that, and the next thing, and then someone's going to have to look at that plan, on the USDA side, and decide whether or not it met the test, and I'm just wondering if it might save a step if the Agency simply did the assessment.

DR. MACZKA: Of each and every plant?

MR. GOVRO: Uh-huh. They're going to have to do it anyway; right?

DR. MACZKA: I guess so, because if they eventually -- if they were to mandate a plan, then somebody has to evaluate it, like you said.

MR. GOVRO: Right. It would be their own assessment [phonetic].

DR. HOLLINGSWORTH: I think, Carol, you know, the thing you had mentioned even about the outreach and the

training, I think one of the hottest sellers would be if there was like a CD-ROM or even a Web-based training that would actually take a company through --

DR. MACZKA: Right.

DR. HOLLINGSWORTH: -- "How do I determine if I'm doing what I should be doing for security?"

DR. MACZKA: And we (inaudible) Web-based (inaudible), and then we were going to do some face-to-face, because some people get really alienated, at least I do, when somebody says yes on Web-based training, I go ooh, I don't really want to look at that, but if I had some face-to-face, that would be good too, and -- so that was part of the plan, this local outreach thing, and then I told you about the top-down approach.

DR. HOLLINGSWORTH: There's also been some tabletop exercises, there's been two of them that have been done, that I'm aware of, one in the state of Maryland --

DR. MACZKA: Right.

DR. HOLLINGSWORTH: -- and the one in Michigan, where they actually came up with a scenario of a security issue --

DR. MACZKA: Right.

DR. HOLLINGSWORTH: -- and they brought in the first responders and -- everybody, all the players, and they have been -- the first one, in Maryland, was pretty good, the one in Michigan got even better. I'm told that --

DR. MACZKA: Yeah.

DR. HOLLINGSWORTH: Were you there?

DR. MACZKA: No, but --

DR. HOLLINGSWORTH: I heard there were 200 observers just watching how that worked, to see, "God, could I have done this better or what" (inaudible).

DR. MACZKA: Two of my staff members were there. But one of the things we did is we have a co-op program here, I don't know if I want to call it program, but -- and we actually had -- worked together with NASDA, at least -- we're in the working phase of this, but putting together one of these co-op agreements that -- to do sort of like an incident system, like say an episode happened in the state, how would you respond to the federal government, how do the state, the locals, respond to federal government to address that incident, and so that's called incident command training, and that's something that I really think needs to take place throughout the country, actually.

DR. HOLLINGSWORTH: Well, there's -- actually, there's been a grant that's just been submitted for money to be able to do one of those tabletops in every state, so that would be -- and it's been interesting, I mean we've really learned that -- especially in both instances, there's been one point where the system crashed, and that was the interface between the industry and the federal government, FDA, USDA, even CDC department, everything was going great,

then you bring in these first responders, who no one has ever worked with, and suddenly they have police and FBI agents taking over their investigation, and the whole thing started to fall apart, because they've never worked together. And so that was one, really, good lesson (inaudible), and everyone's now working on how do we fix that disconnect, because it's a big disconnect.

DR. MACZKA: See, what you're really honing in on is like not -- well, not coming up with these plans, but other ways to tackle the problem, to be more effective, maybe, which is, you know, how do we respond to an incident, how do we get people's awareness raised?

DR. HOLLINGSWORTH: Yeah, those things on that list, that's a great list. And I guess when I looked at that list, one of the things, to me, is that what's not there is: regulating specific must-dos, it's really a collaborative approach.

MR. KOWALCYK: To add to the point of this whole assessment and FSIS assessment, I think it's important to have that collaboration at this point, because before you got ever to the point of implementing rules, I think it would be very valuable to have the industry do a self-assessment, either with -- have FSIS do it or through their guidance, so that certain things are addressed in each self-assessment, and that way you can also look at smaller producers, like Mark's company, and then the bigger producers, you'll know

the issues that each group faces, and then if you ever got to the point where it was felt that it was needed to implement rules, at least you would have that information, as to where industry was lacking with respect to security, where some of the players in the industry did a much better job, or maybe you could say, Okay, here, Company ABC is doing this, and this type of a plan, maybe not mandate it but say, Okay, this is what they're doing, this should be the industry standard, how do we get there.

So I think recommending a self-assessment by plants with at least FSIS guidance so at least the same points, and they can be based on employer ability analysis, points that are seen as very critical to the security required, that those are addressed in the self-assessment, so that way you get --

MR. HICKS: Yeah, with (inaudible) program we developed a document (inaudible) program of self-assessments, and then we did on-site reviews (inaudible) certain number of on-site reviews every year, and in that (inaudible) very good questions (inaudible) certain things, and (inaudible) that there's a certain benefit to going that way because it encourages people to (inaudible) self-assessments the right way (inaudible).

DR. MACZKA: But there's no -- there's no reason that industry would want -- would have to participate in self-assessment. I mean, I like the idea, I think, of two

responsible parties coming together and saying, Let's collaboratively work together to do a self-assessment, so it's a good idea, but there are always good actors and bad actors, and what about an industry that says, No, I don't feel like doing that, what would be your -- so you do it on some and not all? I mean -- you know what I'm saying?

MR. GOVRO: Perhaps we could take a moment here and review the information that Mr. Tynan provided from the meeting a year ago. There were four questions asked of the Sub-Committee at that time.

The first is: "How can the Agency improve food-security awareness by the industries?" The second is: "Should FSIS engage industry in consumer associations to assist in this effort?" Number 3 is: "Should FSIS provide joint training for inspectors and industry?" And Number 4 is: "Should FSIS mandate that plants have a food-security plan?," so that actually was the question, "If so, should this apply to all plants or should some be exempt?"

I'm going to read the answer to Number 4, because that's the question we're dealing with right now.

"At this time the Sub-Committee does not believe FSIS-mandated food-security plans are the proper way to address food security. Food security is a concept that lends itself more to collaborative efforts by government and industry rather than a regulatory approach at this time. To be enforceable, regulatory mandates need measurable outcomes

and defined objectives, which are not evident in the area of food security. It is difficult to see how an establishment or FSIS would measure the success of a food-security plan. Security threats and vulnerabilities are not well-defined, nor are their relative risks clearly understood. Absence of an incident does not constitute a successful security plan. In addition, the Sub-Committee at this time does not see a one-size-fits-all approach being useful to prevent security threats, which may differ greatly depending on the product location, distribution, or establishment size. The Sub-Committee believes all plants have a food-security responsibility, and the Sub-Committee does not foresee exemptions from this responsibility."

DR. HOLLINGSWORTH: (Inaudible.)

MR. GOVRO: We were really close.

(Laughter.)

DR. BAYSE: If there's no plan, how do you know if (inaudible)?

MR. GOVRO: It said that not -- no one is exempt from the responsibility of food security.

DR. BAYSE: But how do you (inaudible)?

UNIDENTIFIED MALE: I don't know that [phonetic].

DR. HOLLINGSWORTH: The question was: should anyone be exempt? Although I [phonetic] -- no, you can't just across-the-board say these people have to do it and these don't, so the idea was having a collaborative approach

that would include everyone and not exempt anyone.

DR. BAYSE: I guess maybe I didn't put the question -- how do you track what's (inaudible)?

MR. GOVRO: Well, I think the Committee came to the conclusion that it wouldn't be a good idea to try to measure the success of these (inaudible) because it would just be too difficult to establish the objectives that would measure success.

DR. MACZKA: But there are things you can measure, like -- I mean, and I think the vulnerability assessments tell us that, like you can measure -- "Do you" -- it's like your -- "Can people just come in and out of your plant? Do you have good physical security? Do you have good physical security around physical nodes?" You can look at that, you can say, "Well, no, there's a big open" (inaudible) "in there, anybody could throw something in," you know.

I mean, there are things that you can look at that are clearly vulnerabilities and you can see if there are protective measures in place, whether it be personal, just being able to run around in a plant, or if you have physical protection of certain critical areas, like your storage areas, where you store a lot of raw or dry ingredients. I mean -- so I think there are things that definitely represent vulnerabilities that you can be checking. I mean, to say that there's no measure -- I mean there's no -- there's no success measures, like, you know, "Did I prevent an incident

from happening today?" Well, you know, you can't use that as a measure, but you can look at vulnerabilities and whether you've taken protective measures.

DR. HOLLINGSWORTH: I think the -- part of the problem is we are probably primarily food-safety-oriented and we're looking at food-safety programs and maybe too often trying to compare them --

DR. MACZKA: Right.

DR. HOLLINGSWORTH: -- and I think to the point that both you and Mike have just made about assessing success, that in fact it is reduction of illness that we use as the measure of success in food safety.

DR. MACZKA: Exactly.

DR. HOLLINGSWORTH: And the point is, we don't have that for security.

DR. MACZKA: No.

DR. HOLLINGSWORTH: And I think it's a struggle, for those of us who are used to those measurable outcomes --

DR. MACZKA: Right.

DR. HOLLINGSWORTH: -- "Are we protecting the public? We know we are because we're doing things to be sure that they don't get sick." It's a very clear goal, it's a measurable objective, and it's kind of what drives us.

DR. MACZKA: Right.

DR. HOLLINGSWORTH: We're sort of not -- we don't have that here, and I think it makes it hard for us, as --

certainly for people like myself, who are always focused on a measurable (inaudible) kind of outcome --

DR. MACZKA: Right.

DR. HOLLINGSWORTH: -- how do you measure it?

DR. MACZKA: I think that's a very valid point, but I do think there -- as I -- well, I (inaudible) repeat myself --

DR. HOLLINGSWORTH: But that's not to say you can't do things that are visible, "I have done this, I have employee screening" or "I have a fence around my premise," but I think that's where the self-assessment idea comes into play.

MR. SCHAD: I talked about my establishment at first, and I just was explaining my establishment, I wasn't looking for an exemption on my establishment or something like that. I mean, I think I could still do a self-assessment and maybe the statement, but I don't think that would be too much to ask of a very small processor, to make that self-assessment, to say, "My doors are locked at all times, I have a security system when I'm not there."

Another issue I think has to do with very small processors is the lack of visibility. I mean, not that I can think like a terrorist, I'm not going to say that, but isn't a terrorist going to go over a --

UNIDENTIFIED FEMALE: (Inaudible.)

MR. SCHAD: -- large-volume operator, I mean if he

takes out Schad Meats he's not going to make front-page news, right?

MR. GOVRO: And I think that's part of what industry is afraid of, is that there's going to be a whole set of rules that are going to say, You have to a plan and you have to do all these things, and regardless of whether or not it's applicable to your operation, you're going to have to go out and do this thing, which is going to cost you \$50,000 to put a fence around your perimeter --

MR. SCHAD: Uh-huh.

MR. GOVRO: -- or something like that, and rather than do that, somebody's just going to lock their doors and say never mind [phonetic] --

MR. SCHAD: Uh-huh.

MR. GOVRO: -- and I don't think anybody wants to see that.

MR. SCHAD: And I think your point about HACCP is a good one, Mike, because it all started out with "This is your plan," you know, every establishment is different, but to then come in and say, "Well," you know, "this is a hazard in your operation" --

MR. GOVRO: Uh-huh.

MR. SCHAD: -- "here, here, and here, you need a CCP here," you were (inaudible) being told that. So I agree with you on your concern there, we don't want to get to that point.

MR. GOVRO: And I guess that would be the question I would have, if we did -- if the operators did a self-assessment and FSIS personnel did their assessment and they didn't match and the operator said, "I don't need to build a fence around that," you know, "you've got to cross 50 miles of swamp to get to it, why do I need a fence back there," and the FSIS guy says, "Because it says you've got to have," you know, "some external security," and what do you do to resolve those differences, and where are we going.

I think it would be a good exercise for every operator to stop and look at his operation and think about where he might be vulnerable. I'm reluctant to say we should go beyond that.

MR. HICKS: Yeah, I would think that it wouldn't be that prescriptive, that whether it be guidelines or something that's mandatory, that you (inaudible). I think that the real thing [phonetic] folks want to see happen is to make sure people ask themselves the question "Do I need" (inaudible), "am I secure enough, how can I make myself secure enough," so that (inaudible) anybody says, "Why didn't you do something," if this does happen.

So I agree with you. (Inaudible) has -- and our folks (inaudible) doing evaluations and audits, and I tell you, I wouldn't want them to go out there, saying, "You've got to have a fence," "You've got to have two locks on your door, you only have one lock on your door and that's not

enough" --

UNIDENTIFIED MALE: Uh-huh.

MR. HICKS: -- that would be a nightmare, but I think trying to make sure that -- as you indicated, how do you know people are asking themselves the questions and -- I think that's the kind of guidance that we (inaudible), not something that's prescriptive (inaudible).

MS. ALBERTSON: If the Department was to do this (inaudible) and there were vulnerabilities identified, would it be fair to then require that you must implement some measures to address those vulnerabilities that you've identified?

MR. GOVRO: That's the heart of the matter right there.

(Laughter.)

MS. ALBERTSON: Again, not to be prescriptive, but just to say, "We've identified something, you must take action."

UNIDENTIFIED MALE: (Inaudible.)

DR. HOLLINGSWORTH: Well, I think that we also need to be careful that -- again in the area of food security, that we don't create a monster here or have unintended consequences, and that is, if you make it such a problem for a plant that they either do a paperwork exercise or they come up and say, "No, I don't have any vulnerabilities," "Because if they say I have one, then you're going to mandate that I

do something, so I'm just going to say I don't have any."

UNIDENTIFIED MALE: Yeah.

DR. HOLLINGSWORTH: So I just think we need to be careful, again, about why we're doing this and what we hope to gain from it.

I guess another thing too that -- I think it sounds sort of like Mom and apple pie here, but when you think that security -- I'm assuming that in most cases we're thinking there is some evil person or group out there trying to do something, some type of a terrorist act or something intentional, and I think that it doesn't serve us as a country well if the message is we've got our industry and our government -- I hate to use the word "fighting," that's too strong, but maybe not working together, the government making the copies do something. I think it sends the wrong message.

You know, again, Mom/apple pie approach, I think the message to the outside world needs to be: together the industry, the government, and the public have an interest in protecting our infrastructures, and in this case food, and we work together to achieve that, through training, through assessments, through sharing of information. I think that to the outside world that needs to be the message.

MS. ALBERTSON: May I also make another observation?

MR. GOVRO: Sure.

MS. ALBERTSON: Another aspect of this, and I'm sure you're all aware of, is -- and a protection measure, is to maintain the competence of our food supply, public confidence. I was reading today that in China they have so much problem with (inaudible) and adulterated product that babies are dying and being deformed by (inaudible) and the government is saying, "We've lost control of everything, we can't control all these vendors that are selling these things on the market," and people are now scared, they're scared, "What can I buy? I don't know if it'll kill me, kill my children," you know, whatever, "not help me," and, you know, a counterfeit drug that actually has nothing in it that's going to help you, and you could pose it that: here's a scenario that -- so beyond the terrorists, I target smaller plants, different products, multiple locations, I've got people getting sick, getting killed, and now nobody knows what to eat or not to eat because it's all across the country, different places, different marketplaces, and different food products, and I don't know if I eat the cereal -- maybe that's the next thing that's going to make someone sick, or if I drink the orange juice, or whatever.

So if public -- again, going back to maintaining public confidence, if we say: well, I didn't see a vulnerability in my establishment, therefore I didn't take any actions, is that going to help maintain that public confidence, you know? And again, I'm just throwing thoughts

out here, and what I'm trying to look for is -- you know, the Agency and the industry is going to have to step up to the plate and answer these questions, what is -- what (inaudible) be done, both -- all of us, you know, and we say, Well, you know, we didn't -- we didn't require any of this because, you know, we wanted to keep it (inaudible) -- you know, we lose some face there, and then the industry says, Well, we didn't see the need for certain plants because "this" reason, I just don't think that's going to help us build -- rebuild or maintain the public confidence.

So what do we do, how do we address that? If you were to pose the question after an incident, how would you respond? And then you need to go back to: let's hope we don't have to respond, other than to say, We did do something, so what would we have done? Let's play the Monday morning quarterback game now.

DR. MACZKA: See, I think the word "collaborative," you know, like something people don't believe in, you know, and if we could put more teeth into the word "collaborative," like what it really means, what is it really going to mean to work together, then maybe, you know, that should not be -- if we could put teeth on that, to say -- to get confidence, the confidence of the public, but I just don't want to throw out the word "we'll collaborate," let's make it mean something. It doesn't have to mean mandating a security plan, but it has to mean more than just using that word.

UNIDENTIFIED FEMALE: I agree.

MR. HICKS: This may be semantics, as Mike said earlier, but (inaudible) saying creating a partnership toward a certain end (inaudible) may carry that kind of commitment and --

DR. MACZKA: Creating a partnership, I mean like a documented one or --

MR. HICKS: Well, no, just -- in saying that the industry and Agency and whoever else (inaudible), create a partnership towards making sure that security -- security efforts are in place, and rather than saying we're going to be collaborative, you're right, that's kind of a word that can be thrown around and not really mean anything. We're talking about in terms of creating a partnership (inaudible) way of (inaudible) more of a commitment to getting it done as opposed to just talking about it.

DR. MACZKA: You know how we develop all these MOUs, we've been developing MOUs with TSA and Customs and -- maybe we need to develop an MOU -- I mean, I don't know if there's such a thing: an MOU with industry, where, you know --

DR. SANTIAGO: Well, it could be (inaudible) collaborative efforts --

DR. MACZKA: -- which -- based on milestones or something.

UNIDENTIFIED MALE: Dr. Santiago.

DR. SANTIAGO: I agree with you, I think it has to be communicated how we are working together on this, not each one trying to see which one has to do it or not to do it.

MR. SCHAD: Dr. Santiago, you were telling me before about talking with trade organizations about this.

DR. SANTIAGO: Yes.

MR. SCHAD: Did self-assessment come up in those conversations?

DR. SANTIAGO: I was telling Mark earlier, when I worked on the guidelines, my first assignment when I came to D.C. was work (inaudible) on the guidelines. The first thing I did was talk to the different plant owners, big ones, small ones, medium-sized, and of course the trade associations, but surprisingly, some of the very small ones are very, very sophisticated (inaudible), all those things, and the big ones, because they have outside security, that's (inaudible), that "Nothing's going to happen here, we're very secure in our operations." This is where the trade associations came in and started filling in -- giving us feedback on what should be we are addressing. That's why we have those (inaudible) areas in the guidance.

MR. GOVRO: I might suggest at this point that what I'm hearing here is that there's not a lot of consensus for making a requirement for plants to have a specified food-security plan but we are -- we seem to be talking a lot about the assessments and there seems to be some agreement that it

would be a good idea and feasible for an assessment to be done in each plant. Have I stated that correctly so far or have we just not heard the other viewpoints?

MR. KOWALCYK: I think an assessment is a good place to start, because food security is such a general topic, I mean we're talking about security of the physical plant, but then we're also talking about the integrity of the food product, and I'm wondering if there are issues of immediate concern that should be addressed that are already being addressed with the current system.

A good example would be: making it so that plants and FSIS are able to trace back product that is found to be contaminated, either unintentionally or intentionally, in this case, to me that seems like a very -- a part in the system that is very troublesome. (Inaudible) the OAG [phonetic] report from the ConAgra recall, there was problems with trace-back. Now, God forbid we had someone contaminate a large lot of meat that goes out, the ability of getting that back, to me, would be, you know, very critical, to limiting the extent of that problem.

But food security as a whole, I mean, we're talking about the security of the physical plant and then the integrity of the food product. Do we need to -- I mean, does this need -- do there need to be separate recommendations based on that? I mean, physical security is one thing, and a self-assessment is a good idea, because if plants are doing

what they can to maintain the integrity of their physical location, then you would think that the likelihood of potential contamination would be reduced significantly, because you wouldn't have somebody coming into the plant to -
-

DR. MACZKA: Well, that's not exactly -- the employees can be terrorists themselves --

MR. KOWALCYK: Sure.

DR. MACZKA: -- you know, I mean, they can infiltrate the work force, and so when we say physical security, I would like to move from the perimeter into the plant and actually look at places and ensure the physical security of critical nodes or critical production areas. So, you know, I mean, I think that is something we learned from the vulnerability assessments, that, you know, just don't sit there worrying about the perimeter fence, go inside and look where somebody can infiltrate the plant and cause damage.

MR. SCHAD: You know, Carol, I understand your concern, but when you say that, I can see us going down the road (inaudible) when you say that, that's what bothered me with that.

DR. MACZKA: Well, but if it was a self-assessment, where together you say, "Now, don't forget to secure that combo" [phonetic] "bin" or something like that, I mean, again, I'm not sort of advocating, you know, a mandatory plan, but we should at least raise awareness about where

adulteration episodes could have the greatest effect and where the greatest vulnerabilities are. I think that is something this collaborative or cooperative -- or whatever -- thing we do with industry should do.

DR. BAYSE: In terms of the self-assessment, I'm just thinking, suppose we go that route, in the larger plants for sure you've got this issue that you just sort of alluded to, the turnover of the personnel, and so there's going to have to be -- there's going to need to be some sort of timeline, every -- I don't know how often, do you re-assess every time you hire someone, you know, that just seems --

DR. MACZKA: That's too expensive to do. That's why I keep on saying like instead of doing that, instead of assessing the whole -- doing background checks on your whole workforce, look at the places in the plant and the people working around those critical places --

DR. BAYSE: Okay.

DR. MACZKA: -- and make sure those people maybe have background checks or you know who they are, you know.

DR. BAYSE: I just don't see how to put that into -- into the whole process that we're doing.

DR. MACZKA: Some plants actually have color-coding on the gowns of people that work in critical areas, you know, they've actually -- they wear a red gown or something, you know, when they're in a critical area, so "those people can be in that area," that kind of thing.

DR. HOLLINGSWORTH: Yeah, but actually those are critical safety areas, they're not necessarily the same as critical security areas.

DR. MACZKA: Right.

MR. GOVRO: What I was going to suggest is that we recommend that an assessment should be done on every plant, and whether -- we can hash out whether that should be done by the plant or should be done by FSIS or should be done collaboratively. I think just the act of having -- going through the motions of each plant -- not going through the motions, but actually go through those steps and gather the information would be useful and --

DR. HOLLINGSWORTH: I tend to agree, but again, I think we have to be careful about the wording, because FSIS is a regulatory agency, and so the question is: so what if someone doesn't do one? I just caution us to be careful of the wording. Whether we're saying FSIS should require a plan or FSIS should require an assessment, you've got all the same questions and issues.

MR. SCHAD: I think you brought up a good point, Jill, because then in a sense we may -- some people may interpret it as mandating --

DR. HOLLINGSWORTH: Right.

MR. SCHAD: -- a security plan.

DR. MACZKA: Could that be where we put in maybe this incentive, though. Like we said, every plant should do

an assessment. Now, if a plant decides not to do an assessment, if the code was raised from orange to red, well, that plant, who decided not to do an assessment, we'll make sure that we send inspectors there to watch over them during a code red or something, you know -- you see what I'm saying?

DR. HOLLINGSWORTH: Yeah.

(Laughter.)

DR. MACZKA: You don't like that one, huh?

DR. HOLLINGSWORTH: What, are you going to have a list of red plants and orange plants?

MR. KOWALCYK: Well, that -- my concern with that is, when you have a condition like that, you're diverting resources away from what they otherwise would have been doing.

DR. MACZKA: And you obviously can't do that, you'd have to put more resources on it. Is there any way for an association to bear pressure on plants or establishments to actually do the self-assessment?

MR. SCHAD: I'm on the board of the American Association of Meat Processors, so -- we never -- we make strong suggestions, we never say "to be a member of this organization, you have to do this," but do we make strong suggestions on several things, like holding product when you're sampled, you know, that's one thing, so --

DR. MACZKA: Maybe that's enough --

MR. SCHAD: We can send a message.

DR. MACZKA: -- maybe that's enough (inaudible).

MR. SCHAD: We can send a message.

DR. SANTIAGO: (Inaudible) Number 4 is to encourage self-assessments.

MR. SCHAD: And members are more receptive to suggestions than mandating, and I think the self-assessment would be more meaningful -- and I think that's part of human nature -- be more meaningful if you're doing it and you've got a feeling, "I'm doing a good thing for" --

DR. MACZKA: Right.

MR. SCHAD: -- "my business and for my customers," than the government saying you have to do it.

DR. SANTIAGO: Especially if it's coming from the industry associations, maybe they're more receptive to that.

UNIDENTIFIED MALE: Yes.

UNIDENTIFIED MALE: Yes.

DR. BAYSE: You need to do some motivational speaking. I think the security is obviously something nobody's going to deny, that we all have these background concerns about -- maybe not background, but concerns about that. I mean, how could anyone not be concerned about security? In some ways I think we're having still trouble separating food security from food safety, but they really are different, we're just struggling with how to -- but yeah, I think that's a great idea, for the trade associations to (inaudible) --

DR. SANTIAGO: (Inaudible) different (inaudible) collaboratively, we can say something -- like robust collaboration (inaudible) --

DR. BAYSE: Or encouragement by industry --

UNIDENTIFIED MALE: Stakeholders?

UNIDENTIFIED FEMALE: Yeah (inaudible) --

UNIDENTIFIED FEMALE: -- by associations --

DR. SANTIAGO: -- encouragement of (inaudible).

UNIDENTIFIED FEMALE: By associations --

UNIDENTIFIED MALE: Stakeholders as well.

UNIDENTIFIED FEMALE: And stakeholders.

DR. HOLLINGSWORTH: If it was really creative, if they could come up with something like the FSIS Security Partnership, FSIS Industry Security Partnership, and you could even have a little program in place that would say, you know, "Be a part of the security partnership, and to be a part of the partnership, these are the things we're asking you to do: self-assessments, download or buy or request one of our CD programs to use as your guidance, do so many hours of training, I don't know, you could come up with some things that the industry could do to be a part of the team, and you could even maybe set it up so that industry could respond back and almost like sign an agreement:

"Yes, I want to be part of your team, I've done these things," and at some point you could announce that out of, I don't know, 7,000 plants, 5,000 have joined the

security team, the incentive would be -- people would be embarrassed into wanting one of those little certificates.

MR. SCHAD: I better go on the bandwagon here.

DR. HOLLINGSWORTH: Who wouldn't want a little -- and actually it could be (inaudible) --

DR. MACZKA: And actually it could be worse, because people would not only be embarrassed but it could be that people with supply -- the suppliers who haven't joined the team, people wouldn't get product from that supplier.

DR. SANTIAGO: Yes, market pressure.

MR. GOVRO: And this goes back to the third-party (inaudible) sort of thing, and industry loves it, in particular countries that we export, to -- love it when there's a government seal of approval for something, if you were to make this voluntary, you know, "You will get Food Security Designation Number 1, if you," you know, "do these three" -- you know, "do the self-assessment, you address the vulnerabilities, you," you know, "have a plan in place, you take the training," whatever, "you get this stamp of approval," I think people are going to be flocking to it.

DR. HOLLINGSWORTH: I think FSIS could actually set up -- if this is true, a partnership, is that -- who was using that? -- was that -- you were talking about this partnership, that you could almost, in addition to having some incentives to join, make it that, you know, "If you want to be a member of the team and you're not sure," you know,

"here's a way that FSIS can help you" --

DR. MACZKA: Right.

DR. HOLLINGSWORTH: -- and offer assistance to those companies, and even reach out to the trade associations, where maybe they would want to, at one of their meetings, where they have 30 or 40 of their members, invite FSIS to come in and explain to them how they can become partners and what they have to do to be a partner.

DR. MACZKA: Yeah. I actually like the idea.

UNIDENTIFIED MALE: Yeah.

DR. SANTIAGO: I'd like the award for (inaudible), that we're coming to a --

MR. GOVRO: Let me read Question Number 1 and the answer that that Sub-Committee gave one year ago, "How can the Agency improve food-security awareness by the industry?":

"The Agency should assess the level of awareness by industry to determine if it needs to do more. The Agency should either attempt to accelerate the OMB clearance for such a survey or make those determinations using FSIS internal resources when doing food-security inspections. FSIS should also utilize industry organizations. Agency could provide other types of training on food-safety issues, such as recall preparedness, that could improve industry's awareness of the need to implement food-security measures. The Agency should look for opportunities to tie the food-security message into other food-safety training. This could be done in-house or

in coordination with organizations. Given that the two Food Security Guidance Documents provided by FSIS have been reviewed with each plant, another question might be: How can the Agency assure that every plant dedicates the appropriate level of resources to food security? This will require the Agency hone its message about the threat of bioterrorism and make industry understand the importance of bioterrorism prevention and response preparedness. The Agency should work with other government agencies and industry groups, states, locals, FDA, CDC, FBI, EPA, OSHA, and industry organizations to be prepared to respond to a food bioterrorism event" --

DR. MACZKA: That's a good one. It gets back to incident command system.

MR. GOVRO: -- "conduct multi-agency tabletop exercises and include interested industry members, coordinate with other agencies and industry groups to gather good ideas and avoid reinventing the wheel, continue to reach out to other agencies and industry organizations to establish good contact information and working relationships."

So a little bit of what we'll -- what we've talked about here today.

DR. HOLLINGSWORTH: The thing -- the partnership approach too, especially if you can get copies to either sign up or somehow respond, then you would in fact have something more of an assessment than what you have now, as far as have companies done something.

DR. MACZKA: Right.

DR. HOLLINGSWORTH: Right now there is no way to measure that. Because if you went and asked -- if you sent out a survey right now saying, "Have you done an assessment for security," everyone's going to answer "Yes."

DR. MACZKA: -- say "Yes." Right.

DR. HOLLINGSWORTH: They've done something, you know, they went out and looked and went, "Yeah" --

UNIDENTIFIED MALE: (Inaudible.)

DR. HOLLINGSWORTH: -- "looks good, I've got screen on those glass windows, so yeah, I'm safe." So I think that it would at least give you something to maybe have as a measurable criteria.

MS. ALBERTSON: Mark -- Mark or Mike?

MR. GOVRO: He's Mark, I'm Mike.

MS. ALBERTSON: Would this -- you're a small -- very small plant, it sounds like.

MR. SCHAD: Yeah.

MS. ALBERTSON: Is this incentive to you?

MR. SCHAD: Yes. Oh, yes, it is.

MS. ALBERTSON: Okay. Because that's, I think, the largest audience for us, is the small and very small plants, and that's a big challenge, is what's going to be the incentive to get them motivated to do something --

MR. SCHAD: Yeah. That's one reason why we always try to be pro-active, because it's always -- it's also good

for business, so you can --

MS. ALBERTSON: So the marketing tool aspect of this is a big -- the big draw.

MR. SCHAD: Oh, definitely, oh, yeah.

MR. GOVRO: And this appeals to you, this --

MR. SCHAD: Uh-huh.

MR. GOVRO: (Inaudible) sort of voluntary thing.

MR. SCHAD: Uh-huh.

DR. HOLLINGSWORTH: And I think it goes for retailers too, especially for the big retailers, because they like to -- you know, "We select our suppliers based on these criteria," and it would be nice to see it based on the fact that they've joined this security partnership.

DR. MACZKA: You know, Customs has this thing called CTPAT [phonetic], I think you're probably aware of it, and basically, people who import -- Karen Stuck could probably explain this better, but people who import products to the United States, if they -- I guess it's brokers and -- who -- you know, if they can show that they've done certain -- followed certain security measures, they become a member of this CTPAT, and it's then -- so now we refer to this list as the List of Good Actors because they met certain food-security -- they met certain food-security guidelines. And so, in a way, it's, you know, kind of talking about something very similar, this List of Good Actors.

DR. HOLLINGSWORTH: Yeah, so it's really a positive

incentive, as opposed to a negative --

DR. MACZKA: Right.

MR. GOVRO: Uh-huh.

DR. HOLLINGSWORTH: -- where, you know, "We're going to put you on the" (inaudible) "list."

Thank you, Robert. That's clear as a bell.

(Laughter.)

MR. GOVRO: Shall we go with this recommendation, for a collaborative approach with some sort of a voluntary certification based on standards to be determined by the Agency, or perhaps Agency in collaboration with the district?

DR. SANTIAGO: Yeah, we're going to give you some guidance" and (inaudible) "we're going to do the assessment," maybe [phonetic].

DR. MACZKA: Yeah, I like that. So an FSIS industry security partnership where industry is encouraged to join even through maybe associations encouraging them to join, and they have to meet -- together, they do this assessment together?

UNIDENTIFIED MALE: Uh-huh.

MR. KOWALCYK: I would think FSIS guidance would be very important, so that way it's consistent.

DR. HOLLINGSWORTH: Have you seen this thing, Carol (inaudible)?

DR. MACZKA: I did, I was at that last meeting, the last ISAC meeting.

DR. HOLLINGSWORTH: All right.

DR. MACZKA: I gave a little presentation.

DR. HOLLINGSWORTH: Okay. And you've seen the list -- oh, that's right, the one that was over at the --

DR. MACZKA: Yeah, the one with --

DR. HOLLINGSWORTH: You've seen the list, then, of the organizations that have signed (inaudible)?

DR. MACZKA: Right.

DR. HOLLINGSWORTH: It's an extensive list of -- a great outreach (inaudible).

DR. MACZKA: Yeah.

DR. HOLLINGSWORTH: If anybody wants to look (inaudible) picture here, I can tell you what it says, even if you can't see it. What these boxes are are a breakdown of all of the food and agriculture subsectors, so there's live animal production, farm production, live animal processing, plant production, meaning grains and fruits and vegetables, there's transportation, there's restaurant, retail --

DR. MACZKA: Processing -- Manufacturing and processing is in there, I believe. Right?

DR. HOLLINGSWORTH: Well, there's two processing, there is processing for animal products and then processing for plant products. And transportation is one. In fact, if you read these, it'll tell you what they are.

UNIDENTIFIED MALE: Okay.

DR. HOLLINGSWORTH: Plant production, animal

production.

UNIDENTIFIED MALE: Okay, yeah.

DR. MACZKA: You know, and really what would be nice, if this was sort of like a press release, where you're announcing, "FSIS and industry" --

DR. HOLLINGSWORTH: Yeah, announce there --

UNIDENTIFIED MALE: (Inaudible.)

DR. HOLLINGSWORTH: You know, in many ways -- although it's very different, I hate to make the comparison because they're very different components, but the whole idea of the fight-back thing was heavy advertised as one of the few, at the time only, joint industry/government partnerships where everyone had one goal in mind, one objective in mind, and everyone agreed to the message, and it could be very much the same (inaudible).

DR. MACZKA: Yeah. We could even give that, maybe, as an example, as to some things that we're mimicking --

DR. HOLLINGSWORTH: That partnerships work and they can be done.

DR. MACZKA: Yeah. I think one point that came out of this, and I'm glad to actually hear it: that food safety and food security are different beasts, because I think too often we keep on talking about just incorporating it into a HACCP plan, and I did not actually agree with that idea, so -
-

DR. HOLLINGSWORTH: Well, there are things that --

they're different and there's this gray area where they overlap --

DR. MACZKA: Yeah.

DR. HOLLINGSWORTH: -- and -- but they are different.

MR. GOVRO: I started putting a little bit down on the screen here, and maybe we should go to the other computer to --

DR. MACZKA: Who's going to do that?

MR. GOVRO: Who's got the fast fingers?

UNIDENTIFIED FEMALE: I will.

(Whereupon, at 6:00 p.m., the sub-committee meeting was adjourned.)

* * * * *

CERTIFICATE

In Re: NATIONAL ADVISORY COMMITTEE
ON MEAT AND POULTRY INSPECTION MEETING
STANDING SUB-COMMITTEE NUMBER 3
Place: ALEXANDRIA, VIRGINIA
Date Held: JUNE 2, 2004
Time Held: 2:45 P.M.

We, the undersigneds, do hereby certify that the foregoing pages, number 408 through 469, inclusive, is the true, accurate and complete transcript prepared from the reporting by BOB ADDINGTON in attendance at the above-identified hearings, in accordance with applicable provisions of the current USDA contract, and the below-signed persons have verified the accuracy of the transcript by (1) comparing the typewritten transcript against the reporting or recording accomplished at the hearings and (2) comparing the final proofed typewritten transcript against the reporting or recording accomplished at the hearing.

6/25/04 TRANSCRIBER: Debbie Barnard
R & S Typing Service

Signature

6/25/04 PROOFREADER: Sheila Orms
R & S Typing Service

Signature

6/25/04 REPORTER: Bob Addington

Signature