

UNITED STATES DEPARTMENT OF AGRICULTURE

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GRAIN INSPECTION ADVISORY COMMITTEE

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THURSDAY,
DECEMBER 16, 2021

The meeting came to order at 11:00 a.m. EST
via Videoconference, Matthew Kerrigan, Chair,
Presiding.

COMMITTEE ATTENDEES:

DAVID AYERS, Champaign Danville Grain Inspection,
Inc.

CHAD CHAMBERS, Caledonia Farmers Elevator

JANICE COOPER, Wheat Marketing Center

CURTIS ENGEL, The Scoular Company

NICHOLAS FRIANT, Cargill, Inc.

MATTHEW KERRIGAN, EGT, LLC

RYAN KUHL, Northern Plains Grain Inspection
Service

ROBERT SINNER, SB&B Foods, Inc.

JIMMY WILLIAMS, Missouri Department of
Agriculture

USDA STAFF:

LEE CAPPER, Chief Innovation Officer

ANTHONY GOODEMAN, Field Management Division

ED JHEE, Technology and Science Division

KENDRA KLINE, Agricultural Marketing

ARTHUR NEAL, FGIS Deputy Administrator

TIMOTHY NORDEN, Scientific Integrity Officer

DENISE RUGGLES, Executive Program Analyst

C-O-N-T-E-N-T-S

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Call to Order

Matthew Kerrigan, GIAC Chair Person. 4

FGIS-FDA MOU Discussion

Nick Friant, Subcommittee Chair. 6

Public Comments.41

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

2 11:00 a.m.

3 MR. KERRIGAN: Good morning,
4 everybody. I just was going through to see who
5 was on currently because our speaker here in a
6 couple minutes, I don't see Nick on just yet.
7 While I am search for Nick and we're waiting for
8 Nick, we'll go ahead and take a roll call. I
9 think we have a pretty good list here. It looks
10 like David Ayers, it looks like you're on.

11 MR. AYERS: Yes, sir.

12 MR. KERRIGAN: So we've got Janice.

13 MS. COOPER: Yep.

14 MR. KERRIGAN: Jimmy?

15 (No audible response.)

16 MR. KERRIGAN: Mr. Sinner?

17 (No audible response.)

18 MR. KERRIGAN: We've got Chad.

19 MR. CHAMBERS: I'm here.

20 MR. KERRIGAN: Curt Engel?

21 MR. ENGEL: Here.

22 MR. KERRIGAN: Ryan Kuhl?

1 (No audible response.)

2 MR. KERRIGAN: And we are waiting on,
3 it looks like, Nick and -- oh, I just saw him
4 join.

5 MR. FRIANT: I'm here. Sorry about
6 that.

7 MR. KERRIGAN: And how about Tom
8 Tunnell?

9 (No audible response.)

10 MR. KERRIGAN: Tom had some conflicts
11 yesterday, and I did not hear back from him about
12 today. So okay. Well, we will keep an eye out
13 on that. Going off the agenda, we do have one
14 discussion to update the group on regarding some
15 subcommittee work regarding the FGIS FDA MOU
16 which I'm going to ask if Nick would walk us
17 through where that subcommittee work is at.

18 Once we're through that, we will take
19 roll call one more time to see where we are at.
20 If we have a quorum, we can discuss the
21 recommendations. If we don't, we'll open it to
22 public comments. And that may be the wrap.

1 Nick, do you want to go ahead and take it over as
2 the Chair of the FGIS FDA MOU Subcommittee?

3 MR. FRIANT: Indeed I will. Thanks,
4 Matt. And thanks everybody for the time today to
5 hear what the subcommittee worked on. And we'll
6 be able to show -- we'll actually be able to show
7 you that.

8 So what I wasn't able to do before
9 today's meeting -- sorry, I have too many screens
10 to look at here. What I wasn't able to do before
11 this morning's meeting was pull up the actual
12 recommendation that was made by the committee
13 during the last advisory committee meeting. But
14 in essence, it said let's move the former
15 subcommittee to look at -- to develop some pre-
16 approved reconditioning plans when a facility has
17 had an FDA actionable lot of grain.

18 So that was the basis for the
19 recommendation. We formed the subcommittee.
20 That subcommittee consisted of myself as the
21 Chair as Matt mentioned. We also had Dave Ayers,
22 Ryan Kuhl, Curt Engel. And I think that was it,

1 wasn't it? I don't even have those -- sorry, I
2 got caught in another call before this one.

3 I think that was all of the
4 subcommittee. And the intention of the
5 subcommittee was to take a look at the current
6 FGIS FDA MOU, what items were considered
7 actionable under that MOU, and then determine
8 what types of pre-approved reconditioning plans
9 we could have for that. Real quick and I didn't
10 see, is Barry from FGIS on this morning?

11 MR. GOMOLL: Yes, I am, Nick.

12 MR. FRIANT: Barry, sorry to put you
13 on the spot. Did you want to maybe just given a
14 quick update on the overall work that you've been
15 doing with FDA on the MOU? Because I think that
16 is pertinent to our discussion.

17 MR. GOMOLL: Yeah, I haven't had any
18 discussions recently, not since I think our last
19 meeting with the subcommittee. But I've been in
20 continuing talks with several members of FDA
21 CFSAN and others in their policy about
22 possibility of working with sort of pre-approved

1 plans. They seem to be at times more or less
2 receptive depending on how they're receiving the
3 messages, I guess.

4 Sorry. I just hit the space key. The
5 mute was on. They see to be more or less
6 receptive. And we'll have to -- once we get some
7 more concrete things, we'll have to figure out
8 which channels to go. I know they had said in
9 the past that with some other agencies, I think
10 talking about with maybe peanuts or some other
11 industry that a lot of the changes were pushed
12 from the industry and not from the U.S. -- hold
13 on one second.

14 My wife left the dogs behind me. So
15 now they're acting up. Can you not? Sorry. So
16 we've been having discussions. And I think I'm
17 definitely try to have a meeting with them
18 sometime in the early part of the year just to
19 touch base to see where they're at, especially
20 after we hear some more, what comes out of this
21 meeting.

22 MR. FRIANT: Excellent. Thanks,

1 Barry. And appreciate -- for sure from my seat,
2 appreciate your continued work with FDA on that
3 front. And I think it could have some good
4 discussions with them on how we can get these
5 pre-approved reconditioning plans in place.

6 So with that, the process that we took
7 as a subcommittee like I kind of alluded to was
8 we looked at the MOU, looked at the actionable
9 items that were in there and went through it and
10 said, okay, which of these actionable items do we
11 think are ones that we could reasonably have a
12 reconditioning place for that again could be pre-
13 approved? And I think hopefully this will work.
14 I'm going to try and share this. If not, Kendra,
15 I might need you to share it. But I'm going to
16 try and see.

17 MS. KLINE: Okay.

18 MR. FRIANT: Okay. Hopefully folks
19 are seeing the draft version. And I believe,
20 Kendra, this was sent out also as part of the
21 meeting announcement too, correct?

22 MS. KLINE: It was posted to the

1 public website a couple weeks ago.

2 MR. FRIANT: A couple weeks ago, yeah.
3 So what you can see here at the top is the types
4 of items, for lack of a better term, that are
5 actionable for which the subcommittee thought we
6 could have some sort of pre-approved
7 reconditioning plan for. And it was things like
8 the animal filth which we know has been a big
9 discussion topic, particularly deer droppings,
10 insect damage grain, aflatoxin which already has
11 a pre-approved condition plan, deleterious
12 foreign matter in grain, and then DLQ I have here
13 on account of large animal excreta.

14 And the next part of our process was
15 to essentially take the current pre-approved plan
16 for aflatoxin and modify that to fit all of these
17 actionable items. So what you'll see here or
18 what you may have seen if you went through the
19 draft that was posted on the public website
20 basically is following that, the reconditioning
21 plan that is in the mycotoxin handbook, the
22 Section 6 or 6.4 more specifically. And we

1 basically took that verbiage that was in that
2 reconditioning section and modified it to fit
3 additional types of actionable items that we
4 could see in grain elevators.

5 So I don't know that we need to read
6 through the whole thing with this group. But
7 maybe what I would call out is a couple points
8 that the subcommittee talked about that we found
9 were important. And I'll start with kind of
10 right here on the middle of my screen.

11 If the subplot or lot is found to be
12 actionable due to IDK, the affected grain company
13 could elect to divert that lot directly into
14 animal feed without reconditioning. And this is
15 something that we talked about and said, well,
16 maybe the facility doesn't want to deal with
17 reconditioning, try to remove that IDK. And so
18 could go directly into animal feed and more
19 importantly have a little bit more flexibility to
20 go directly into animal feed without necessarily
21 having to go through the full -- if folks aren't
22 familiar with it, the very prescriptive process

1 of diversion to animal feed.

2 So that was something I would consider
3 new to kind of the overall reconditioning
4 procedures is the ability to direct the
5 actionable lot directly into animal feed. After
6 that, we did spend some time talking about the
7 concept around, well, how many times can you run
8 the grain? So in most conditions, what we're
9 saying is you can run the grain over a cleaner
10 screener separator, some sort of process to
11 remove that actionable item.

12 And so we had some discussion around
13 the ability to make multiple passes across the
14 mechanical cleaners. Folks that are familiar
15 with the aflatoxin reconditioning procedure will
16 likely remember that the facility can run the
17 corn, for example, over the cleaners as many
18 times as they want but only have one chance to
19 get that officially regraded and retested for
20 aflatoxin. And so we talked about that piece as
21 well which is number 2 here on the screen of --
22 the first part is the applicant can pass the

1 actionable lot over a cleaner -- some sort of
2 mechanical cleaner multiple times.

3 And a change that we're proposing is
4 not only multiple passes which is consistent with
5 previous procedure. But that grain can also be
6 eligible for the original inspection and a full
7 set of review inspections and follows the FGIS
8 policy around review inspections. So we
9 recognize that this was a potential -- not
10 potential, it is a change from previous policy
11 position and something that likely will be open
12 for discussion with the agency FGIS and
13 potentially FDA as well.

14 I think that's probably the most
15 substantive change I want to bring to the group.
16 Otherwise, the FGIS procedures, FGIS
17 responsibilities essentially stay the same to
18 what is currently in the aflatoxin section except
19 obviously expanded to cover multiple actionable
20 items, domestic locations, essentially, the same
21 procedure with the official agencies, sample size
22 and preparation, again, essentially the same as

1 what's currently listed, basically, a cut and
2 paste right out of the current reconditioning
3 requirements in the mycotoxin handbook. And the
4 disposition piece again is essentially the same,
5 just expanding it to not only cover aflatoxin.

6 It would be any of those actionable
7 items. And so that's what the subcommittee has
8 developed, what we are, I guess in this case, now
9 reporting back to the broader committee. I think
10 if folks had time to review it prior to today's
11 meeting, I think we are certainly open to
12 questions, comments. And then I guess we could
13 probably have some discussion around next steps.
14 But we -- I don't think we can take any official
15 action necessarily on next steps.

16 MR. KERRIGAN: Thanks, Nick.

17 Regarding next action, obviously the subcommittee
18 put this out there. I'm assuming that our entire
19 group would be to recommend it. Or is this
20 something that FGIS on their own would then be
21 discussing with FDA without a recommendation just
22 from a procedural question?

1 MR. NEAL: So in light that you all
2 have been working with Barry on this, we can --
3 and with us and considering we do not have a
4 quorum, I think -- and it's tough right now.
5 It's tough because we've taken this work up as
6 part of the committee. You can't make a formal
7 recommendation on it.

8 I think what we can do is still have
9 conversations with FDA about the discussions and
10 share industry thoughts. I think from a formal
11 standpoint once we do get quorum, it will be
12 great to have this officially come from industry
13 to FDA because their feedback to us is that they
14 need to hear from industry, not USDA. And so the
15 whole purpose of bringing this issue to the Grain
16 Inspection Advisory Committee is so we can have
17 feedback directly from industry to FDA so that
18 they do know that this is not just us carrying
19 the war.

20 (Simultaneous speaking.)

21 MR. FRIANT: I'll just come to that
22 does not prevent us from still engaging and

1 facilitating conversations about the concepts
2 discussed so that we can still make progress.

3 MR. GOODEMAN: May I add something
4 real quick, Nick?

5 MR. FRIANT: Yeah, please, Tony.

6 MR. GOODEMAN: I think it would
7 definitely help like Arthur was saying. Like,
8 FDA was pretty -- they're big advocates for
9 hearing from the industry. And so it'd be
10 helpful for us knowing this was a really good
11 unified position from the committee.

12 And if there's not a whole lot of
13 dissension here which I don't think there is.
14 But I think it'd be helpful to have committee's
15 support. I'm also curious if NEAGA would pick up
16 any subcommittee's work and endorse it through
17 their own organizations. I'm not sure if this is
18 the right forum to ask that question. But that
19 is something that might be another means to help
20 push it with FDA.

21 (Simultaneous speaking.)

22 MR. FRIANT: I mean, on that front, I

1 would -- I mean, I'm not sure that many people
2 know this. I chair the NGFA Grades and Weights,
3 and the NEAGA Grades and Inspections Committee.
4 So my intention would be to take this to those
5 committees for review and input.

6 And then the committees and respective
7 staff would make some decisions on if and how to
8 pursue this with FDA. I think we had talked
9 about it as the committee, right, FDA wants to
10 hear from industry. But I'm not sure that I
11 shared that well or clearly with NGFA and NEAGA.

12 So that's a key point that FDA would
13 want to hear directly from industry. So I think
14 the short answer to that, Tony, is yes, I think
15 it would be something that NGFA and NEAGA would
16 be interested in for sure, providing input and
17 feedback and then some further discussion on how
18 to approach it potentially with FDA. I think the
19 only thing I wanted to raise, Arthur, before I --

20 (Simultaneous speaking.)

21 MR. McCLUER: Nick, I was just going
22 to say totally support what you're saying. As

1 chairman of the Grain Grades and Weights
2 Committee, I think this is definitely -- this is
3 the initial draft and this would be definitely at
4 our next meeting. We would definitely put this
5 on the agenda for review and kind of go through
6 it. Matt -- Chairman Kerrigan is also a member
7 of the Grain Grades and Weights Committee too.
8 So I think that'd be a good opportunity for
9 feedback from the members and something to take
10 back to the full advisory committee as well
11 because there may be some additional input for
12 the advisory committee to consider too.

13 MR. FRIANT: Thanks, Jess. So Matt
14 and/or Arthur, I guess, from a procedural
15 perspective, is it fair to say we would
16 essentially -- as a subcommittee, we would still
17 be operating under the current recommendation of
18 forming the subcommittee, developing the draft.
19 And so as a subcommittee, we could still work on
20 it, whether that be subcommittee working with
21 Barry and FDA or subcommittee working with trade
22 associations, right? I see you shaking your

1 head, Arthur. So we can still operate under that
2 current recommendation and we'll still be okay
3 from a procedural perspective.

4 MR. NEAL: Yeah, nothing is preventing
5 us as a subcommittee from having a dialogue,
6 sharing a perspective that's been developed to
7 date. What we cannot do is take action on the
8 document as a committee. That's the main thing
9 we can't conduct business on.

10 MR. FRIANT: Sure. Continuing to
11 accept feedback from the committee is not
12 considered business, though, right?

13 MR. NEAL: Right. The subcommittee is
14 still working.

15 MR. FRIANT: Sure.

16 MR. NEAL: That's no problem. And so
17 what you're doing as a subcommittee, if you're
18 complete -- if you've completed your work, you
19 would then hand that work over to the full
20 committee. And the full committee would take
21 action to either endorse or modify or reject the
22 body of work that the subcommittee has done.

1 You've not turned the body's work
2 fully over to the committee is what I'm hearing.
3 The subcommittee is going to continue generate
4 input from the industry as well as facilitate
5 dialogue to kind of gauge how open FDA is to
6 entertaining some of these concepts. You're also
7 going to work with other trade groups to garner
8 more input and assess how people feel about those
9 things. So the subcommittee is still working
10 under a previous action that was taken at the
11 last meeting. So we're good.

12 MR. FRIANT: Thank you for that
13 clarification, Arthur. I appreciate that.

14 MR. NEAL: Yes, sir.

15 MR. FRIANT: So with that, I mean, I
16 would ask for the committee members that are on
17 the phone this morning any questions that I or
18 anyone else on the subcommittee could answer
19 about what we've identified, the proposals that
20 we're working on. Any questions or comments from
21 the broader committee?

22 (Simultaneous speaking.)

1 MR. KERRIGAN: I would just add for
2 everybody listening here just backing up to the
3 concept of why the subcommittee was formed and
4 why these reconditioning procedures are, I guess,
5 wanted or needed. Is it because of the sheer
6 time that the FDA can take and the, I would say,
7 inconsistent application of reconditioning plans
8 from their own office to office across the
9 country? Like I said, there was a successful
10 model with aflatoxin already out there that had
11 been approved.

12 With that as far as what procedures
13 could take, that could be under observation by
14 FGIS to complete. And the idea was to replicate
15 that across additional actual items from FGIS to
16 FDA. Sorry, Bob, I think I spoke over you there.

17 MR. SINNER: No, that's fine. And
18 this may be pretty straightforward, Nick. On
19 that third paragraph there under 6.4 under the
20 wheat, does anything need to be qualified in that
21 statement in regards to mycotoxins?

22 A lot of times, IDK leads to molds and

1 mycotoxins. Does that -- because really it's
2 stating that that grain can be moved directly
3 into animal feed without reconditioning and not
4 even needing to notify FDA. Is there anything
5 there that needs to be qualified regarding
6 mycotoxins?

7 MR. FRIANT: You know what, Bob?
8 That's a really good question. We did not talk
9 about the mycotoxin piece. We were purely
10 focused on just the insect damage kernels. So I
11 think that's -- my answer would be that's
12 something the subcommittee should maybe discuss a
13 little bit further because we did not consider
14 the mycotoxin piece.

15 MR. SINNER: Okay.

16 MR. FRIANT: But I appreciate that
17 feedback for sure.

18 MR. SINNER: Well, I mean, a lot of
19 times, insect damage grain leads to molds and we
20 all know that. And so I just wondered if that
21 should be qualified with this in that statement.

22 MR. FRIANT: If I could spell. Go it.

1 Yeah, we'll make sure we consider that. I
2 appreciate that. Thanks, Bob.

3 MR. SINNER: Good.

4 MR. NEAL: Nick, I've got a question
5 and this may be just because of my unfamiliarity.
6 That particular highlighted paragraph, would FDA
7 know why we are suggesting that in the case of
8 wheat that we are suggesting that it can be
9 elected that the wheat be diverted into animal
10 feed without reconditioning? Would they
11 understand why we would be recommending that?

12 MR. FRIANT: That's a good question.
13 Knowing FDA, it's probably not safe to assume
14 that they would understand that which I think is
15 probably where you're getting to a little bit
16 with your question, right? Like, so what I think
17 I hear you saying is maybe we need a little bit
18 more why apply to this section.

19 MR. NEAL: Yeah, let me -- so my
20 perspective would be don't assume they know
21 anything. And I'm not saying that they don't.
22 But we know that there's turnover happening all

1 across the lane. And it will be best that if
2 there's something that could appear to be
3 digested and potentially be passed on and
4 consumed by humans or animals. They need to
5 understand why it --

6 MR. FRIANT: Sorry, I think you froze
7 up on my end, Arthur.

8 MR. NEAL: Was I frozen?

9 MR. FRIANT: Yes, you froze up on us.

10 MR. NEAL: Oh, man. Kendra said, I
11 may be frozen. All right. I don't know. But I
12 was just saying because we're diverting an
13 actionable lot potentially to animals, we need to
14 make sure we address the reason why it would not
15 be an impact on human --

16 MR. FRIANT: Yeah.

17 MR. NEAL: -- or animal health and
18 safety. And FDA is going to be looking at things
19 for that type of impact. When people get sick
20 from it, when animals get sick from it, will it
21 be passed on to somebody else?

22 MR. FRIANT: Yeah, yeah, good call,

1 Arthur. I appreciate that for sure. Perhaps
2 that's something that's actually needed more
3 broadly. We might need to think about overall
4 for all of these items why. We might need to
5 defend why cleaning is an appropriate -- cleaning
6 and screening is an appropriate reconditioning.

7 So I appreciate it. I think that's
8 good feedback, and I think you're right. We --
9 even just from my own seat it was probably making
10 that assumption that FDA understood the grain
11 business in general.

12 MR. GOODEMAN: Nick, is the assumption
13 that when things are reconditioned that the
14 cleanings or screenings -- and I'm sorry if it's
15 in here -- are they disposed or are they diverted
16 to animal feed?

17 MR. FRIANT: Yep, so we basically took
18 it right from the aflatoxin document to say that
19 they're not going to reenter the human food
20 channels screenings. Maybe this needs to be
21 expanded further to say any type could be
22 diverted into animal feed. Doesn't necessarily

1 say that they have to go to just landfill or
2 disposal.

3 MR. GOODEMAN: Right, right.

4 MR. FRIANT: And we also say contact
5 the FDA office on other --

6 MR. GOODEMAN: Right.

7 MR. FRIANT: -- specific disposition
8 actions for the screenings.

9 MR. GOODEMAN: If my understanding is
10 accurate, the industry before was concerned if
11 they were able to clean something, screen
12 something, and then only have to worry about
13 dealing with FDA on the clean portion, whatever
14 it is, the ten percent of the -- or five percent,
15 whatever it turns out to be versus and then being
16 free to handle the clean cargo. That would
17 address a big part of the issue, right?

18 MR. FRIANT: Yeah, yeah.

19 (Simultaneous speaking.)

20 MR. GOODEMAN: -- follow up directly
21 with FDA and what to do with the screenings. We
22 were free to move the clean grain, the

1 reconditioned grain. And that would alleviate a
2 lot of the problem, right?

3 MR. FRIANT: Yeah, yeah. For sure
4 being able to move the clean grain is the focus.
5 But you're right. And frankly, we focus so much
6 on what I would call the top portion of the
7 document, the procedures --

8 MR. GOODEMAN: Yeah.

9 MR. FRIANT: -- and some of the
10 disposition, certainly open for suggestions,
11 comments from anyone on that. And I think that's
12 a good call out, Tony.

13 MR. NEAL: Nick, would you mind
14 sliding up to the previous page?

15 MR. FRIANT: Without having both
16 documents side by side, I can't say for sure.
17 But most of this section was cut and paste right
18 from the current aflatoxin reconditioning
19 procedures.

20 MR. NEAL: I think Tony -- go back up
21 a little bit, Nick. Yeah.

22 MR. FRIANT: This would've been an

1 addition or clarification here, right, for
2 example.

3 MR. NEAL: Yeah, yeah. And that's
4 what I was about to say is that we have to really
5 reiterate what it is we're trying to do to help
6 them carry out their responsibilities. And we're
7 looking at this as an SOP which is fine. I think
8 for us when we sit down to talk with them, we'll
9 need to present it as such that we're not trying
10 to necessarily get you out of the way.

11 We're really trying to help facilitate
12 your work as well as streamline the food supply
13 chain yet maintain a keen eye and concern for
14 human and animal -- we're not in safety. So we
15 can't necessarily be deputized by them. But
16 we're trying to honor their work considering
17 loose constraints and things of that nature and
18 see whether or not this can fit into their plan
19 for carrying out oversight in this space.

20 And so I see this more of an SOP.
21 We'll probably have to have another kind of cover
22 that really explains what it is we're trying to

1 do. But we have already conveyed to them our
2 desire to work with them, the reason why we need
3 to work with them. But when we do finalize this,
4 we want to make sure it's packaged so that they
5 can digest it the way we intend them to.

6 MR. FRIANT: I think that's a good
7 comment, Arthur. So I've captured that here,
8 right, clear responsibilities. I'll have FGIS
9 help me facilitate FDA's work. Streamline
10 grains, I think those are all good, good
11 language.

12 And then also what I heard you say is
13 whether it's a cover letter or preamble or
14 something along those lines that gives more that
15 clarification guidance because you're right. The
16 discussions that we as a subcommittee either with
17 Barry or through Barry or directly might have
18 with FDA, those people might change three, six,
19 nine months, years, whatever down the road. So
20 yeah, I'm definitely following what you're saying
21 on that.

22 MR. NEAL: Yeah, and another thing I

1 see that's really critical and important and
2 beneficial with this is that it can also be used
3 as a way of facilitating a consistency in the
4 midst of change, changing staff. It helps to
5 reduce that learning curve because we'll be
6 taking some of that responsibility on for them
7 but communicating with them. I think -- and I
8 don't if it is in here. I think that whatever we
9 do on their behalf, there needs to be a
10 responsibility that we document it and convey
11 that to them so that they are aware of the
12 decisions that have been made.

13 MR. FRIANT: Yep, so I think to your
14 point, Arthur, I think that is covered here.

15 MR. NEAL: Yeah, you got it. You got
16 it.

17 MR. FRIANT: Now there might be some
18 question and debate on which that be clear enough
19 for FDA going forward, right? Is there something
20 more that they would want. But yea, you're
21 absolutely right in terms of we don't want
22 anybody from FDA coming back to FGIS or the

1 industry saying, well, we didn't know you did
2 that.

3 MR. NEAL: You got it. Thanks.

4 (Simultaneous speaking.)

5 MS. COOPER: I just had a question.
6 So you mentioned a lot of the language came from
7 the existing policy. For discussion purposes, I
8 think it would be helpful to do a document where
9 it's clear what the additions or changes are.

10 MR. FRIANT: Yes.

11 MS. COOPER: Either attract changes --

12 MR. FRIANT: I'm not going to try and
13 do that.

14 MS. COOPER: No, not right now.

15 MR. FRIANT: Not in this venue. But
16 I think I can do that with the work that we did,
17 Janice, where you can see the tracked changes.
18 If not, we can probably work with someone to get
19 that to you so you can see it more clearly.

20 MS. COOPER: And then I think it would
21 just present that maybe you're not proposing that
22 may differences, that there's a lot of the policy

1 already there. You're just tweaking it. And I
2 think that that might be an easier sell with FDA.
3 I don't know. Just from an editorial standpoint,
4 I didn't know what was existing versus what was
5 being changed, so --

6 MR. KERRIGAN: Was this as much of a
7 change as it is a new document? I realize that
8 we've copied and pasted the aflatoxin with it.
9 So I guess that would be my question knowing that
10 we've added so much. We've based it off the
11 aflatoxin, but do we want to show it as a change?
12 Or do we want to show it as a new document
13 because of everything else that's been added to
14 it?

15 MS. COOPER: And I'm just unfamiliar
16 with the procedure. So I didn't know.

17 MR. FRIANT: Yeah, great -- I think
18 great point, Janice, from you and I think great
19 question, Matt, from you. Maybe that's some
20 additional discussion that the subcommittee could
21 have on the best way. Because I think your
22 intention, Janice, is spot on, right?

1 Demonstrate to FDA what we're
2 proposing for other actionable items is
3 consistent with what's already been in place for
4 aflatoxin which we clearly know is a food and
5 feed safety issue, right? So I think your mind
6 is in the right place. How we do that, yeah,
7 Matt. It might be a good question.

8 Is it good enough to do like track
9 changes? Or do we need some sort of additional
10 comparison document? That's a valid question.
11 So I think as a subcommittee, maybe we need to
12 regroup on that piece. What I'm hearing, I've
13 heard it from Arthur now and I hear it too now
14 from you, Janice, is the story that we need to
15 tell FDA, right?

16 We can't just go in front of FDA and
17 say, here it is. This what we want to do. But
18 why, how, the importance, like, there's as much
19 to that story and that preamble or cover letter
20 or introduction, whatever we want to call it,
21 that's going to matter down the road when the
22 next person at FGIS or the next person at FDA

1 sees this that wasn't part of this subcommittee
2 or committee work.

3 MS. COOPER: And maybe what I'm
4 suggesting is already going to be covered in what
5 Arthur suggested in the preamble and the
6 explanation. And maybe that will be sufficient.
7 So it was out of -- really out of ignorance that
8 I kind of asked the question about how the
9 document -- how much of the document is current
10 language and what is being proposed. So you can
11 handle that in lots of different ways per Matt's
12 comment. So just I think clarification is the
13 goal of all this discussion.

14 MR. FRIANT: A hundred percent agree
15 with you. Like I say, I'm not going to embarrass
16 myself in front of everybody with my IT skills to
17 pull up the track changes. But I think we can
18 start from there. I think that's a good point.

19 MR. KERRIGAN: A question in talking
20 about kind of the preamble and discussing or
21 trying to lay out the basis for animal and human
22 food safety was, are we aware of a document that

1 covers that currently for when the aflatoxin
2 procedures were put in to kind of see how that
3 was laid out. Or was that kind of pre- and
4 basically all done, I guess, verbally or through
5 staff?

6 MR. FRIANT: And that'd be a question,
7 I think, for Tony maybe. As long as I've been in
8 my role, I think that's what's been in place.

9 MR. GOODEMAN: What was it again,
10 please, Nick?

11 MR. FRIANT: So do we know any of the
12 basis for how the aflatoxin reconditioning
13 procedure was established and agreed to?

14 MR. GOODEMAN: I think much like this.
15 I think it was an issue and didn't want to have
16 to wait probably -- I'm guessing here, probably
17 during some high aflatoxin years and not having
18 to wait for a bunch of bins to be tied up when
19 the reconditioning procedure was going to be
20 likely the same. I think there's also some
21 research about the broken corn -- the broken
22 kernels containing a higher concentration of

1 aflatoxin and prompting the cleaning to be
2 allowed, then the retesting. It's --

3 MR. KERRIGAN: That --

4 (Simultaneous speaking.)

5 MR. GOODEMAN: -- for a long time,
6 though.

7 MR. KERRIGAN: That research is just
8 kind of maybe the question that kind of proves
9 that. As we think about the preamble or trying
10 to explain why the cleaning is available, and I
11 understand it's a little bit different with
12 aflatoxin and mycotoxins and then the whole
13 grain, the broken pieces versus taking out the
14 physical pieces in the case of, like, animal
15 filth, right? It's a very obvious one-to-one.

16 We were just kind of curious. Either
17 it's something to go off of or if we are going to
18 include aflatoxin with this as a rewrite versus
19 two separate documents, we don't want to lose
20 where we are with aflatoxin by combining them
21 which may be a strategy with the subcommittee.
22 Maybe they do need to be two separate documents

1 so that way we don't muddy the waters of
2 aflatoxin of somebody new reviewing it and
3 thinking that that's a new procedure as well.

4 MR. GOMOLL: Let me chime in for a
5 second. That has been one of my challenges.
6 I've been trying for the last probably at least
7 two years now to track down information about
8 when the aflatoxin procedure came into practice.

9 And I can't find any documentation
10 from talks when it happened. I've been looking.
11 I've been chatting with people that have been
12 around. I just know it's been in place since at
13 least the '90s.

14 MR. FRIANT: So you got to track down,
15 like, Dave or --

16 MR. GOMOLL: Right. And I know there
17 was some information from Bob Lijewski's archives
18 about some changes that were made where I know
19 there was a recent -- well, at least in terms of
20 history, a more semi-recent change to allow
21 multiple passes over the cleaner where I think
22 originally I think it was one pass. And then the

1 changes made to say, okay, as many passes as you
2 want, but we're still only going to test it once.

3 MR. GOODEMAN: Yeah. And I think it's
4 very fair to say it's over 20 years, right,
5 Barry, that this has been in place, the aflatoxin
6 recondition?

7 MR. GOMOLL: Yeah, in some of the
8 research, I did find some writing from Dr.
9 Charlie Hurburgh from, like, 1993 it was dated
10 where he referenced this aflatoxin reconditioning
11 procedure, so at least since then.

12 MR. FRIANT: I know Charlie actually
13 mentioned to me he was going to try and be on
14 today. I don't know if he's here. But I think
15 it's fair we could open it to his comments if he
16 is here. And I don't see him.

17 No, and so I appreciate this. I think
18 this is all great feedback and great questions.
19 And what I am hearing is we get into the first of
20 the new calendar year. We've got some continuing
21 work for the subcommittee to address on this one
22 which was the whole purpose for bringing it up

1 for discussion today. So I guess any other
2 comments, questions, feedback from folks on the
3 committee?

4 MR. CAPPER: Nick, this is Lee Capper
5 with FGIS. Just a comment for clarity. Up above
6 where we're talking about responsibility, Bob
7 called out the FOM and then later also called out
8 the delegated state as applicable. As you're
9 preparing this, just make sure that where the
10 delegate states are appropriate, that's also
11 included.

12 MR. FRIANT: Okay. So in the --
13 definitely in the responsibility section, right?

14 MR. CAPPER: Yeah, right there. The
15 first part of that highlight says FOMs. But I
16 think perhaps it's meaning to say both, field
17 office managers and delegate state officials, at
18 the top of the second page. Or if it's not, it's
19 not.

20 MR. FRIANT: I agree, and I think
21 that's a good call out because in delegated
22 states, it would be their officials more likely

1 correctly. Okay. Yeah, I think we can address
2 that too as a subcommittee. Okay, Mr. Chair. I
3 think unless there's any other questions or
4 comments, the subcommittee has direction on
5 continuing forward with this. And we'll keep
6 working under our current program.

7 MR. KERRIGAN: Okay. Well, appreciate
8 everybody's comments and time on this for the
9 members of the subcommittee, members of the
10 overall GIAC as well as the staff in assisting
11 with this. It's been a big help and, like I say,
12 a lot of work. And we'll see where we get to
13 with it.

14 MR. FRIANT: I'll echo those comments
15 real quick. A big thanks to the subcommittee
16 members for taking extra time. I really do
17 appreciate that and a special call out for Barry
18 and his work and communications with FDA. Also
19 really appreciate that.

20 MR. KERRIGAN: Absolutely. Okay. As
21 we've discussed, we do not have a quorum. We
22 will not have a quorum today. But we do have

1 another opening here for potential for public
2 comments before we move in towards the final
3 section of our meeting, if there are any. There
4 weren't any yesterday. We'll kind of give a few
5 brief moments here to see if anybody has anything
6 that they'd like to discuss.

7 MR. McCLUER: Hey, Matt. I do have
8 one follow-up questions from yesterday for Arthur
9 regarding the fee reviews that I guess I just
10 want to make sure for clarification I was on the
11 same page. I always think of the national and
12 local tonnage fees, right? The five-year roll in
13 average.

14 And you're talking reviews. I'm
15 assuming it's some of the other fees, the
16 Schedule B fees. I mean, some of the things such
17 as the -- just like we're talking, the testing,
18 aflatoxin testing, and some of those other
19 services. Is that correct?

20 MR. NEAL: I'm not quite sure I fully
21 understand the question.

22 MR. McCLUER: The question I'm just --

1 I'm following up on a statement that you made and
2 I'll go back here. It was you said that -- where
3 did I write this down? You said that we're going
4 to be reviewing the fees. So you made a
5 statement saying reviewing the fees. And so --

6 MR. NEAL: Yeah, so --

7 MR. McCLUER: -- I just want to make
8 sure when you're saying reviewing the fees I'm
9 understanding what particular fees you're going
10 to be reviewing.

11 MR. NEAL: Yeah, so we'll need to do
12 a periodic review of the fees that we have set
13 for the services that we provide. The national
14 tonnage fee, that formula is set.

15 MR. McCLUER: Yeah.

16 MR. NEAL: The reality is that we are
17 -- we've been operating at a discount for about
18 six years now. And so we will not be able to
19 continue to provide service at the current fees
20 that we have set. I'm not saying anything is
21 going to happen.

22 Something may not happen. But for the

1 last six years, we've been spending more than
2 we're generating in revenue. And so at some
3 point, we have to review the fees that we have
4 set to do an overall look at what fees we're
5 charging for services.

6 MR. McCLUER: Correct. So we're not
7 talking those fees that are part of the five-year
8 rolling average. We're talking the other service
9 fees that are -- correct. I mean, is there --
10 can you give me an example just to make sure what
11 we're talking of? What would be an example of
12 another fee?

13 MS. RUGGLES: Hourly fees, mycotoxin
14 fees, appeal fees.

15 MR. GOODEMAN: Any kind of unit fees,
16 right?

17 MR. McCLUER: Okay, okay.

18 MR. GOODEMAN: And hourly. And the
19 breakdown between non-contract and contract,
20 they've been both -- I don't want say the same
21 but proportionally the same to one another for
22 many years. And so we're due for a look to see

1 if the non-contract rate should be higher or
2 lower and if the contract rate should be higher
3 or lower respective to our costs for maintaining
4 those -- really for maintaining non-contract
5 availability.

6 MR. McCLUER: Okay. That's what I
7 thought and I just wanted to confirm, right, that
8 those are the specific type of fees that were
9 being referred to. And so reviewing that, will
10 that be something that'll be provided to the next
11 official advisory committee meeting as part of
12 the review, I mean, if there's going to be any --
13 if you decide to -- I guess if there's a decision
14 to be made, whether they're going to increase and
15 when will that be announced when we have January
16 rulemaking?

17 MR. NEAL: Yeah, that's a totally
18 different process. There's a lot of education
19 and review that has to happen internally inside
20 of USDA. And we'll be engaging with industry as
21 we embark upon that process.

22 So this is not something that's going

1 to happen swiftly. It's not something that's
2 going to happen secretly. So just stay tuned.
3 We're just sharing with you all kind of where we
4 are. That was really the whole point of stating
5 it is that we're at a point where we really have
6 to review the fees that we have set so we don't
7 continue operating at a loss like we are.

8 MR. McCLUER: Okay.

9 (Simultaneous speaking.)

10 MR. GOODEMAN: And Arthur, if we do
11 make any changes, that'd be done through
12 rulemaking, right?

13 MR. NEAL: It'd be done through the
14 Federal Register.

15 MR. McCLUER: Beforehand, were you
16 doing the research and getting feedback from
17 stakeholders, correct, before you --

18 MR. NEAL: Say that again, Jess.

19 MR. McCLUER: I said before you go
20 into the formal rulemaking process, you'd be
21 soliciting feedback from stakeholders to as
22 you're going through this review, correct?

1 MR. NEAL: So the process we will be
2 working out internally and we'll be communicating
3 how we'll proceed because this is the first time
4 we'll be doing this, I think, in a very long
5 time. It's kind of overall periodically. So how
6 we solicit the comments, when we solicit the
7 feedback, that piece, we don't have worked out
8 just yet. But when we do, we'll engage in a
9 dialogue so that folks can have a clear
10 expectation of how the process will flow. But it
11 will not be done in the dark.

12 MR. McCLUER: Okay. No, that's
13 helpful. I appreciate that clarification.

14 MR. KERRIGAN: I think we have a
15 question from Mr. Mark Tess.

16 MR. TESS: Yeah, this is Mark Tess
17 from Charm Sciences. And I apologize for not
18 being on the call yesterday. But I had a comment
19 about a procedure and submission guidelines for
20 evaluation of technology for the official grain
21 inspection. And my question is, does the ITE
22 process going to apply to existing quality

1 factors such as mycotoxin testing where there's
2 already a procedure in place for validating test
3 kits?

4 MR. JHEE: No, no. You're already --

5 MR. TESS: Okay. And that -- sorry,
6 go ahead.

7 MR. JHEE: Since the mycotoxin test
8 kit program is already an established program, it
9 doesn't fall within the purview of it.

10 MR. TESS: Okay. And that won't
11 affect, like, future readers that companies,
12 manufacturers may submit. Or my other question
13 would be, is it going to affect, like, new
14 mycotoxins if FGIS determines that there's a need
15 to have a criterion specification for T-2/HT-2 or
16 the possibility of ergot alkaloids in the future?

17 MR. JHEE: I think we'll probably have
18 to address that latter question once that type of
19 technology is revealed in terms of being a
20 possible use in the industry.

21 MR. TESS: Okay.

22 MR. JHEE: Tim, any other thoughts

1 from your perspective, Tim Norden?

2 MR. NORDEN: Yes, I would say if it's
3 a new technology for detecting mycotoxins,
4 whether it'd be some kind of beam that you're
5 aiming through the grain stream or you're taking
6 some grain dust or some brand-new technology,
7 that would fall, I think, under the ITE directly.
8 But if it falls within our existing mycotoxin
9 test kit evaluation program where the -- that
10 technology, then we already have that in place.
11 So it wouldn't fall under the ITE.

12 MR. TESS: Okay. We have several
13 different people here reading the purpose and
14 scope. And some of us really thought the way
15 that you're commenting on this whereas others
16 kind of thought it may affect current procedures
17 as well. So I don't know if perhaps there needs
18 to be better clarification or more clarification.
19 Or Charm may just not have been privy to some of
20 this information prior to reading this document.

21 MR. NORDEN: Yes, Section 4 covers
22 that. But we'll read that statement and make

1 sure that -- we make sure that it's clear. It
2 says that approvals of rapid mycotoxin and
3 biotechnology testing methods are performed
4 through the FGIS rapid test kit evaluation
5 program.

6 And then it says, for more
7 information, there's a link there. But I
8 understand your point. We could clarify that and
9 make it even more transparent there, I think.

10 MR. TESS: That is how I interpret it.
11 And I appreciate your comment. But I know later
12 in the document there was a comment that unless
13 specifications already exist. So other people
14 read that as could still be implicated in terms
15 of following this procedure. So thank you for
16 your clarification, though.

17 MR. NEAL: And by reminded too that
18 this document, once it is released, will be open
19 for comment.

20 MR. TESS: Thank you.

21 MR. NORDEN: Great question.

22 Appreciate it.

1 MR. KERRIGAN: Any other comments or
2 questions from the field?

3 (No audible response.)

4 MR. KERRIGAN: I'm not hearing
5 anything. I would like to, Arthur, put you on
6 the spot a little bit to talk a little bit, to
7 explain to the group where we're at as far as the
8 committee selection members, just kind of advise
9 on timing. We're right in the process. We know
10 that it is a long -- can be a long process and
11 what that means for our quorum, if you could,
12 please.

13 MR. NEAL: Great question. We checked
14 again this morning. And the nominations are with
15 the Secretary. I can't put a definitive time
16 frame on the decision. But if I had to guess,
17 before our next meeting we should have our new
18 members appointed.

19 We're at the end of the appointment
20 process in terms of him making the selections.
21 And so I don't think we'll be faced with the
22 current challenge that we are. We're also going

1 to begin working on the new committee charter to
2 make sure we're ahead of that timeline.

3 And we'll start going out for an
4 announcement for new committee members next year
5 as well. So we'll have a full slate of work
6 ahead of us. But in terms of the five members
7 that we need, I believe that we will have them
8 appointed before we meet again. That's my
9 belief.

10 MR. FRIANT: Hey, Arthur, to that
11 point, will the -- the selection process, I
12 guess, would also include some alternates. I
13 know in the past, we would have alternates that
14 could fill in if folks were unavailable or
15 retired or left the committee or whatever. Will
16 we go back to trying to have alternates in the
17 future do you think?

18 MR. NEAL: Great question. Based on
19 legal review that we've received, the alternates
20 are not authorized by statute. And so we've been
21 informed that we can no longer do alternates.

22 MR. FRIANT: Okay. Thanks for sharing

1 that. I appreciate that.

2 MR. KERRIGAN: Thanks, Arthur. I just
3 got a question back. It is regarding the
4 discussion yesterday with AMS Transportation and
5 the -- how this group might be able or FGIS might
6 be able to assist with some of these shuttle
7 train rail transportation scheduling.

8 Obviously the STB is tackling a lot of
9 it. But comments are always welcome. And I
10 guess there's kind of an open question to this
11 group or to FGIS as far as what we can or can't
12 do or should or should not do maybe, whether it'd
13 be from FGIS, whether it'd be from the GIAC, if
14 that's something we take up, if that could be in
15 a recommendation or if there's any thoughts on
16 that, I guess.

17 MR. NEAL: I'll speak just from a
18 general perspective. National Grain and Feed
19 Association works very closely with
20 transportation and marketing on filing comments
21 on behalf of ag shifters as it pertains to these
22 type of ag transportation issues. However,

1 everybody here may not be a part of NGFA.

2 At the same time, as you saw
3 yesterday, the transportation and marketing team,
4 not familiar with everybody either that's
5 represented in this meeting. And the on the
6 ground examples helps them gain a better
7 perspective and insight to the issues so that
8 they can help convey concern to the surface
9 transportation or along with National Grain and
10 Feed and others. A lot of the other are producer
11 associations that participate in those
12 proceedings that the Surface Transportation Board
13 facilitates around these ag transportation
14 issues.

15 I would encourage folks that if you
16 got data, if you're collecting data concerning
17 the impact of transportation on the agricultural
18 operations, begin collecting it and sharing it
19 with those who are commenting on behalf of
20 agriculture. And particularly, you may want to
21 start engaging that process too as a GIAC or as
22 individual committee members and represent your

1 organizations or with NGFA because they've been
2 carrying this torch for a while.

3 And I think it's a difficult situation
4 to break through in terms of getting more
5 transparency. But we never know when we will
6 break through with the right type of engagement
7 and data. So that's just a general comment that
8 I have because the more people that understand
9 the impact that it's having, you never know what
10 type of outcome it may yield in the
11 deliberations.

12 MR. McCLUER: And Arthur, thank you
13 very much for that, for your work on this issue.
14 We do have a Rail Shipper/Receiver Committee.
15 And in fact, we're in the process right now of
16 drafting comments to submit to STB on the first
17 mile/last mile issue.

18 And many of the topics that were
19 discussed yesterday regarding the metrics, right,
20 I know that Jimmy brought up regarding the
21 metrics. A lot of those issues are being
22 addressed in those comments that'll be submitted.

1 So you are correct. We're very much involved in
2 this.

3 We have several transportation-related
4 committees within the association. So if there
5 is any -- and I think many of the issues that are
6 raised, as you said, are very important to our
7 members. And so I think any additional as Arthur
8 mentioned, any of the non-NGFA members that are
9 on here that participate in the advisory
10 committee or stakeholders that are participating,
11 anything that you want to submit to the STB, we'd
12 be happy to address maybe some of the questions
13 that you may have on some of these issues.

14 MR. NEAL: I know you didn't ask that
15 directly. That's really a decision you'll all
16 have to deliberate on. But the reality is that
17 data is key in this process. And the more
18 economic impact that can be demonstrated, I think
19 the better off and the stronger the arguments are
20 for greater transparency in the process that we
21 know has been impacting action.

22 MR. KERRIGAN: I appreciate those

1 comments, Arthur and Jess both. And I, Arthur,
2 you keyed in on something that this group does
3 more there. It's made up of more than just grain
4 shippers that may be an NGFA member.

5 I think my recommendation on this
6 given that it seems to get getting a lot more
7 traction, we know that things don't happen
8 quickly, is maybe we put this as a tentative
9 agenda item for the next meeting if we're going
10 to have one in the spring to discuss if there is
11 a role, what that role would look like from the
12 GIAC given our broad membership on the committee
13 itself to either pull in support, information,
14 and questions that may already be out there. Or
15 if there's anything that we can help groups or
16 even the GIAC itself gather data and information
17 to submit as well. Speaking of agenda items for
18 the next meeting, we know that the FGIS FDA MOU
19 subcommittee will continue work and will likely
20 be on the next meeting as well.

21 Are there any other topics that
22 anybody can think of that we want to make sure at

1 this point in time that make it to the meeting or
2 we'll want to consider for the meeting? The
3 group itself will likely have a call for agenda
4 items prior to the Federal Register notice as
5 well. But I did want to give others the
6 opportunity while we all are here together to
7 bring something up. Janice?

8 MS. COOPER: We traditionally get a
9 report on progress on implementing prior
10 recommendations from the committee. And I know
11 we worked on several of those action items. But
12 it would just be nice to do a recap of former
13 recommendations and what the status is. I think
14 that's usually an agenda item. So we'd just like
15 to see that back next time.

16 MR. KERRIGAN: Okay. Anything else?
17 Did your hand come back up again, Janice? I
18 looked down for a second there.

19 (No audible response.)

20 MR. KERRIGAN: Okay. With that,
21 again, I want thank Janice is the vice chair of
22 this committee, Nick who's the secretary of this

1 committee, as well as the rest of the members for
2 the robust discussion, the ongoing work outside
3 of just this day and a half meeting here.

4 Obviously, it takes time. It takes effort on a
5 volunteer basis.

6 So I do want to thank the group. I
7 want to thank FGIS staff as well as all of the
8 other members who are probably not on today who
9 you did line up to speak and give some updates to
10 the group as well as the other -- we're up to 65
11 total participants here, group and the peanut
12 gallery, so to speak, who chimed in to learn as
13 well as discuss and bring items to our attention.
14 So any closing comments from Arthur or anybody
15 else?

16 MR. NEAL: I just want to commend the
17 committee on its focus and dedication and
18 commitment and your attention. During virtual
19 meetings, it's not always the easiest. But I
20 mean, I really appreciate everybody's attention
21 and engagement on the topics.

22 I appreciate the comments that were

1 offered on the items that were on the agenda. I
2 do believe our next meeting will be more fruitful
3 from the standpoint of participation,
4 recommendations. The goal is to be hybrid where
5 we're in person and virtual next meeting.

6 Let's all send positive thoughts
7 across the countries that Omicron does not take
8 legs and grow so that we can engage in a more
9 familiar way. I just want to say that it's an
10 honor and a pleasure to be a part of this
11 industry. NEAGA had a meeting down in New
12 Orleans and celebrated resilience of the grain
13 industry.

14 And I can honestly say that this is a
15 resilient body. And we are glad to serve you.
16 We look forward to continuing to work
17 collaboratively with you.

18 And we've still got challenges ahead
19 of us. But I believe we're going to work through
20 each and every one of them successfully as we
21 dialogue and keep lines of communication open and
22 keep open minds. So I appreciate how you all

1 have supported FGIS, and we will continue to do
2 our very best to support you. Thank you.

3 And I want to thank Kendra as well for
4 helping to organize the meeting. It's a lot that
5 goes on behind the scenes. And she is a
6 perfectionist at times.

7 And so it can get a little stressful.
8 So we thank Kendra for all of her effort and we
9 thank all of the division directors and staff for
10 their contributions to updates on activities at
11 FGIS. Thank you all.

12 MR. KERRIGAN: Anybody else?

13 (No audible response.)

14 MR. KERRIGAN: With that, I'll
15 entertain a motion to adjourn this meeting.

16 MR. AYERS: So moved.

17 MR. KERRIGAN: We've got several of
18 them. All right. You get a big part of the day
19 back for everybody. Thank you very much, and
20 we'll see you on the next go around.

21 (Whereupon, the above-entitled matter
22 went off the record at 12:12 p.m.)

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In the matter of: Grain Inspection Advisory Committee

Before: USDA

Date: 12-16-21

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