

NACMPI Public Meeting
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Good afternoon. Thank you for the opportunity to talk about USDA's plans for a risk-based inspection system. My name is Ken Kelly and I represent the Center for Science in the Public Interest (CSPI). CSPI is a non-profit consumer advocacy and education organization focused largely on food safety and nutrition issues and is principally supported by over 900,000 subscribers to our *Nutrition Action Healthletter*.

The Food Safety Inspection Service is the public health agency at USDA responsible for ensuring the safety of meat, poultry and eggs products. The agency is facing public health and financial challenges that require it to use resources more effectively and efficiently. CSPI supports the concept of a risk-based inspection system that would allow the agency to improve its resource allocation to mitigate the impact of these challenges. However, CSPI has serious concerns that many in the audience today share regarding the implementation of a risk-based system.

There are several essential elements that must be in place if FSIS is to go forward with a risk-based inspection system. The agency must have a robust computer system and data infrastructure in place that can handle today's demands and those the agency will face in the future. This is crucial to the long-term success of a risk-based inspection. FSIS needs valid attribution data in order to determine risk. Currently information does not exist and to move forward without this information would do disservice to the agency's public health mission. FSIS needs unbiased scientific input on the concept of product risk controls. This includes consumer and public health input in its expert elicitation. FSIS must also address the issue of non-compliance reports and their use in the algorithm – the engine that will make this process move forward. The agency should undertake a comprehensive analysis of the current non-compliance report system, and develop a method to clearly identify and rank non-compliance reports that are food safety related.

In light of the concerns these concerns CSPI believes that the agency should not rush to implement a risk-based inspection system that will be inherently flawed. The agency should take its time and make sure this process is done right. Without this solid foundation, a risk-based system like the one being proposed will be a waste of time and resources with no real benefit to public health.