



Risk-Based Inspection (RBI)
Public Workshop
October 10 – 11, 2006

SMALL GROUP REPORT FROM
DAY 1 DISCUSSION
GROUP 1, ROOM 302



Product Inherent Risk

- Cannot talk about inherent risk without first commenting on the expert elicitation:
 - Good start - Need to take before another group of experts.
 - The scope was too narrow.
 - Issues about assumptions
 - Does the data bear out the rankings?
 - Cross-check the data with that in the public domain



Product Inherent Risk: QUESTION 1: Use median of the expert score?

- Yes, if refine and come out with closer spread.
- Median is best measure given the range of responses.
- No, would use formula more like that for HACCP: likelihood of hazard X severity of occurrence X likelihood of mishandling.
- Hard to say yes without knowing the context in which experts came up with their rankings.



Product Inherent Risk: QUESTION 2: How include thermally-processed, commercially sterile products?

- Agreement: should be included since inspected product.
- Fit in as lowest risk product.



Product Inherent Risk: QUESTION 3a: If further processing at another establishment?

- Product should have reduced risk. Should be same inherent risk as that of finished product.
- Risk should be assigned based on product that enters commerce.
- Might have to be case-by-case.
- Depends on a number of factors:
 - Intended use
 - Likelihood of mishandling
 - Whether or not lethality step at second establishment



Product Inherent Risk: QUESTION 3b: If further processing at retail?

- Agreement: Assign risk based on product risk at plant, without assessment of how used at retail.



Product Inherent Risk: QUESTION 4: How translate volume data into exposure variable?

- Look at the idea of a third axis for volume.
- Do additional analysis on how to integrate volume data as an establishment attribute or on its own.
- Use “plant profile” establishments fill out. Ask for estimate of volume once a year.



Product Inherent Risk: QUESTION 5

How account for establishments that produce more than one product?

- For public health, base inherent risk rank on most risky product.
- Factor in frequency: some plants may process risky product infrequently.
 - Agency may be able to flag low-volume, high-risk product production and have inspector present
- Consider mapping where all plant's products fall on the grid to make determination



Product Inherent Risk: QUESTION 6

How account for severity?

- Severity must be factored in, particularly as it relates to vulnerable populations.
- Use the experience of risk assessment experts out there who have done this.
- Use severity data from CDC.
- Could adjust initial rankings based on severity.
- It looks like severity was factored in given the high numbers for raw products.



Establishment Risk Control: QUESTION 1: Adequate components?

- Agreement: Food defense should not be a factor in determining how to allocate inspector resources. It is, however, very important and should be part of the system design.
- Other components seem appropriate, but concern about data that support them.



Establishment Risk Control:

QUESTION 2: Should components be weighted?

- If you do not have data that accurately reflects reality, you cannot make an accurate determination of risk.
- Hard to answer this question, because of concerns about the reliability of data for components.
- Pathogen control:
 - The data are more objective
 - It does have more of a public health impact
 - FSIS may be limiting itself if industry data does not play a role
- System design:
 - a fairly objective measure.
 - If validated interventions are part of system design, design should be weighted higher because of public health impact.



Establishment Risk Control: QUESTION 3: Other useful information?

- Public health data, e.g. could sync up with geographic data.
- Data needs to tie system to a decrease in foodborne illness.
- Attribution data from CDC and the Agency (for both inherent risk and risk control).



Establishment Risk Control: QUESTION 4: Ways other than FSAs to assess design?

- PBIS data can be used in assessing design and implementation – capture the positive, not just NRs.
- Company 3rd party audits
- Information from local inspectors and inspection supervision and management



Establishment Risk Control: QUESTION 5: NRs inclusive?

- The NRs still need more narrowing - some more food safety-related than others



Establishment Risk Control:

QUESTION 6: Look back period?

- Should be at least a year to account for seasonality
- There should be a rolling window, not just a fixed snapshot
- It should depend on what aspect of system you are looking at.
- If new technology is introduced at establishment that, e.g., reduces pathogens, look back period should be shorter
- Weight more recent data more heavily



Inherent Risk Index

Likelihood of food safety Hazard	X	Severity of hazard	X	Likelihood of consumer mishandling	X	Volume Factor
(1-10)		(1-10)		(1-10)		(1-10)