



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

SMALL GROUP REPORT FROM
DAY 1 DISCUSSION
GROUP 3, ROOM 303



Establishment Risk Control: 6

Components Appropriate & Adequate?

- **Food defense should not be a component of the RBI model**
 - Food defense should be examined, but not as part of daily inspection process; handle as part of other FSIS activities
 - RBI should drive food defense
- Roll in-commerce and enforcement into one component
- Add intended use of product as component



Establishment Risk Control: 6 Components Appropriate & Adequate?

- **Some classes of consumer complaints lack supportive data and may therefore be unreliable**
 - Need detailed categories of consumer complaints made available to public



Establishment Risk Control: Some Components Weighted More?

- **Yes, but need more thinking from FSIS and stakeholders on structure of weighting**
 - In-commerce findings for foodborne illness outbreaks should be weighted more
 - Food safety system design and implementation (i.e. what plant is doing) should be weighted more than other components
 - Weighting should be flexible and able to incorporate new information



Establishment Risk Control: Other Useful Information re: Establishment Risk Control for FSIS Consider

- Consider food safety interventions for all types of products
 - Need to clearly define “interventions”; defined, validated, weighted
 - Consider differences of scale among plants
 - Important for the purposes of RBI
- Look at plants’ data to see whether it supports the processes they use



Establishment Risk Control: Other Ways than FSAs to Evaluate Food Safety System Design?

- **FSIS should use industry data**
 - Establishments collect data more frequently than FSIS and sometimes more than regs require > this data needs to be considered
 - FSIS could collect information re: establishments' chosen control measures (ex. questionnaire on implementation of design) with option for industry to provide data to FSIS > help differentiate X-axis
 - Data sharing could be mandatory; rewards for "good" plants and penalties for "bad" plants



Establishment Risk Control: Other Ways than FSAs to Evaluate Food Safety System Design?

- FSAs are expensive, inefficient, and put burden on FSIS and taxpayers; some plants gain economic advantage by consistently skating on the edge of acceptable
- Another approach is needed:
 - If plants were required to validate HACCP is working, it could generate more information about whether system is working
 - Establishments ought to take on cost if they require extra FSIS oversight because of poor sanitary practices
 - If a plant does well, there could be incentives



Establishment Risk Control: Other NRs for FSIS to Consider

- Group 3 did not cover NRs due to time constraints and recognition that many participants commented on NRs in previous Day 1 sessions



Establishment Risk Control: Appropriate Look-Back Period

- Hold data long enough to make an adequate assessment and a clear determination



Other Input / Comments

- FSIS ought to identify its own weak spots
- Need to include input and expertise of inspectors in development of RBI
- Inspectors should not get involved with out-of-plant / in-commerce findings
- May not be a penalty to be inspected more, it is a re-allocation; inspection could decrease if doing a good job
- FSIS might need to go back to Congress to gain authority over shipping decisions??



Questions for FSIS

- What does “in-commerce” mean?
- Will there be an appeal process for “level” assigned to an establishment?
- Will there be a venue or vehicle for expedited re-assessment?