RISK-BASED INSPECTION QUESTIONS & ANSWERS

1. What is risk-based inspection?

Between 1998 and 2000, the Food Safety and Inspection System transitioned from an inspection system that relied primarily on sight and smell to detect possible contamination of meat and poultry to one in which science and microbiological testing played major roles. The new system was called Hazard Analysis and Critical Control Points (HACCP) and it required plants to design their food safety systems to prevent product contamination by foodborne pathogens. Each establishment's HACCP plan must identify how it will prevent contamination from all hazards, including the pathogens most likely to present a hazard. For example, E. coli O157:H7 is a hazard for ground beef production, while Listeria monocytogenes is a hazard of concern for producers of ready-to-eat meat and poultry products. HACCP has led to reductions in foodborne illness, as measured by the Centers for Disease Control (CDC). Now, FSIS intends to better utilize the information regularly collected by inspection program personnel in carrying out daily inspection activities to further improve public health. By taking into account the relative risk of what each plant produces (product inherent risk (PIR)) and how each plant is controlling risk (establishment risk control (ERC)), FSIS intends to allocate more inspection resources to those plants needing it the most, while continuing to do daily inspection at all facilities. This enhanced inspection will provide greater confidence that meat, poultry and egg products are safe. Through this process, FSIS hopes to proactively identify and prevent situations that could negatively impact public health. Risk-based inspection will be focused on processing plants and will be phased in over time as each component is thoroughly evaluated and analyzed and improvements are made. The system has been designed using a fully transparent process that has drawn upon the input and expertise of all stakeholders.

2. How would risk-based inspection differ from the way inspection is currently done at processing facilities?

Currently, inspection program personnel carry out assigned tasks at processing establishments daily and take enforcement action when necessary to ensure that meat, poultry and egg products are safe, wholesome and accurately labeled. About the same amount of time and inspection resources are devoted to each plant, irrespective of the differences in what plants produces or their level of risk control. From information generated by inspection program personnel, it is apparent that not every facility has an equal potential to negatively impact public health. For the first time, inspection program personnel will have the benefit of an objective determination of a plant's overall record. Rather than being assigned inspection tasks, inspection program personnel will be able to utilize their training and experience to more effectively focus inspection activities on those plants and processes needing the most attention.

3. Has FSIS utilized the concept of risk before?

Yes. HACCP itself is a risk-based concept because it requires plants to identify and mitigate those risks most likely associated with its production. FSIS tests for *Listeria monocytogenes*

(Lm) more frequently at plants that do not utilize processes known to eliminate or prevent the growth of Lm in ready-to-eat products. Last year, FSIS announced an initiative designed to reduce the incidence of *Salmonella* in raw poultry that calls for increased inspection activity and testing at plants that cannot demonstrate consistent control of *Salmonella*. While FSIS regularly applies risk-based concepts to inspection activities, this initiative will apply risk in a more robust and science-based manner.

4. Is risk-based inspection designed to save money or eliminate inspection program personnel?

Applying risk-based inspection in processing plants will not reduce the amount of money FSIS dedicates to inspection activities nor will it reduce the number of inspection program personnel. Risk-based inspection is designed to apply the information regularly collected to better predict and prevent public health threats from food.

5. How will a plant's track record be updated?

The calculation of a plant's track record will be continually updated. It will be based on the most recent six months of data. As month seven data is added, month one data will be eliminated from calculations. This system ensures that inspection decisions can be continuously updated when conditions change at any plant for any reason.

6. When will risk-based inspection begin?

In the near term, risk-based inspection in processing establishments may be implemented at 30 prototype locations beginning as early as April 2007. After a thorough evaluation and recommendations for improvements are made, FSIS hopes to expand the number of locations to 150 by the end of 2007. Longer term, FSIS expects to expand risk-based inspection nationwide. FSIS also expects to identify and collect the data needed to demonstrate that risk-based inspection is achieving the desired public health goals.

7. FSIS has held a number of public meetings to gather input on risk-based inspection. Will this process continue in 2007?

The planning and implementation of risk-based inspection has been fully transparent from the beginning and will continue in that manner. FSIS intends to hold a series of technical meetings with stakeholders in 2007 regarding specific aspects of risk-based inspection, such as; the use of production volume in making inspection decisions; the use of industry data to supplement FSIS inspection findings; the use of non-compliance records; and the on-going use and design of expert elicitation and incorporation of the outcomes of these elicitations.