



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

SMALL GROUP REPORT FROM
DAY 1 DISCUSSION
GROUP 2 – ROOM 317



Product Inherent Risk: QUESTION 1

- Lot of desire to reexamine the ranking. For the Expert Elicitation ...
 - Was the science used ‘correct’?
 - Problems with the assumptions (e.g., was it right to remove severity from the analysis?)
 - Was the expertise represented broad enough?
 - Why doesn’t the paper include the experts rationale?
- What has FSIS done to validate the ‘median’
 - Not sure what FSIS intends to do with the number
 - Need to validate the model and results; put mechanisms in place to get attribution data



Product Inherent Risk: QUESTION 2

- Rank them as high risk (absent 'exquisite' degree of control)
 - If process breaks down there are big consequences
 - If don't rank high, there won't be any inspection there



Product Inherent Risk: QUESTION 3

- May not need to factor in 'for other establishment'
 - Makes sense except for assumption in Expert Elicitation that consumers will deal with appropriately (Page 8, Bullet #2 – RTI Memo)
- For this purpose, every plant should stand on its own merits
 - Partial rationale: need to consider physical and chemical concerns (in addition to biological)



Product Inherent Risk: QUESTION 4

- Options:
 - Directly relate to how much volume produced
 - Dependent on complexity of the system (e.g., number of products at plant)
 - 3 dimensional -> Z Axis
- Minimum amount of inspection at every plant dependent on volume
- When at high-risk levels (#5) doesn't matter about volume, need lots of inspection



Product Inherent Risk: QUESTION 5

- Options:
 - Take 'riskiest' product and apply to the full establishment (most conservative approach)
 - If trying to allocate resources to riskier plants then use 'riskiest' but balance against volume
 - However concern about cross-contamination



Product Inherent Risk: QUESTION 6

- Options:
 - Severity shouldn't have been removed from ranking considerations – very, very difficult to reconcile if not included
 - Trying to include in first part (ranking) is too difficult; need to do in two parts/steps
- Depends on product type and who it is intended for
- If wide ranging product then look at riskiest population



Establishment Risk Control: QUESTION 1

- Issues:
 - Overlap in the wheel
 - NOIEs and NRs – potential for ‘double-dipping’
 - Need accurate picture of inspection
 - Major problem if inspection not occurring at plants
 - Lack of consumer information
 - Concern with “verified and validated consumer complaints” – not clear what it includes or how it is defined
 - Food defense
 - What is FSIS trying to do? Doesn’t need to be included (or at least very, very, low priority)



Establishment Risk Control: QUESTION 1

- Issues (cont.):
 - Subjectivity
 - With reliance on NRs there are real concerns about ‘good’ plants being categorized as ‘bad’ plants and vice versa ... very subjective “data”
 - Data Collection
 - Agency will have to come up with way to factor in missing data
 - Could improve NRs process/forms to be more statistically significant but still need subjective component
 - Entire system has to be a living breathing thing
 - Need QA, QC, and feedback loops ... and have to adjust when mistakes made/additional information incorporated