United States Department of Agriculture
Food Safety and Inspection Service

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

SMALL GROUP REPORT FROM DAY 1 DISCUSSION

GROUP 4, ROOM 244

Group 4

- Focused on Establishment Risk Control
- Discussed the six questions and some additional ideas, questions, and comments
  - Detailed level of components of the equation
  - “Big Picture” issues (i.e., “command and control,” roles and responsibilities, data integrity, and quantitative and qualitative factors)

Establishment Risk Control: QUESTION 1

- Are these 6 components appropriate and adequate?
  - Suggested gaps:
    - Attribution data
    - Adequately capturing consumer complaints that do not go to FSIS
    - For the plants that do not have pathogen testing programs, how is this considered in the equation?
  - Question: If algorithm or equation is driving concept, should non-quantitative information be removed?

Establishment Risk Control: QUESTION 2

- Are some components more important than others, and how should they be weighted?
  - Yes, some are more important than others
    - Less Important
      - Food Safety Defense
        - » Important issue, but should be minimized as a component in this equation
      - Enforcement Actions
        - » Important issue, but can it be folded into Design Implementation?
        - » Lack of enforcement actions does not equal no food safety issues or need for review and possible improvements

Establishment Risk Control Question 2

- Some components more important than others?
  - System Design and System Implementation are very important and should be closely linked
    - Some think these two components are the most important and from these two, the other components flow
    - Questions:
      - If algorithm is key, should qualitative data be used?
      - How and in what way is qualitative information and data factored in?
        - » Data-driven system is important – how achieve this?
        - » Reviewing only paperwork (NRs) is not sufficient – need to go into the plants to see what is happening first hand.

Establishment Risk Control Question 2

- Some components more important than others?
  - Pathogen Control and In-Commerce Components also are very important
    - Did not draw conclusions about relative importance, focused more on aspects of these components
  - Pathogen Control
    - Not all plants have pathogen testing programs – how is this taken into consideration in the equation?
  - In-Commerce
    - Inclusion of attribution data – some thought that this data should be the primary driver of the system.

Establishment Risk Control: QUESTION 3

- Is there other useful information about establishment risk control that FSIS is not considering?
  - Yes:
    - Consumer complaints not directed to FSIS
    - Attribution data
    - (See gaps in components in Question 1)

Establishment Risk Control: QUESTION 4

- Are there other ways besides Food Safety Assessments to evaluate establishment food safety system design?
  - Discussion of “command and control,” whether the current system has too much or too little, whether a more robust RBI system should have more or less, and roles and responsibilities of industry and government
    - Some think there is not enough command and control in the current system, more should be incorporated, and that industry should design systems (HACCP) and government should validate – combination gives consumers more confidence.
    - Others think the current system has too much command and control, it should be reduced, and industry should have the lead role with designing in-plant systems as it is their reputation at stake, their responsibility to produce safe food and product, and they have the best ideas for designing the system. Government should verify the design and validation of its implementation.

Establishment Risk Control Question 4

- Are there other ways besides Food Safety Assessments to evaluate establishment food safety system design?
  - FSAs do represent information in-hand
  - Discussion of how, when, and in what way quantitative data and qualitative data are considered.
    - If algorithm is driving the baseline of inspection level, then qualitative information should be removed – use only quantitative data that can have a numerical value.
    - At some point in the evaluation of an establishment's food safety system design and implementation, someone needs to go to the plant and look at what is happening – data only analysis is not adequate.

Establishment Risk Control: QUESTION 5

- Are the NRs FSIS is considering public health-related inclusive or are there others FSIS should be considering?
  - NRs are tools and represent data in-hand.
  - Need to speed up appeals process.
  - Appealed NR should not be considered in equation until resolved.
  - FSIS is on the right track and needs to evolve the approach more.
  - Need to have a clear process as to how determine which NRs are health-related and which are not.

Establishment Risk Control: QUESTION 6

- What is the appropriate look-back period?
  - Clarification that this represents a moving window for data collection.
  - Perhaps a baseline could be a year and adjustments can be made up or down as appropriate (based on seasonality, type of products, etc.).