# Using Risk to Direct In-Plant Processing and Off-line Slaughter Inspection Activities

# Bobby Palesano Office of Policy, Program and Employee Development

# **Key Points**

- All processing plants continue to have daily inspection
- Focuses on processing and off-line slaughter inspection activities e.g., does not cover carcass by carcass inspection
- Implementation of Risk-Based Inspection in processing is a multi-phase process to allow adequate time of inspection program personnel to familiarize themselves with the system
- Training will be provided to inspection program personnel
- Allows time for programming of computerized Risk-Based System and for the development and delivery of training
- Under Risk-Based Inspection, the inspection level will be based on a combination of the plant's ability to control the risk and the inherent risk of the product
- Noncompliance records will continue to be documented for regulatory noncompliance, but not all NRs will be treated equally when determining the plant's ability to control the risk

# **Implementation Proposal**

- During the period that the scheduler is turned off, inspection program personnel will familiarize themselves with situations that could be predictive indicators for basis of concern, e.g., construction in a RTE operation, new suppliers of raw materials, significant employee turnover
- Should we use predictive indicators?
- How would we capture predictive indicators?

# **Implementation Proposal**

- What are other examples of predictive indicators?
- Inherent risk and risk control are combined to calculate an "inspection level" for each establishment

| Υ      |            |          |               |
|--------|------------|----------|---------------|
| High   | Level 2    | Level 3  | Level 3       |
| Medium | Level 1    | Level 2  | Level 3       |
| Low    | Level 1    | Level 1  | Level 2       |
|        | Consistent | Variable | More Variable |

**Risk Combinations** 

Establishment Risk Control

Inherent Product Risk

Х





**Establishment Risk Control** 

Inherent Product Risk

Χ

### Questions

How many levels of inspection are optimal?

# Questions

How do plants move from one level to another?

#### Questions

How frequently should FSIS evaluate data to make decisions on the plant moving from one level to another?