



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

SMALL GROUP REPORT FROM  
DAY 1 DISCUSSION

Remote Sites



## 3 Sites Sent In Reports

- Springdale, AK – 2 Groups
- Chicago, IL
- Palmyra, PA



# Product Inherent Risk: QUESTION 1

- Alternatives to using the median scores from the expert elicitations?
  - Consider throwing out the outliers
  - Plant historical data should be used
  - NRs should not be used because they are too subjective
  - Moving forward data should drive inherent risk
  - Weight of each factor should be known
  - Need to base inherent risk algorithm more on data than on compliance (i.e., NRs)



## Product Inherent Risk: QUESTION 2

- How should thermally processed commercially sterile products be considered?
  - How will low water activity shelf stable products fit into this range of species process? Values?
  - This category should be considered in the lowest risk
    - level 1 (2 comments).
  - These products should be considered GRAS
  - Should be included by its own species/process



## Product Inherent Risk: QUESTION 3

- If further processing is conducted at another establishment or at retail, how should this be considered?
  - Consider the inherent risk of product as shipped from Establishment.
  - Each facility should stand on its own.
  - Retail should stand on its own.
  - The further from the producer, the higher the risk.
  - Risk should be part of the calculation for the establishment that is doing the further processing



## Product Inherent Risk: QUESTION 4

- How do we translate volume data collected for each type of processed product produced at each establishment into an exposure variable for that establishment?
  - By product group and process
  - Weight factors by species product and type.
  - Depends upon each product produced and with good HACCP plans with good CCP controls.
  - Take it out of the algorithm, consider it as a separate factor, and triangulate it with the X and Y axes



## Product Inherent Risk: QUESTION 5

- Given that most establishments produce more than one type of product, how should inherent risk data for each establishment be presented?
  - By product group (2 comments)
  - The median approach is the most practical. If the worst case scenario is used, it needs to be modified by frequency of production and volume. 3<sup>rd</sup> approach would be to go to the product production or slaughter in the greatest volume.
  - Weight risk scores based on annual production by product type (e.g., raw versus RTE).



## Product Inherent Risk: QUESTION 6

- How should we account for severity of possible illness when calculating the risk inherent to each type of meat or poultry products?
  - Should be paired up with exposure proxy in some way.
  - Do not need to consider severity of illness to each type of meat or poultry products (at this time).
  - A political issue. Give a strong push to *E. coli* 0157:H7.





## Establishment Risk Control: QUESTION 1

- 6 components appropriate and adequate?
  - NRs should not be a weighted factor because they are subjective opinions.
  - Okay for now. Perhaps include some training for industry, FSIS, and consumers.
  - Components are appropriate and adequate.
  - Although important, Food Defense does not seem appropriate in this category.
  - Need to be careful about including Enforcement Action – after an EA, an establishment often adopts better food safety controls.



## Establishment Risk Control: QUESTION 2

- Are some components more important than others, and thus should some be more weighted than others?
  - Appeals should be considered fully before utilized in equation.
  - One view is that Food Safety Design and Food Safety Implementation are the two most important.
  - Should consider sampling/pathogen testing as part of System Design rather than as a separate category.
  - Decisions should be based on industry and FSIS agreement.
  - Pathogen Control and System Design are the most important.
  - Pathogen Control, System Design, In-Commerce, Food Defense should have more consideration.



## Establishment Risk Control: QUESTION 3

- Is there other useful information about establishment risk control that FSIS is not considering?
  - In-plant microbiological testing, 3<sup>rd</sup> party audits (if applicable).
  - Let's keep it simple!!!
  - Should add: Implementation of Food Safety System, HACCP deviations, and SSOP deficiencies involving product and contamination.
  - Question: Page 9, what does this mean, "FSIS is currently reviewing NRs to validate these categories"?



## Establishment Risk Control: QUESTION 4

- Are there other ways besides Food Safety Assessments to evaluate establishment food safety system design?
  - The current FSA method is becoming very effective and seems to be working well.
  - Look at end results.
  - Microbiological data.
  - Consumer complaints.
  - For now – okay.
  - NRs should be identified as food safety-related or not.
  - Be careful not to go back to the minor, major, critical system.
  - Corporate company audits (if applicable) and company FSAs.



## Establishment Risk Control: QUESTION 5

- Are the NRs FSIS is considering public health-related inclusive or are there others FSIS should be considering?
  - Non-compliance records (NRs) should not be considered at all.
  - Perhaps we should go back to the minor, major, critical system.
  - No, there are not other considerations other than public health-related NRs for FSIS to consider.



## Establishment Risk Control: QUESTION 6

- What is an appropriate look-back period?
  - A one year look-back period would smooth out fluctuations.
    - If this would require an assessment of a one-year period's records, it may have a considerable impact on the time it takes to do an assessment.
  - One year – takes into account seasonality (2 comments).
  - At least one year, and the shelf-life date if it is longer.