



# Measuring Establishment Risk Control for Risk-Based Inspection

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# **Risk-Based Inspection (RBI)**

**FSIS is developing a new system of inspection to better allocate Agency resources to control the risks posed to the public health by meat and poultry products.**



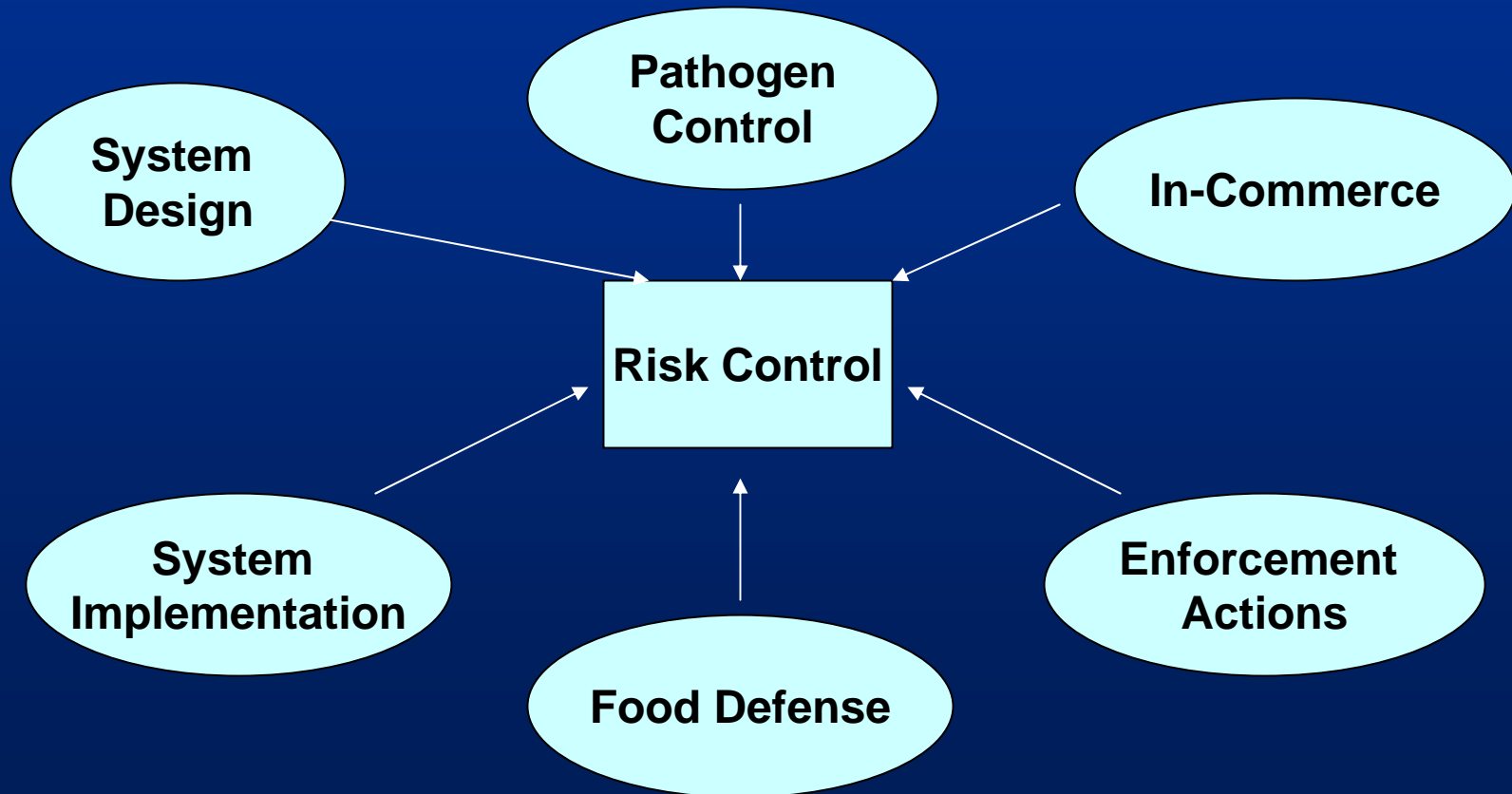
# RBI and Measures of Risk

**Allocation of Agency resources under RBI at each inspected processing establishment will rely upon two measures of risk:**

- **Inherent Risk:** a measure of the inherent risk posed to the public health by each type of processed meat and poultry product, assuming typical process control by the producing establishment, and;
- **Risk Control:** a measure of the amount of actual risk control achieved by each establishment.



# Establishment Risk Control





# Food Safety System Design

**Objective:** Gauge efficacy of the design of the establishment's Food Safety system

- Food Safety Assessment (FSA) findings
- 9 CFR 430 RTE *Lm* control alternative 1, 2, or 3
- Other?



# Food Safety System Implementation

**Objective:** Measure consistency of Food Safety system implementation

- FSIS continues under RBI to document all regulatory non-compliances
- Only significant NRs related to public health are considered in the risk control measure



## Implementation (continued)

- We received input from NACMPI regarding NRs with public health significance
- FSIS is considering NRs that cite 416.15 (Sanitation Corrective Actions) / 417.3 (HACCP Corrective Actions); those for which regulatory control action was taken; those issued for inadequate validation or verification; and possibly others
- FSIS is currently reviewing NRs to validate these categories



# Pathogen Control

**Objective:** Measure pathogen control effectiveness

- RTE testing program results
- *E. coli* O157:H7 testing program results
- *Salmonella* verification category
- Suppliers to establishments with *E. coli* O157:H7 positive test results
- Agricultural Marketing Service school lunch program testing results





# In-Commerce Findings

**Objective:** Measure how well establishments prevent shipping products with hazards

- Significant public health, verified (traced-back), and validated consumer complaints
- Class I or II recalls
- Product control actions (detentions, seizures)



# Enforcement Actions

**Objective:** Capture enforcement-related indicators of loss of process control

- Enforcement actions not captured elsewhere

(e.g. NOIEs not resulting from FSAs or repeated NRs; injunctive actions, consent decrees, and reinstatement of suspension after failure to meet corrective actions under deferral)



# Food Defense

## **Objective:** Measure Food Defense Risk

- Product/Process Vulnerability
- Production Volume/Exposure
- Food Defense Plan Efficacy
- Food Defense Verification Results



# Question 1

Are these 6 components appropriate and adequate?



## Question 2

Are some components more important than others, and thus should some be weighted more than others?



## Question 3

Is there other useful information about establishment risk control that FSIS is not considering?



## Question 4

Are there other ways besides Food Safety Assessments to evaluate establishment food safety system design?



## Question 5

Are the NRs FSIS is considering public health-related inclusive or are there others FSIS should be considering?





# Question 6

What is an appropriate look-back window?