

National Advisory Committee on Meat and Poultry Inspection

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Issue: Risk-Based Sampling Issue Paper

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The task of this Sub-Committee is to provide guidance to the FSIS on how to more effectively develop risk-based verification testing programs addressing the unique considerations associated with small plants (between 10 and 499 employees) and very small (less than 10 employees.)

1. While the FSIS recognizes that small and very small plants present unique considerations, this Sub-Committee believes that all of the five risk factors presently used in designing risk-based sampling (type of control measures; product type; compliance history; validation systems, and volume of production) apply to all plants, regardless of size.
2. The Sub-Committee also believes that there are a number of factors which need to be taken into consideration – beyond the five which are already in-use. Additional factors are not necessarily unique to small and very small plants when the FSIS designs a risk-based sampling, but instead provide a more targeted focus for data collection and analysis. Such factors could include:
 - a. Employee turn-over
 - b. Ratio of number of employees to volume of production
 - c. Number of production steps
 - d. Seasonal production
 - e. Amount of on-going, good, sound data collection by the plant
 - f. A niche or cultural specialty related to the product or the process employed
 - g. Physical geography (such as altitude, climate, humidity, distance to customer base, etc.)
3. One suggestion by the Sub-Committee as a way that FSIS can conduct risk-based sampling more efficiently in all plants is to refine the risk criteria by creating categories or scores that utilize the above additional risk factors. This new set of factors should not focus on plant size, but rather on weighted risk factors including data from industry (plant-specific data,) FSIS (including sampling results and generic industry data,) and the

CDC (public health data.) This will ensure that the agency uses a complete set of risk factors to develop verification protocols.

4. The Sub-Committee is not aware of any unique business practices of small and very small plants that relate to specific pathogens. Rather, the Sub-Committee recommends that the agency focus on risk-sampling related to pathogens of public health concern. The agency should consider the inclusion of an expanded list of factors. To further implement this more targeted sampling:
 - a. The Sub-Committee urges the agency to seek approval to obtain additional information from all plants in order to more effectively focus its risk based sampling efforts using an expanded quantity of risk factors such as those listed above. Likewise, there needs to be a system in place to maintain the confidentiality of the information collected. For example, FSIS could consider data acquisition through a third party or a land grant university.
 - b. Create a communication plan to insure a clear understanding that the data collection and even the “risk category” of an establishment is not an indication of compliance or a lack of compliance, but rather the overall categorization of a set of risk factors for analysis and sampling frequency consideration. For example – a plant might require a higher frequency of sampling because of the type and volume of its product even though it has an excellent history of food safety compliance.
 - c. FSIS and CDC should continue to pursue attribution data through Food Net to aide in targeting resources to insure pathogen reduction/control and improvement in overall public health.
 - d. FSIS should focus resources on the pathogen of most public health significance. Using Healthy People goals will allow the Agency to identify where to focus its efforts on sampling for pathogens. Two “levels” of sampling could be established, for example, at the maintenance level when a HP goal is achieved and a higher level for pathogens that have not met the goal reduction.