

**National Advisory Committee on Meat and Poultry Inspection
November 2005**

Sub-Committee Number 1

Issue: *Risk-Based Inspection*

2. What inspection criteria would be appropriate in designing and implementing RBIS?

a. How would the success of RBIS be measured?

The subcommittee agrees that these three issues are appropriate questions to consider in the deployment of resources in a risk-based system. FSIS should evaluate each proposal to specifically address how each would be incorporated in a resource deployment plan. The primary focus of resource deployment should be on the reduction or elimination of public health threats that are most likely to occur.

Consideration of the likelihood of various hazards is an important factor in determining resource deployment. While this seems to capture the intent of a risk-based approach this particular question appears to be too broad. FSIS should conduct analysis to specifically determine what data would best support the determination of the likelihood of a hazard to occur.

Gaps in data need to be identified as well as an evaluation of currently available FSIS data and the appropriate use of this data in allocating resources. Determine additional data needs that will enable the agency to implement a risk-based inspection system.

With respect to the stated question, FSIS should do the following:

- Review the impact that various processes and technology have on risk (e.g. manually intensive plants vs. large highly automated plants).
- Evaluate current research and data regarding the likelihood of various hazards occurring and how variables such as product, processes, species, historical plant performance as well as seasonality impact risk. (e.g. higher prevalence of *E. coli* O157:H7 during summer months).
- Evaluate which hazards would have the most significant impact on public health. Severity of effects should be considered.

On-going assessment of establishments' food safety system could help FSIS focus resources where they are most needed. Through testing and continuous evaluation of the effectiveness of interventions, FSIS may be able to more effectively allocate resources to address food safety problems proactively. The agency should review its data and processes as they relate to resource allocation and utilizing a risk-based approach.

b. Are there any other ideas or recommendations the Committee might offer FSIS in designing and implementing RBIS?

To establish an inspection system that is responsive to inspection findings the agency seeks to apply decision criteria. Decision criteria for inspectors are currently used in the field. The agency states that this methodology has been well received by inspection personnel and believes it has been an effective tool. The committee recommends additional evaluation regarding the effectiveness of the current decision criteria process. This process also needs to be flexible enough to efficiently address changes in inspection procedures/best practices. The evaluation could include a thorough review of the data provided by the Performance Based Inspection System.

Opportunities to investigate:

- Evaluate basic inspection procedures. Define inspection in today's environment.
- Understand the industry's top food safety practices to identify current standards utilized to ensure production of safe food.
- Evaluate current HACCP work assignment split (70% food safety and 30% other consumer protection procedures) to determine if efficiencies can be gained in agency focus on food safety issues versus other consumer protection issues.
- Evaluate current practices to identify opportunities to improve plant/inspector collaboration.
- Capture industry success regarding food safety intervention. Engage in the development of best practices aimed at protecting public health.

The Subcommittee feels the additional aspects of inspection need to be addressed at a later date and additional background information should be provided by the agency.