Risk-Based Inspection

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Purpose of Inspection

Traditional Approach

- Designed to find problems if they occur

Risk-Based Approach

- Designed to find problems that occur
- Designed to anticipate problems, thereby minimizing risk

Deployment of Resources

Traditional

- Based on what needs to be done
  - Inspecting carcasses
  - Making inspection once per plant per shift

Risk-Based

- Align resources also with level of risk:
  - Hazards based on type of species and process
  - Likelihood hazard will exist in plant
  - Significance of effects
  - Ongoing assessment of food safety system

Role of Data

Assess risk:

- Public health risk posed by different types of products
- Significance of risks
- Plant performance history
- Approximate volume of various types of products

Work to Be Done

Traditional

- Perform assigned procedures
  - Under HACCP, 70% food safety and 30% other procedures

Risk-Based

- Varies based on risk
  - Basic procedures
  - Others based on inspectional findings and decision criteria

Role of Data

Data will guide:

- How to appropriately assess performance
- Development of decision criteria

Activities of Inspection Personnel

Traditional

- Procedures designed to find non-compliance

Risk-Based

- Focused on where loss of control:
  - Is more likely to occur
  - Would have serious public health consequences
- Intensify inspection if plant is losing/has lost control

Role of Data

- Identify plants where problems may be developing
- Develop and maintain performance standards

Response to Inspection Findings

Traditional

- Evidence of compliance or non-compliance has no effect on intensity of inspection.
- Evidence of non-compliance could lead to enforcement action.

Risk-Based

- Evidence of non-compliance could lead to enforcement action.
- Intensity of inspection based on findings:
  - Good control = less intense inspection
  - Losing control = intensified inspection

Role of Data

- Data on results needs to be available to inspection personnel on a timely basis
- Develop tools to help in analysis of data

Response to Emerging Problem

Traditional

- Not designed to have inspectors make a judgment about risk of non-compliance

Risk-Based

- Inspection personnel would have flexibility, data, responsibility and training to be able to focus on emerging problems

Role of Data

- Enable inspection personnel and analysts to identify plant trends and potential emerging public health issues
- Help FSIS to identify parameters that will signal a trend

Factoring in Food Defense

Traditional

- Food defense procedures performed with specified frequency

Risk-Based

- Food defense procedures performed at frequency appropriate for national security situation and security situation in establishment

Role of Data

- Determine extent of plant's attention to food defense matters
- Results of FSIS verification activities

Attention to Product in Commerce

Traditional

- Random visits to facilities that handle meat and poultry products to ensure conditions are sanitary

Risk-Based

- Scheduled visits to facilities based on findings and other information

Role of Data

- Assess risks that products are subject to in commerce
- Determine conditions and regulatory history of facilities that handle products

Questions for the Committee

- What inspection criteria would be appropriate in designing and implementing RBIS?
  - How would the success of RBIS be measured?
  - Are there any other ideas or recommendations the Committee might offer FSIS in designing and implementing RBIS?

Questions for the Committee

- What data would be appropriate in designing and implementing RBIS?
  - How should the Agency obtain the data?
  - Is the Committee aware of data the establishments or their customers use to identify emerging problems? How can FSIS access this data?
  - If industry data is used, how does FSIS ensure data quality?