

National Advisory Committee on Meat and Poultry Inspection

Risk-Based Inspection Issue Paper

Purpose

FSIS is seeking further guidance from the National Advisory Committee on Meat and Poultry Inspection on data and inspection (RBI) systems. RBI procedures are being designed by FSIS to replace traditional inspection systems for both slaughter and processing operations. Under an optimal RBIS, the type and intensity of inspection activity at each establishment would be determined by an analytical process that permits inspectors to anticipate problems and focus their efforts on those processes and establishments most likely to have control issues and pose a public health risk. This will require, among other things, new data systems for the agency to collect, assess and respond to public health data. This will allow FSIS to more fully operate under the traditional public health model of assessment; policy development and assurance.

Background

FSIS' public health mission is to prevent foodborne illnesses and ensure a safe food supply. To be effective, the Agency's inspection resources need to be allocated in proportion to the public health risk presented by the establishments and products being inspected.

The 1996 Pathogen Reduction Hazard Analysis and Critical Control Point (HACCP) Systems rule represented a fundamental shift in the Agency's approach to inspection. The HACCP rule clarified and distinguished the food safety roles and responsibilities of industry and FSIS. Under the HACCP rule, industry is responsible for assessing potential food safety hazards and systematically preventing and controlling those hazards. FSIS is responsible for verifying that establishments' HACCP systems are working – that they prevent adulterated meat and poultry products from entering commerce.

The introduction of HACCP initiated the ongoing evolution of a risk-based inspection system. It requires establishments to identify critical points in the production process where hazards could render the product injurious to health and to address those hazards in their HACCP plans. Also, the rule provided a basis for FSIS to explore new systems of slaughter inspection with the HACCP-based Inspection Model Project (HIMP). HIMP assessed whether slaughter establishments could adequately sort carcasses and parts for food safety and other consumer protection defects, and whether FSIS could verify the success of the establishment's efforts.

The next step in implementing risk-based inspection systems was the interim final rule for *Listeria monocytogenes* (Lm) in certain ready-to-eat products. This regulation, based on a scientific risk assessment, provides establishments with different options to control contamination in order to produce safe, unadulterated product. The establishments can choose to control Lm strictly through their sanitation practices in their environment. Or in addition to sanitary practices, establishments can control Lm by adding growth inhibitors in their products, or using post-lethality treatments or a combination of growth inhibitors and post-lethality treatments. While all of these methods can produce safe products, FSIS recognizes and adjusts its FSIS verification testing to conduct more verification testing in those establishments that rely strictly on sanitation to control Lm.

Discussion

FSIS recognizes that properly designed and fully implemented food safety systems are fundamental to RBIS. All establishments regardless of size must have properly functioning HACCP systems and FSIS has a role in educating as well as regulating industry to meet this outcome. FSIS is enhancing its outreach efforts, particularly to small and very small plants, to ensure everyone is meeting the same requirements. The Agency is exploring opportunities in this area and anticipates significant outreach activities over the next year.

FSIS recognizes that under our traditional approach to inspection, we have not fully followed the core functions of the public health model – assessment, policy development and assurance. FSIS must collect and assess our data (assessment) to identify and respond (policy development) to situations. In a fully implemented risk-based inspection system, FSIS will also conduct an assurance function to verify whether or not the policy development has corrected what the assessment identified.

FSIS recognizes FSIS verification must be uniform and consistent. This is achieved by providing on-going training and education to all employees. FSIS must also hold itself accountable through the use of management control systems that can be documented and audited.

FSIS recognizes each step taken toward risk-based systems must further protect public health; the Agency will carry out this effort through a transparent process with input from all stakeholders. FSIS will ensure that all establishments meet the same requirements.

Questions for the Sub-Committee—By using the table that has 8 areas of consideration, FSIS is interested in the role of inspection and data as it pertains to RBIS.

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

2. What data would be appropriate in designing and implementing RBIS?
 - a. How should the Agency obtain the data?
 - b. Is the Committee aware if the type of data the establishments or their customers use to identify emerging problems in an operation? How can FSIS get access to this data if it does not presently have it?
 - c. If industry data is used, how does FSIS ensure data quality?

3. How should the Agency define risk for:
 - a. Product
 - b. Process
 - c. Plant

4. Are there any other comments on the Agency's approach to inspection or on the type of data that should be obtained to further enhance a risk-based inspection system approach?

5. If the Agency were to form an on-going working group to look into risk, what recommendations would the Committee have on:
 - a. Who should compose the group? (What is the recommended team of consumer, industry, academia, inspectional organizations?)
 - b. Should the group be a subcommittee of NACMPI?
 - c. What would be the recommended size of such a group?
 - d. How frequently should they meet?
 - e. Where should they meet?
 - f. Who would the recommend Chairperson be? FSIS? Disinterested Third party facilitator?

Contact Persons

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