Measuring Establishment Risk Control for Risk-Based Inspection

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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 species and process
  - Likelihood of hazard
  - Exposure potential
  - Risk control effectiveness

Risk-Based Inspection

- Today's discussion is about risk-based inspection in *both* slaughter/processing and processing-only establishments

- We are *not* today addressing how risk considerations will influence how *slaughter* operations are staffed nor how (someday) processed *egg* products operations might be staffed

Risk Control Components

Important Components of Risk Control

- Food Safety System Implementation
- Food Safety System Design
- Pathogen Control
- In-Commerce Findings
- Enforcement Actions

- Other Components

Food Safety System Implementation

- System implementation consistency
- FSIS documents all regulatory noncompliances– and will continue to do so under RBI
- However, not all NRs are equally indicative of risk control deficiencies
- Our goal is to identify, enumerate, and properly weight public health-related NRs

Food Safety System Design

- Efficacy of the food safety system
- Food Safety Assessment Findings
  - When was the last FSA?
  - What was the outcome?

Pathogen Control

- Pathogen Control in Ready-to Eat Products, Ground Beef, and Other Raw Products
  - *Lm*, *Salmonella*, and *E. coli* O157:H7 RTE testing program results
  - *E. coli* O157:H7 (raw ground beef) testing program results
  - *Salmonella* verification testing program results

In-Commerce Findings

- Adverse Findings In-Commerce
  - Significant Consumer Complaints?
  - Class I or II Recalls?
  - Other Considerations?

Enforcement Actions

- Enforcement Actions
  - Involving Food Safety
  - Not preceded by significant NRs
  - Not initiated as a result of an FSA

Other Considerations

- Other Serious Public Health Concerns
  - *E. coli* O157:H7 Positives Suppliers?
  - AMS school lunch testing results?
  - Others?

Questions for the Committee

- Are these all appropriate objectives for measuring risk control? Should any objectives or corresponding features be deleted? Should any be added?
- Are some components more important—i.e. better indicators of risk control—than others? If yes, should more important components have greater "weight" in our numerical control measure than less important components?
- Should findings from Food Safety Assessments or other sources that indicate exceptionally *effective* risk controls be allowed to *lower* (improve) an establishment's risk control measure?