

**National Advisory Committee on Meat and Poultry Inspection**  
**May 23-24, 2006**

**Sub-Committee Number #1**

**Issue: *Measuring Establishment Risk Control for Risk-Based Inspection***

**1. Are the objectives identified by FSIS all appropriate objectives for measuring risk control?**

The Subcommittee agrees that all of the objectives identified by FSIS as part of a determination of the effectiveness of an establishment's risk-control measures are appropriate. The group does have some additional comments on these objectives:

***Food Safety System Implementation***

- The Subcommittee recommends that FSIS undertake a comprehensive review of its Noncompliance Reporting (NR) system. While the group agreed that NRs may capture some information relevant to the effectiveness of risk-control measures, it also believes that the subjective nature of these reports and their inconsistency may undermine their usefulness.
- As a result of this review, FSIS should consider making some changes to the NR system that would consider only those NRs that relate to food safety and public health in an assessment of the effectiveness of an establishment's risk-control measures.
- In order to measure risk-control effectiveness accurately and fairly, it may be useful to measure and record the level of compliance, as well as non-compliance, of an establishment using a system (like that used in many states) that records whether an establishment is "compliant," "non-complaint," "not observed," or "not applicable."

***Food Safety System Design***

- The Subcommittee agrees that the findings of Food Safety Assessments (FSAs) should be included in an assessment of the effectiveness of an establishment's risk-control measures, but that these findings are not as important as other identified objectives. The group is concerned that the infrequency of FSAs and their inherent subjectivity may limit their usefulness.

***Pathogen Control***

- The Subcommittee agrees that this data is among the most important to be considered in determining the effectiveness of an establishment's risk-control measures. The group urges FSIS to conduct a level of pathogen testing sufficient to obtain a representative sample of establishments, taking into account the type of product, volume of product produced and plant size. FSIS should also ensure that testing is conducted throughout the entire year in order to capture seasonal variations.

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***In-Commerce Findings***

- The Subcommittee agrees that while consumer complaints can be relevant to risk-control measurement, they are not the most important data. The group notes that, of all consumer complaints collected, those related to verified cases of foodborne illness are the most critical to an assessment of the effectiveness of an establishment's risk-control measures.

***Enforcement Actions***

- The Subcommittee acknowledges that FSIS sometimes takes enforcement actions that are not in response to NRs or FSAs, and that these actions could be relevant to an assessment of an establishment's risk-control measures.

**2. Should any objectives or corresponding features be deleted?**

No. The Subcommittee agrees that none of the objectives or corresponding features should be deleted.

**3. Should any be added?**

Yes. The Subcommittee recommends that FSIS consider pathogen test results collected by State and local health departments as part of its assessment of the effectiveness of an establishment's risk-control measures.

**4. Are some components more important – i.e., better indicators of risk control – than others?**

Yes. The Subcommittee agrees that some of the components related to the effectiveness of an establishment's risk-control measures are more important than others. Of particular importance are pathogen test results, especially for Ready-to-Eat (RTE) products.

**5. If yes, should more important components have greater “weight” in FSIS’s numerical control measure than less important components?**

The Subcommittee agrees that some components should be given greater “weight” than others, but Subcommittee members indicated that they are not in a position to advise FSIS on what values to assign to each component. Such a determination can be made only after FSIS has available to it the reliable, consistent data necessary for the accurate assignment of such values, and has a better understanding of how to assess the quality of the data and how to develop a structure to use it.

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**6. 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?**

The Subcommittee agrees that an establishment's exceptionally effective risk controls should be recognized. However, the criteria used to make such a determination should be clear, and oversight of establishments should continue after they have been recognized as exceptionally effective in controlling risk.