

**National Advisory Committee on Meat and Poultry Inspection**  
**October 13, 2006**

**Sub-Committee 2 Report**

**Issue: *Using Risk in Slaughter Operations***

The subcommittee was asked to consider the following questions.

- 1 A. Are there things other than verifying the condition of carcass, pathogens, and process control that the Agency should be accomplishing in a risk-based approach to inspection at slaughter?*
- 1 B. How can risk be factored into the accomplishment of these other purposes?*
- 2. What is the best way for the Agency to deploy its personnel to accomplish purposes of inspection?*
- 3. What comments do you have on the use of this type of approach to guide how FSIS deploys its inspection resources in slaughter operations?*
- 4. What effect should considerations of risk have on what we ask our inspection program personnel to do?*
- 5. What comments do you have on inspection personnel performing these types of tasks at slaughter?*
- 6. What should be the FSIS inspector's response in the event of an emerging problem in reviewing the process?*

**1 A. Are there things other than verifying the condition of carcass, pathogens, and process control that the Agency should be accomplishing in a risk-based approach to inspection at slaughter?**

- FSIS should prioritize food-safety concerns in terms of risk related to human health rather than economic and quality issues.

**1 B. How can risk be factored into the accomplishment of these other purposes?**

- FSIS should prioritize the risks from most important to least important based on human health.

**2. What is the best way for the Agency to deploy its personnel to accomplish purposes of inspection?**

- FSIS should examine risks where they occur and focus attention on the highest risk operations.
- Verification of food-safety system data will require well-educated personnel to interpret the data.
- FSIS must maintain on-line inspection as required to meet the statute.

**3. What comments do you have on the use of this type of approach to guide how FSIS deploys its inspection resources in slaughter operations?**

- FSIS should look more broadly at food-safety management across the entire system.
- Whether plants adopt anti-microbial interventions or other food-safety systems, FSIS should verify the effectiveness of the process.

**4. What effect should considerations of risk have on what we ask our inspection program personnel to do?**

- Product inherent risk is constant for the product.
- Therefore, FSIS should ensure that establishment control of risk is being accomplished and should consider interventions as part of system design.
- FSIS should prioritize inspection personnel activities based on risk to public health by focusing on processes resulting in potential increases or reductions in human pathogens.
- Establishments should optimize processes resulting in potential reductions in human pathogens and manage or control processes resulting in potential increases in human pathogens.
- The Agency should use HACCP principles in assigning inspection duties in the plant.

**5. What comments do you have on inspection personnel performing these types of tasks at slaughter?**

- Ensure records, even electronic records, are being kept locally for use by FSIS personnel in monitoring the process.
- Require at least a minimum level of sampling for microbial pathogens. Verification must be conducted by FSIS.
- If data from industry is utilized, it must be verified by FSIS personnel qualified to make an assessment.

**6. What should be the FSIS inspector's response in the event of an emerging problem in reviewing the process?**

- In the event of a regulatory non-compliance, the Agency should take action.
- In the event that a finding has not yet risen to the level of non-compliance, FSIS should get plant management involved as quickly as possible.