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Docket Clerk
United States Department of Agriculture (USDA)
Food Safety and Inspection Service
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05-031N
05-031N-3
Lloyd R. Hontz

3

[Docket No. 05-031N]; National Advisory Committee on Meat and Poultry Inspection, 70 FR 62091; October 28, 2005. [Risk-Based Inspection]

Dear Sir or Madame:

The Food Products Association (FPA) commends FSIS and USDA officials for placing this important issue on the agenda of the National Advisory Committee on Meat and Poultry Inspection. FPA is a founding participant in the Risk-based Inspection Coalition, which is a broad-based industry coalition, composed of 10 associations whose members represent the vast majority of meat and poultry products produced in the US. The RBI Coalition supports risk-based inspection as a means to enhance food safety.

WASHINGTON, DC

FPA and the coalition believe that it is proper for FSIS to focus the allocation of its inspection resources based upon risk. We believe that raising this issue with the NACMPI is a very positive step toward an open and transparent process that will engage all stakeholders to achieve the ultimate goal of enhanced food safety by properly focusing obviously limited inspection resources as well as industry resources on the most significant food safety issues.

As the committee deliberates on this important issue, we encourage consideration of the following tenets that we believe are critical to the success of the effort.

- Public health protection and enhancement is paramount.
- The process must be open, transparent and all-inclusive
- The availability and sharing of appropriate good data will be important

DUBLIN, CA

A risk based inspection effort needs to focus both on risk-based allocation of sampling and testing efforts, as well as risk-based allocation of inspection resources. The Agency has made significant strides on the former, e.g., risk-based sampling of RTE products. Progress on the later has not been measurable to date.

Measures of success will include:

- Reduction in product recalls for food safety reasons
- Better compliance with food safety requirements along with fewer enforcement actions for **significant** food safety issues
- Reduction in foodborne illness outbreaks (and sporadic cases, to the extent we are able to measure them)

SEATTLE, WA

Risk factors relevant to risk-based allocation of inspection resources include the following:

- **Compliance history of the establishment**
- **Nature of the product**
- **Nature and reliability of food safety controls**

In addition, certain other risk factors could be important for specific establishments. For example production volume can be of significance, but it **must be considered in conjunction with other key risk factors such as the reliability of food safety controls which influence the likelihood of unsafe product being produced and shipped.** In our opinion large volume alone must not preclude a firm from consideration for a lesser level of inspectional oversight. Other considerations, such as seasonal or regional factors may also be significant in certain situations.

In regard to next steps to move this process forward, FPA suggests:

- The first step in the process is to define the key elements of a risk-based inspection program for meat and poultry products. The industry urges FSIS to conduct a public stakeholders meeting no later than first quarter next year to openly discuss the key components necessary for allocation of inspection resources based upon risk. This should be more inclusive than the NACMPI.
- Following a thorough discussion of the desired outcome of the effort, task forces or working groups representative of all stakeholders and with requisite expertise should be assigned to further elucidate the subcomponents of the primary risk factors
- For efficiency and effectiveness, the task forces may need to communicate by conference call and e-mail rather than awaiting opportunities to meet face-to-face

In conclusion, again we commend USDA for starting a process that once successfully implemented will benefit FSIS, industry, and, most importantly, the consumer as it focuses everyone's efforts on the areas with the greatest potential for positive impact on public health.

Respectfully,



Craig W. Henry, PhD
Senior Vice President, Scientific and Regulatory Affairs and Chief Science Officer