

Food Safety and Inspection Service/USDA
Docket No. 05-031N

Comments (Second Set) Submitted by the American Meat Institute for the National Advisory Committee on Meat and Poultry Inspection Fall Meeting, November 15-16, 2005

AMI, Second Set, November 14, 2005

Industry has been inquiring for some time about risk-based inspection (RBI), and offering to assist with the development of protocols associated with RBI without success. The American Meat Institute is pleased that public discussion over RBI is being initiated through the work of the NACMPI.

In other comments submitted on the topic of RBI, specific details on what are and are not appropriate criteria to use to assess risk and build RBI were provided. But there is a broader and higher theme of importance for NACMPI (and ultimately, FSIS) to consider – the role for any Food Safety and Inspection Service (FSIS or the agency) RBI scheme in a greater universe of national food safety assurance. Chained by laws, restrained by unions, constrained by historical paradigms, FSIS may be unable, unwilling or hesitant to examine its role in RBI in a broader context than simply meat, poultry and egg processing inspection. To make a significant contribution toward public health, FSIS should look beyond their own regulatory authority and contrast the risks associated with meat, poultry and egg processing establishments with those found further up and further down the food supply chain, as well as in food products not regulated by FSIS.

FSIS should contribute their resources (personnel and money) to others elsewhere in government, *e.g.*, state and local governments, if risks associated with food production, FDA-regulated food products, foodservice and retail appear to warrant more resources than continued focus on processing establishments, *i.e.*, take a more holistic approach to RBI as part of a nationwide effort, rather than focusing only within their own regulatory arena. This would require FSIS to illustrate their commitment to a national goal rather than a departmental goal, and could require support of modification of the Acts for federal inspection of meat, poultry and egg processing establishments.

The American Meat Institute joins the broader industry coalition in support of the common goals with FSIS to improve food safety and reduce the risks to public health. RBI, when based on criteria that adequately and accurately reflect risks, is a logical step in allocating resources to further improve food safety and decrease public health risks. However, to add significant value to national food safety objectives, FSIS, and its NACMPI, need to develop RBI schemes with national food safety as a focus rather than within the legal and regulatory boundaries associated with the agency. FSIS needs to cooperate with other public health and food safety entities within the United States' government to leverage the national resources to achieve optimal results at the lowest cost. Industry stands ready to do its part in the cooperative effort.