

**From:** Rasekh, Jim  
**Sent:** Thursday, September 07, 2006 3:00 PM  
**To:** Masters, Barbara  
**Cc:** Wright, Sibyl; Dey, Bhabani  
**Subject:** Some Thoughts on Risk Based Inspection

Dear Dr. Masters:

I would like to thank you for conducting the Town Hall Meeting on the subject of Risk based Inspection (RBI) on Wednesday September 6, 2006, and I would like to express some of my thoughts on this subject.

As an old timer employee of the Agency who has witnessed the changes in FSIS inspection program, and how it has grown to a science based agency, I totally support the position of FSIS in introducing the concept of RBI for inspection. RBI has been used for some time in nuclear power generation and petrochemical industry and I am confident that it could be used in the inspection of meat, poultry and egg products.

The ultimate goal of RBI is to develop a cost-effective inspection program that provides a high degree of an acceptable assurance and reliability. RBI can be based on either qualitative or quantitative methodologies used in inspection. Qualitative methods are based on the passed experience and the expert judgment while the quantitative method uses several inspection disciplines similar to HACCP and it sets priorities to develop program for inspection.

The most advantages of the RBI are; to ensure risk of hazard is reduced to its lowest practical level, optimize the inspection schedule, focus efforts onto the most high risk plants, and to use the most appropriate approach to inspection. The performance of the past is the reasonable assumption as indicative of the future.

From the questions asked from the audiences at the Town Hall meeting, it seems that there was a lack of understanding on the advantages of RBI. Perhaps the Agency needs to develop a workshop on the understanding the concept and the advantages of RBI and how it relates to HACCP. This to a great deal might clear the issues and misunderstanding on this important initiative.

Best Wishes

Jim

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