

From: Amoureux, Ramon
Sent: Tuesday, October 10, 2006 9:07 AM
To: Risk Based Inspection
Subject: Inspection coverage

When the implementation of Risk Based Inspection is conducted, some establishments will receive increased time or visits by inspection personal and some will receive less. How will the time or number of visits be determined will it be by the number of NRs that have been issued and the products that the firm produces? Will the Food Safety Assessments that have been conducted by the Enforcement Investigation Analysis Officers be considered along with the enforcement actions that have been taken against a establishment or the lack of? Some of the establishments would need to have increased inspection or more time spent in the facility and the NRs do not reflect the true condition of the establishment due to inspection personal (CSIs, FLSs and PHVs) not performing their duties as required.

Suggestion that FLS and EIAOs several months before the implementation of RBI visit all establishments and submit a report of the conditions of the establishment, but not conduct a full FSA.