

Current Thinking: Use of 3rd Party Data in RBI

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Data from Other Sources
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Goals for Use of Data

- Appropriately inform risk management:
 - Data directly collected by FSIS
 - Data acquired by FSIS from non-FSIS sources
- Demonstrate desired, measurable impact on public health protection through safe food

Prior Use of Non-FSIS Data

- **Risk assessment**

- *Listeria monocytogenes* (68 FR 8737, February 25, 2003)
 - Ratio of *Listeria spp.* to *Listeria monocytogenes* (blinded industry data via Cornell University)

- **Economic impact analysis**

- Specified risk material (69 FR 18245, April 7, 2004)
 - Analysis of regulatory options (Sparks Companies, Inc., via American Meat Institute)

- **Pathogen testing results**

- Third party laboratory (former FSIS Notice 54-05)
 - State laboratory meeting specific methodology criteria

Use in RBI

- “Crediting”
 - Supplement FSIS findings with establishment-specific data
 - Electronic web-based Form 10,240-1 and associated production practices – risk control/inherent risk factored into monthly scheduling
 - Adjust inspection activity (observation, records review, testing) to increase/decrease -- not exempt

Issue

- Reliability
 - Conagra Recall associated with *Escherichia coli* O157:H7*
 - FSIS Directive 10,010.1 (February 1, 1998) – “generally exempted” from testing by FSIS due to documentation in HACCP plan of:
 - Validation of pathogen reduction intervention
 - Testing for the pathogen
 - Preventing use of outside sources

* OIG, #24601-2-KC, September 2003

Solutions

- Focused FSIS verification
 - Food safety assessments
 - Checklist score related to validation of *Listeria monocytogenes* controls
 - Criteria to rank reliability of data
 - Sample collection design (surface/sub-surface)
 - Statistical basis of sampling
 - Laboratory method sensitivity/specificity
- Standardized 3rd party audit result

Summary

- Make appropriate use of reliable industry and non-FSIS data to supplement FSIS data
- Identify safeguards to ensure on-going reliability of all data

End

- Thank you

Thank You