

**National Advisory Committee on Meat and Poultry Inspection
August 8-9, 2007**

**Pilot Project to Explore Mechanisms for
Sharing Industry Data with FSIS**

Purpose

FSIS is seeking the Committee's recommendation on mechanisms for sharing industry (FSIS-regulated meat, poultry, and processed egg products) data with FSIS. The agency is considering establishing a pilot project to collect facility-specific industry data, which could be used to inform FSIS policy development, specifically the possible use of industry-supplied data in the allocation of inspection resources. As FSIS looks towards the future of risk-based inspection, it will want to continually enhance its data inputs. Data collected by establishments and other sources, if available to the Agency, could provide more information on which to base inspection decisions. FSIS is seeking further guidance from the National Advisory Committee on Meat and Poultry Inspection (NACMPI) on the possible use of industry data, including issues of concern related to data sharing mechanisms, assuring data quality, and the development of a pilot data sharing project.

Background

FSIS recognizes that sound data is essential to support the agency's actions aimed at protecting the food supply and achieving its public health mission. Consequently, it is the intention of FSIS to more fully use non-FSIS data to supplement FSIS data in informing effective risk management strategies. The process by which these data are used should be as transparent to stakeholders as practical and feasible as possible.

FSIS has used non-FSIS data in a variety of ways in the past, such as through risk assessments and economic impact analyses, to develop regulations and for risk-based verification testing programs. Thus far, most of the data submitted by establishments and used by FSIS have been aggregate data; not specific to individual establishments, with the exception of production information required to be submitted to FSIS under the *Listeria monocytogenes* program by establishments producing post-lethality exposed ready-to-eat (RTE) products. As FSIS develops risk-based inspection, validated aggregate data will continue to be useful in assessing broad, nationwide risk management impacts. However, a primary focus of risk-based activity relates to the degree of process control exhibited by individual establishments and then incorporating that degree of control into allocation of an appropriate level of inspection by FSIS in that establishment.

Inspection, in this case, relates both to time and attention by FSIS inspection program personnel in verifying food safety through observation of the production process or by a review of records, and to the collection of meat, poultry, and processed egg product samples for laboratory analysis.

FSIS is concerned about relying on non-FSIS generated data unless it has been verified. Thus, in formulating how best to use non-FSIS data in Agency decision making, mechanisms need to be identified and implemented to assure that these non-FSIS data are reliable and that they remain reliable over time.

Discussion

In November 2003, the NACMPI recommended that FSIS provide information on how it would like to receive data that is voluntary from reliable sources, including industry. Emerging from the group's discussions were issues associated with data sharing, such as the mechanism of submission, data quality, and protection of confidential data. NACMPI suggested that ground rules be established for submission, acceptance, and use of voluntarily submitted data. To that end, FSIS suggests establishing a Subcommittee to propose criteria for submitting, reviewing, accepting, and protecting second party data submitted by industry to a third-party repository or directly to FSIS via the Internet. Use of a third party auditor could be considered in supplementing FSIS verification of the quality of the data.

Questions for the Sub-Committee

In the context of establishing a pilot program to collect establishment-specific industry data for possible use in allocating inspection resources, FSIS requests that the Sub-Committee consider the following questions:

1. What type of industry data would be appropriate for use in a risk-based inspection (RBI) algorithm for use in processing establishments? For example:
 - a. Presence/absence, enumeration, serotype/subtype data for pathogens in products?
 - b. Plant environmental monitoring data, including presence/absence, enumeration, serotype/subtype data for pathogens?
 - c. Volume data?
 - d. Other data?

Please provide rationale as to why various types of data would be appropriate and beneficial for use in RBI.

2. What type of industry data would be appropriate for use in a public health-based inspection algorithm for use in slaughter establishments? For example:
 - a. Presence/absence, enumeration, serotype/subtype data for pathogens in products?
 - b. Plant environmental monitoring data, including presence/absence, enumeration, serotype/subtype data for pathogens?
 - c. Volume data?
 - d. Other data?

Please provide rationale as to why various types of data would be appropriate and beneficial for use in public-health based inspection.

3. How should the Agency obtain the data (i.e., mechanism of collection)?
 - a. Direct from industry to FSIS databases via the Internet (with secured identity)?
 - b. Contract laboratory data?
 - c. Collection as part of inspection activity by FSIS inspectors of industry records/information?

Please provide rationale for any recommended mechanisms of data collection.

4. If industry data are used, how does FSIS ensure data quality (e.g., verification by FSIS inspectors, use of standardized methods and laboratory certification, use of third-party audits, etc.)?

Please provide rationale as to why various methods would/could ensure data quality.

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