

National Advisory Committee on Meat and Poultry Inspection

Measuring Establishment Risk Control for Risk-based Inspection

Purpose

Even though some types of meat and poultry products pose greater health risks than others, and some establishments control risks better than other establishments, FSIS essentially conducts processing inspection as though all establishments pose the same level of public health risk. Under the current system of processing inspection, a Consumer Safety Inspector visits every plant at least once every shift to perform a variety of verification procedures scheduled by PBIS- the Performance Based Inspection System. PBIS essentially schedules inspection procedures the same way in all processing plants, regardless of the particular food safety hazard associated with one plant versus another or the potential risk to the public one plant or process may pose versus another.

As the Agency stated to this Committee in November 2005, the objective of implementing a more robust Risk-Based Inspection System (RBIS) is to improve public health by placing greater inspection and verification emphasis on federally-inspected meat and poultry establishments that pose greater risks. In a more robust RBIS, each establishment's risk could be categorized, and the type and intensity of inspection conducted in the establishment could be based primarily on that risk. Establishment risk could be characterized by considering the hazards *inherent* in the establishment's operations (e.g., species, processes, exposure, and other factors), the measured effectiveness of their risk *control* systems, and other relevant factors known to inspection personnel and Agency managers.

FSIS is today seeking guidance from the Committee specifically on how the Agency can most meaningfully measure *how well meat and poultry processing establishments¹ control the risks in their operations*.

Discussion

FSIS has identified what we believe are several important dimensions of effective risk control in processing establishments and is formulating ideas about the corresponding components of a meaningful yet practical measure of establishment risk control. Our preliminary ideas about *what* we want to measure, and *how* we might measure it, are identified in the table that follows.

¹ Risk control measures would apply to all federally-inspected meat and poultry processing operations whether in "processing-only" establishments or in "combination" slaughter/processing establishments. The system discussed here will *not* influence how slaughter operations are staffed. In addition, this system will not influence how processed egg products operations are staffed since such operations are not yet operating under PBIS or HACCP and Sanitation SOP regulations (9 CFR 416 and 417).

<u>Risk Control Measurement Objectives</u>	<u>Components of Risk Control Measure</u>
Food Safety System Implementation	Consider only Significant ² FS NRs
Food Safety System Design	Incorporate Food Safety Assessment Findings
RTE and <i>E. coli</i> O157:H7 Pathogen Control	Integrate Results of Agency testing programs
<i>Salmonella</i> control in raw products	Reflect Consistent, Variable, or Poor Control
Findings in Commerce	Consider Consumer Complaints, Recalls, and other Findings in Commerce
Other Enforcement Actions ³	Gauge Implications of other Regulatory Actions Taken Against Establishments
Other Components	Incorporate Other Risk Control Information such as STEPS ⁴ , company testing results, and AMS school lunch testing results

Questions for the Committee

Are these all appropriate objectives for measuring risk control? Should any objectives or corresponding features be deleted? Should any be added?

Are some components more important—i.e. better indicators of risk control—than others? If yes, should more important components have greater “weight” in our numerical control measure than less important components?

Should findings from Food Safety Assessments or other sources that indicate exceptionally *effective* risk controls be allowed to *lower* (improve) an establishment’s risk control measure?

Contact Persons

Philip Derfler, Assistant Administrator
Office of Policy, Program and Employee
Development
Phone: 202-720-2709
Email: Philip.Derfler@fsis.usda.gov

Don Anderson
Office of Program Evaluation,
Enforcement and Review
Phone: 202-720-2417
Email: Don.Anderson@fsis.usda.gov

² The Agency is considering how to define and include in the calculation food safety non-compliances considered significant. These may include NRs citing non-compliance with the requirements of 416.15 or 417.3, those issued because of adulterated or contaminated product, those for which a regulatory control action was taken, those issued for inadequate validation or inadequate verification, those issued for non-compliance with the Sanitation Performance Standards regulations, and possibly others.

³ Prior enforcement actions resulting from causes not captured by other components.

⁴ System Tracking *E. coli* O157:H7 Positives Suppliers database