

*National Advisory Committee on Meat and Poultry Inspection Meeting
August 27-28, 2008*

Report of Sub-Committee Number 1

Chair: Mr. Michael Kowalcyk

1. What recommendations does the committee have regarding the FSIS triad of protections (equivalence, audits, re-inspection) of protection for imported meat, poultry and egg products?

a. Should each element of the triad be retained or some elements dropped? If dropped, identify the elements.

All elements should be retained although some modifications should be considered based on risk and historical country compliance.

b. Should other elements be added? If added, identify the elements.

- There should be collaboration with CODEX concerning the new work in CCFICS on guidance concerning onsite audits. The committee should be provided with the draft guidance on on-site audits resulting from the CCFICS workshop in July in Brussels. The NACMPI Committee should also be provided with the CODEX document “Law on Food Safety and Our Reference Point.”
- EIAO methodologies used in domestic programs are an example of a defined methodology to assess a food safety system. This approach may be a good approach to further define and implement in imported product.

Equivalency

- Initial equivalency should include a formal risk evaluation of the products or product category and the process in order to help determine initial equivalence of the countries food safety system.
- Risk evaluation should be added for product and country.
- Information collected in a consistent manner and able to be cross-referenced.
- Training foreign country in the USDA systems needs to be strengthened to ensure equivalency.

Audit

- Historically has there been times when countries have been suspended – Agency needs to be more proactive in their audit process with respect to risk.

- Length of time between audits can be based more on risk and compliance history in the foreign country.
- USDA audits need to report on elements passed as well as elements failed to ensure that the audit is adequately assessing the program.

Re-inspection

- Directed to high risk product and high risk imports.
- FSIS needs to develop a protocol for enforcing compliance. Ensure we have proper enforcement authority.
- Open communication with all involved in the import process.

2. For each of the three elements of the triad of protection for imported meat, poultry and egg products, sub-elements have been identified. What recommendations does the committee have regarding the sub-elements?

a. Should each sub-element be retained or some sub-elements dropped? If dropped, identify the elements.

Each sub-element should be retained; however the sub-committee recommends additional review of each sub-element within the triad.

Equivalency

- Initial equivalence is critical in determining a baseline for the trading country.
- On-going equivalence would be re-evaluated based on changes within the importing countries processes/historical compliance or FSIS audits and inspection outcomes.
- Regular documentation should include how equivalence is monitored and enforced. The Agency should review the process and develop guidelines concerning on-going monitoring procedures used to ensure conformity with the initial equivalence document and when the judgment of an equivalency measure may be suspended.
- On-going equivalence measures should address historical compliance.
- A procedure for translating equivalency documents needs to be looked at in order to improve the process.

Audit

- Historical evaluation of trading country audit outcomes is important.
- Needs to be strengthened – While audits should continue, on-going audits should be based on risk for all equivalency programs – timing should be based on risk and elements of the audit process should be based on risk.

Re-inspection

Key question: Are we adequately using our resources to do routine re-inspection? Many products are going to further processing with HACCP plans. Re-inspection should focus on “for cause” and “directed.” We should look at the system to reduce redundancy and focus on food safety rather than non food safety elements such as counting boxes.

- Thoroughly evaluate current re-inspection process and correlate activities among all involved agencies (APHIS, CBP, FSIS, etc.).
- Identify steps within the current routine re-inspection process that need to be retained by FSIS.
- Random re-inspection need to continue at port of entry in order to understand ongoing risk and emerging trends.
- Expanding electronic certification system would help to give the Agency lead time to determine whether re-inspection is necessary or not, and we will be able to share data.
- Data collection and management processes/capacities need to be evaluated. There should be an agreement among participating agencies as to who would own and manage the information. Resources need to be allocated to properly use and analyze the data.
- Employ statistically sound sampling procedures at ports of entry.
- Re-inspection should focus on “For Cause” and “Directed” activities relating to public health.

b. Should other sub-elements be added? If added, identify the elements.

See Above