

National Advisory Committee on Meat and Poultry Inspection

January 13-14, 2015

Washington, DC

Subcommittee: FSIS' Evaluation and Management of Chemical Hazards within the National Residue Program Charge

Report and Recommendations

Question 1: FSIS would like NACMPI to provide feedback on how FSIS is managing chemical hazards within the NRP.

- a) **If the committee agrees with FSIS' approach, why?**
- b) **If the committee disagrees, what are their recommendations for improvement?**

The National Advisory Committee on Meat and Poultry Inspection (Committee) supports the National Residue Program (NRP) as it provides critical surveillance and information regarding chemical hazards in the meat and poultry supply. The NRP should continue to be managed and be provided the necessary resources to achieve its mission. The Committee recommends the following to improve the management and effectiveness of the NRP.

- The Committee recommends the Food Safety and Inspection Service (FSIS) develop a strategy to more effectively communicate the NRP, its mission, and the data it collects to its stakeholders, which would include, but not limited to, industry personnel, trading partners, laypersons, technical experts, among other stakeholders.
- The Committee recommends USDA develop a "Working Group". This Working Group would include intra- and inter-agencies personnel and experts, but not limited to, other agencies that regulate and collect data regarding chemical hazards (*i.e.* FDA, APHIS, EPA, CDC/ATSDR, FAS, state and international [FAO, WHO, *etc.*] partners).
- The Committee recommends the Working Group develop the following:
 - Communication strategies providing information on the role and responsibilities of each agency, and the expectations for the regulated industries, including requirements or guidelines for traceability when violative residues are identified.
 - An internal process to determine if new chemical hazards exist and should be monitored, if new detection methods need to be developed, as well as, if chemical hazards should be removed from the program when the risk is *de minimis*. The Committee recommends for known chemical hazards the process should include long-term exposure and be based on public health risk. Insights from stakeholders should be solicited and reviewed.

- The Committee recommends that FSIS continues to provide stakeholders with quarterly and yearly reports and does so in a timely fashion. The Committee recommends the reports should include a more detailed analysis of data including additional information on non-violative residues.
- The Committee recommends FSIS determine if additional and comparable data exists among State residue program. When possible, FSIS should incorporate the State residue data to complement NRP analysis.
- The Committee recommends FSIS evaluate if more data is available or should be collected in small establishments (domestic and international) within NRP, as well as, State residue programs.
- The Committee commends FSIS for recent advancements in chemical detection methods. The Committee recommends that FSIS to continue to provide resources to improve technologies within the NRP, including the appropriate staffing needed to achieve the mission of the NRP.
- The Committee encourages FSIS to develop more rapid screening and confirmation methods in order for results to be reported in a timelier manner to industry.

Question 2: Does the committee agree with how FSIS allocates samples across the current NRP sampling structure?

a) Is FSIS allocating the right proportion of samples for the domestic vs the import program?

The Committee believes FSIS is sampling appropriately the domestic and international meat and poultry supply in their surveillance program. The Committee believes the volume-weighted process of selecting samples in the domestic surveillance program is appropriate. The Committee recognizes the importance of the NRP in maintaining the import and export of meat and poultry products within the United States. The Committee encourages FSIS to confirm communication among NRP staff and International Program staff exists to ensure proper surveillance of the imported meat, and poultry supply is ongoing, while maintaining the necessary equivalence status with trading partners. The Committee recognizes a stratified sampling program may be needed to retain equivalence with trading partners.

b) Is FSIS allocating the right proportion of samples across the domestic program – scheduled vs inspector-generated program?

The Committee believes the sampling allocation among the surveillance program (domestic and international) and the inspector generated is appropriate. The Committee recommends FSIS review inspector training and conduct periodic reviews across districts to ensure adequate and consistent implementation of each program, particularly among

inspectors for small and very small establishments. The Committee recommends this review include sampling frequency and sample results. The Committee encourages FSIS to analyze surveillance data and inspector-generated data, including determining if correlations exist, to ensure appropriateness of sampling plan, as well as, inspector training.

c) Is FSIS allocating samples across slaughter classes effectively?

The Committee believes FSIS is appropriately allocating samples across all slaughter classes effectively for surveillance program. The Committee recommends FSIS ensure the scheduled sampling program is a random and the most effective representation of the population it is measuring.

Question 3: Does the committee agree with FSIS' emphasis on known (vs unknown) chemical hazards?

The Committee agrees with FSIS's emphasis on known chemical hazards and encourages FSIS to continue to focus on the known hazards. The Committee recommends FSIS utilizes the Working Group (as described above) to develop a process for reviewing the type and level of hazards, identifying new hazards and reviewing if hazards no longer exist. The Committee recommends this review of chemical hazards occur on a periodic basis and FSIS provide the opportunity for stakeholder input. The Committee believes this process will provide the needed information on existing and emerging chemical hazards across departments for an overall improved process to ensure public health is maintained.

Question 4: How should FSIS consider chemical categories – equally or ranked relative to each other?

The Committee recommends FSIS consider chemical hazard categories based on relative risk and be public health based. The Committee recognizes the import surveillance program will need to consider that chemical hazards may differ among the U.S. and its international trading partners. The Committee recommends FSIS may need to allocate additional resources to ensure hazards from chemicals not approved within the U.S. are identified and public health is maintained. The Committee recommends the abovementioned Working Group be convened to identify these issues.