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PROCESSING TIP . . .

USDA-FOOD SAFETY INSPECTION SERVICE IS MOVING TO RISK-BASED INSPECTION

The USDA-FSIS has recently announced that they would be using a different approach to inspection. Currently, plants are provided inspectors based on the needs of the individual plant with regard to the number of birds slaughtered. However, with the current system in place, the FSIS is utilizing information being collected by inspection personnel at the plants to determine which plants are operating under “low risk” or “high risk” scenarios. The FSIS stated that, “by taking into account the relative risk of what each processing plant produces and how each plant is controlling risk in its operations, FSIS will more effectively allocate inspection resources to those processing plants needing it the most, while continuing daily inspection at all processing facilities. The level of inspection at a processing plant will be based on a number of objective factors such as public health related inspection noncompliances and FSIS microbiological testing results and will be updated each month so that inspection resources can be adjusted as conditions change. This enhanced inspection system will be more proactive in terms of preventing human illness and will yield greater confidence that meat, poultry and egg products are safe.” The USDA-FSIS deserves kudos for this new approach, as it is a more reasonable approach to balancing the limited resources within the USDA. The current approach is flawed in the same way that putting 100 police officers into an area of a city with low crime and 100 officers into an area of a city with high crime and expecting crime to drop in those two areas the same amount is flawed. It makes much more sense to place the officers where the problems are occurring and use the resources wisely. However, there is a major flaw in the analogy used above and the following pitfalls that may not have been considered:

1. Bacteria do not respond to laws. They are very resilient to laws and law enforcers. Interestingly, some areas of the country are particularly “hot” with *Salmonella* and other areas are not. This begs the question, is it fair to penalize plants that happen to be in these areas and suffer unjustly with chronically high *Salmonella* prevalence? No amount of additional inspection personnel is going to change this. The new inspectors may force the plants to optimize their

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process to the point of eliminating as much *Salmonella* as possible, but the plant may be under unfair increased pressure and scrutiny due to the new approach.

2. One of the factors that may put a plant into a “high risk” category is the presence of specific serotypes of *Salmonella* linked to food-borne illness in humans. This is particularly discriminatory to certain plants. Some processors, simply by their choice of location within the country, will consistently find more dangerous serotypes of *Salmonella* than other processors in other parts of the country. Is it really fair to penalize them because they chose the wrong location? No new inspection personnel and no intervention strategy that I am aware of will be able to shift the serotypes of *Salmonella* from “high risk” to “low risk”.

3. According to the latest figures found at, http://www.fsis.usda.gov/Science/Progress_Report_Salmonella_Testing_Tables/index.asp#FigureA1, the FSIS reported that 11.4% of the processing plants in the U.S. are failing the *Salmonella* performance standard. This number is likely to skyrocket as more emphasis is placed on “high risk” plants. Likewise, more emphasis means a much higher frequency of testing. Unfortunately, this may result in a much greater frequency of failure because the likelihood of an inspector conducting a *Salmonella* testing series during an upswing in *Salmonella* due to weather or seasonal shifts is much more likely to occur.

It will be interesting to see how the new regulations will impact the industry.



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“Your local County Extension Agent is a source of more information on this subject.”

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