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TAPR II
TECHNICAL ASSISTANCE FOR POLICY REFORM

Global Issues in Food Safety Inspection and Recommendations for the FSA

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The Goals of a Food Inspection System-

- "It's the duty of industry to provide safe food, it's the duty of government to ensure that it happens."
  - *Professor Michael Doyle, University of Georgia*

Bright Future for the FSAE

- Teamwork, leadership and well executed strategic plans will create a dynamic public health workforce that will benefit all Egyptians
- Egypt will set the standard for excellence in food safety in the region
- Public health agencies around the world will look to Egypt as the model for science-based and progressive food safety protection

The Goals of a Food Inspection System-Regulatory Compliance

- Reaching the goal of regulatory compliance requires
  - Science-based laws and rules
  - Education for operators
  - Knowledgeable, highly skilled and reliable staff
  - Consistency in administration
  - Measuring effectiveness and improving performance
  - Wining the confidence of all stakeholders

Strategic planning: 1 Create a science advisory council 2.Establish training programs for food facility operators 3. Attract and retain the most qualified workforce possible 4.Establish measurable goals for the agency 5. Effectively communicate the mission of the FSA to all stakeholders

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The Goals of a Food Inspection System-Consumer Protection

- Reaching the goal of consumer protection requires
  - That food be safe according to its intended use
  - Education and mobilization of consumers
  - Transparency for consumers
  - Effective and timely interventions

Strategic planning: 6 Establish the acceptable standards for chemical, physical and microbial qualities of foods at all stages of the food supply 7. Make consumers participants through effective social marketing and food safety education 8. Use the media to effectively communicate the right food safety information to consumers 9.Use technology to ensure that foods can be traced back to suppliers and producers and tracked forward to consumers 10. Give the FSA recall power

The Goals of a Food Inspection System-Enhancing Trade

- Reaching the goal of enhancing trade requires
  - A fair and valid basis for the selection of trading partners
  - Transparency for trading partners
  - Timely and accurate communication
  - Maintaining the confidence of the international regulatory community and food industry

Strategic planning: 11 Establish the acceptable standards for chemical, physical and microbial qualities of foods imported into the country and exported 12. Establish a sampling and monitoring system that ensures imports and exports meet standards 13. Establish effective communication systems to inform all trading partners of standards and problems in the food supply 14. Interact and participate with the international regulatory community in setting of Egyptian standards

The Goals of a Food Inspection System-Continuous Improvement

- Reaching the goal of continuous improvement requires
  - Continuous assessment
  - Accurate and timely information transfer
  - Analyses of data
  - Action
  - Feedback

Strategic planning: 15 Establish the hey performance criteria for the FSA 16. Develop or purchase the technology needed to collect and assess key agency performance criteria. 17 Modify the agencies' approach to its activities and determine that the changes are working

Inspection Inputs-Science

- Science input may come from
  - Foodborne illness risk assessments
  - Peer reviewed research in food science and related fields
  - Accepted science-based codes of practice
  - Input from scientists, industry and academia

Strategic planning: 18 Conduct an Egyptian specific food safety risk assessment following established guidelines 19. Identify the science that the FSA will rely on to support its inspection criteria. 20 Identify key research in food safety and create relationships with researchers and scientists

Inspection Inputs-Inspectors

- To control the inspector input requires
  - Qualified personnel
  - Measurable goal setting
  - Adequate supervision
  - Objective performance appraisal
  - Frequent training and calibration
  - Frequent communication
  - Human Resource Management

Strategic planning: 21 Identify a pool of qualified applicants and recruit and retain the necessary talent to staff the FSA 22. Establish the educational content, methods of delivery and frequencies required for ongoing training of staff 23. Clearly communicate desired staff competencies and establish the methods for performance reviews. 24. Create the human resource management functions needed to manage the staffing needs of FSA

Inspection Inputs-Inspector Bias

- To control inspector bias requires
  - Guidance documents
  - Adequate supervision
  - Training
  - Effective inspection data capture technology

Strategic planning: 25 Create and effectively communicate guidance documents and SOP for each inspection task 26. Establish an effective span of control for mangers and supervisors 27. Clearly communicate the desired qualities of inspection data. 28. Develop, implement and manage inspection technology including hand held devices, databases and reporting functions

Inspection Inputs-Confounders

- Other confounders can also enter the inspection process and affect the outcome, including
  - Pressure on inspectors from operators
  - Political pressure on inspectors
  - Role stress
  - Time pressure
  - Work-overload

Strategic planning: 29 Create efficient territories and workloads for inspectors 30. Establish a civil service system to ensure the inspector is protected from undue political influence 31. Clearly define the roles of the inspector

Inspection Inputs-IT

- To control the IT input,
  - Select the right IT
  - Configure the IT properly
  - Train inspectors in the use of IT
  - Manage the IT

Strategic planning: 32 Identify the best technology in use today to manage inspection data 33. Establish training programs for use of technology 34. Adapt technology to address the unique attributes of the Egyptian food safety inspection model

Inspection Inputs-Tools

- Inspection tools, to control this input,
  - Select the right tools
  - Train the inspector in the use of the tool
  - Maintain the tools

Strategic planning: 35 Identify the best tools in use today to evaluate the safety of foods and the environment 36. Establish training programs for use of tools 37. Establish a preventive maintenance program for tools and control abuse.

Inspection Process-Goals

- Goals of the inspection process
  - An accurate measure of compliance
  - Impartiality
  - Fairness
  - Cultural sensitivity
  - Provide a measurable public health benefit to the consumer
  - Provide a measurable economic benefit to the operator

Strategic planning: 38 Determine the measures to use to determine if consumers are benefiting from the FSA initiatives 39. determine the measures to use to determine if operators are benefiting economically from FSA activities.

Inspection Process-Standards

- Standards must be
  - Current and scientific
  - Applicable to the operation under inspection
  - Practical for the operator to apply
  - Measurable
  - Effectively communicated

Strategic planning: 40 Apply the current science and best practices in use by the international regulatory community and industry 41. Ensure standards are scientific to the extent possible.

Inspection Process-Determining Compliance

- Determining compliance includes recognizing
  - Major vs. minor situations
  - Critical vs. non-critical situations
  - Non-compliance vs. substantial compliance vs. total compliance
  - Ongoing vs. intermittent violations vs. one time events
  - Immediate threats to public health

Strategic planning: 42 Provide manuals and guidance documents the define for inspectors a multitude of commonly found hazardous situations in food operations and their corresponding risk

Inspection Process-Determining Compliance

- Determining compliance requires
  - Access to the entire operation
  - Sufficient time
  - Thoroughness
  - Focused observation

Inspection Outputs-Inspection Report Data

- Characteristics of useful inspection report data
  - Accurate
  - Clear
  - Code specific
  - Objective
  - Legally defensible

Strategic planning: 43 Create meaningful and clearly written operation specific inspection forms

Inspection Output-Public Health Interventions

- Interventions to improve compliance and protect public health include
  - Education and training of operators
  - Ensuring corrective actions are taken
  - Embargo, detainment and destruction of unsafe food
  - Re-inspections
  - Immediate closure
  - Fines
  - Probation or revocation of license

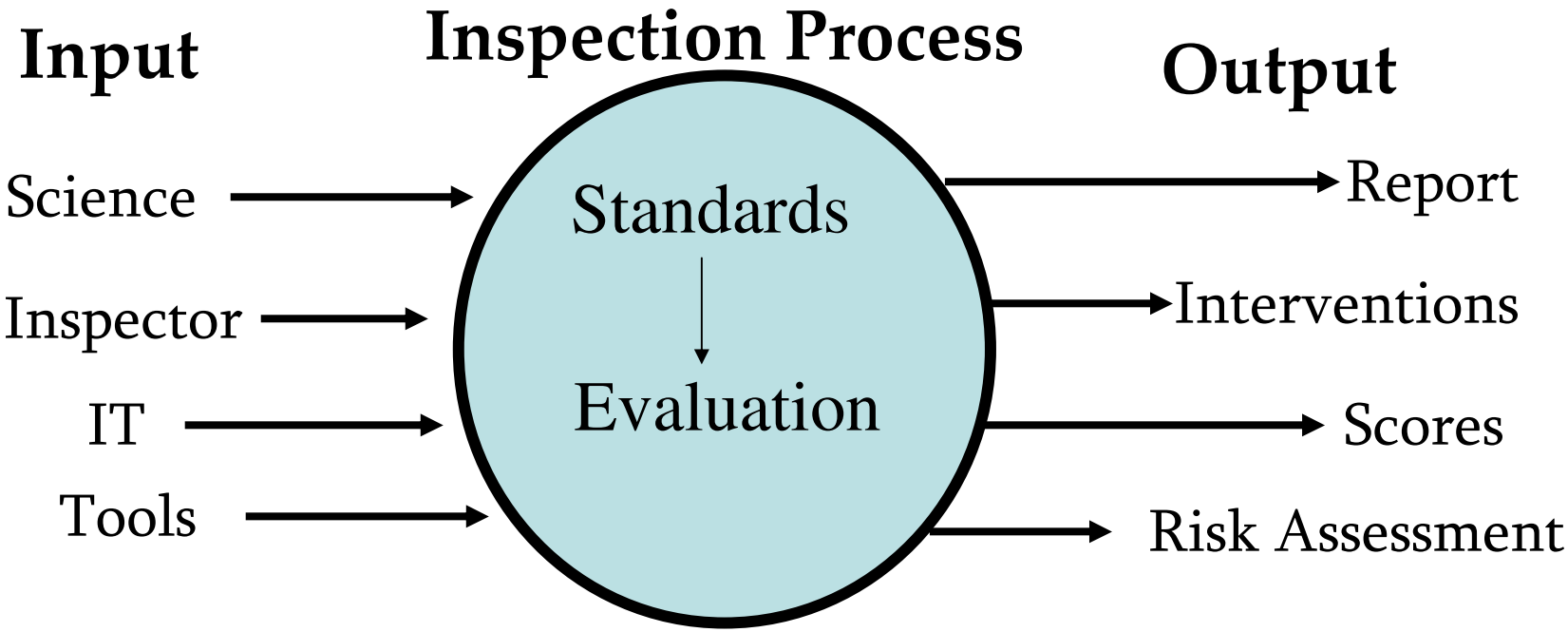
Strategic planning: 43 Establish the content of operator food safety education and training. 44. Create a separate educational arm of the FSA without enforcement duties. 45. Establish the criteria for dealing with various levels of risk found during inspection 46.Define the legal enforcement powers of FSA 47. Define the penalties for various levels of code infractions

Inspection Output-Scores

- Compliance scores, if used must be
  - Meaningful to the operator and the public
  - Predictive of future compliance
  - Made public

Strategic planning: 48 Create a scoring system for violations based on the operational risks. 49. Require operators to cooperate with regulations by monitoring their own food safety efforts and merge that into a risk assessment to base a score. 50 Require public postings of food establishment scores

Food Safety Inspection System Model



Inspections of Food Safety Systems-Active Managerial Control

- Active Managerial Control (AMC) requires that
  - The operator understands food safety hazard control
  - The operator systematically controls risk factors
  - The operator's control procedures are verified through document review, or less formally (questions and answers)

Inspections of Food Safety Systems-Audits

- Contrasting inspections with audits
  - Inspections are a “snapshot” of compliance with codes
  - Audits study the effectiveness of food safety systems as well as verify code compliance
  - Self-inspection/audit programs strengthen external inspection
  - Sampling occurring within the scope of an audit strengthens the validity of findings

Inspections of Food Safety Systems-Risk Assessment (output)

- How inspection measures risk
  - Inspections measure risk by measuring compliance with codes
  - Compliance is based on conditions found at the time of inspection
  - Inspections tend to provide a subjective measure of risk

Inspections of Food Safety Systems-Risk Assessment (output)

- How audits measure risk
  - Audits measure risk by measuring the *strength of the operator's controls* in light of code compliance
  - Audits require a records review *and* a visual inspection
  - Audits determine risk based on documented operational strengths and weaknesses, *and* inspection findings, and are more objective

Strength, Vulnerability and Threats to the FSAE

- Scientific validity
  - Science strengthens the integrity of the food safety inspection system against threats
  - Vulnerability increases if the science is faulty, misinterpreted or not applied

Strength, Vulnerability and Threats to the FSAE

- Transparency and communication
  - Transparency strengthens the food safety inspection system by increasing stakeholder confidence
  - Vulnerability increases if progress toward meeting objectives is not communicated effectively to stakeholders

Strength, Vulnerability and Threats to the FSAE

- Key threats
  - Actual, or perceived failure to meet goals and objectives
  - Economic, political or social pressure
  - Unreasonable stakeholder expectations
  - Unmet stakeholder expectations

Film

- An example of PDA documentation, database management and reporting