

## Breakout Group 5B

Question 1) Was our explanation of the risk-ranking method understood? How can we improve its clarity?

- More no than yes.
- Yes, it is clear.
- Who are the risk managers?
- What do they need or looking for?
- Who would it include?

Scoring

- How do you do this without data?
- Bottom up approach
  - Some concerns
- Absence of data
  - Need to do research rather than “expert” opinion
- Consider consumer confidence (not science)
  - Feed may not be a control point
  - Need to look at other factors

Question 2) Do you agree with the risk-ranking method?

Question 3) Do you agree with how we plan to use the risk-ranking method?

**Ranking method and Question #3 tied together.**

- no data
- from top down no data
- Industry - no; more scientific data is needed
- Each ingredient pair- sampling is expensive
- Evaluate thru a process (HACCP) on reality
- Will variables (other) be considered in the risk ranking? Ex. Transportation, Environment
- Hazards that were brought up, are they really a risk?
- Absent data doesn't mean there is a problem
- Includes both animals and human risks
- Looking for other methods on how to evaluate risks
- Establish ground rules
- Research vs. experts
- How does the consumer separate out the risk by specie, contaminant?
- No alternate methods are suggested at this time.
- Top to bottom would be preferred rather than bottom up as long as there is significant data to assess the risk.
- Broad based research
  - Comp data set.
- Need better communication between industry and FDA.
- Focus on what industry is doing or where they are spending resources.
- List ranking is just an approach.

Question 4) Are there methods other than risk-ranking that should be considered for prioritizing which hazards should be addressed?

- Focus on current program and identify weakness. What are advantages and disadvantages?
- Test pilot one ingredient pair risk (Ex: 1% not doing what they are doing)
- Assign High or Low to risks
- No numbering ranking
- Breakdown the comprehensive by segments on risks.
- AFSS - survey industry on programs that are ready out there.
- Third party audits

Question 4B) What are the alternative methods and what are their advantages over risk-ranking?

- No alternative methods currently.

Question 5) We have modified the definition of risk-based. Is the new definition more understandable?

- Yes, as clear as the first.
- Need to understand the self-regulation programs and industry needs to increase communication to let agency know what is currently out there.