Risk Ranking and Risk Prioritization Tools

Workshop on Produce Safety in Schools Sherri B. Dennis, Ph.D. FDA/CFSAN/OFDCER/RACT October 28, 2009

Managing Food Safety Risk

- We have a full table
- Trying to do everything means that nothing gets done well
- Have to make decisions on where we will focus our efforts



Risk Ranking: Terminology

Also referred to as:

- Hazard ranking
- Risk attribution
- Comparative risk assessment
- Applied to identify the most significant public health risks for a given situation
- Used in other fields engineering, insurance, transportation and environmental sciences



Risk Prioritization

- Risk prioritization goes beyond risk ranking in that it compares scenarios (combinations of specific commodities, hazards, and control measures) using multiple criteria, and not just the public health risk
 - Some of these additional criteria may include:
 - o cost of interventions or control measures
 - o feasibility of implementing control measures
 - o practicality of control measures
 - effectiveness of control measures
 - level of public concern
 - o level of certainty in the estimates
 - political will

Risk Analysis

Comprised of three components:

- Risk management
- Risk assessment
- Risk communication



What Triggers Risk Management?

Four broad types

- Crisis: real or perceived public outcry; media coverage; outbreak
- Science/technology: new knowledge uncovers a public health hazard of previously unknown risk
- Emerging or "on the horizon": environmental events affecting products
- **Strategic**: needs identified through systematic planning

Examples of Risk Management Decisions

- Conduct additional research
- Detention of imported product
- Develop action plan
- Do nothing (it's a decision!)
- Education and outreach
- Enforcement action, industry recall
- Guidance
- Preventative control program e.g. HACCP
- If safe—approve; if not safedisapprove

- Encourage industry innovation
- New legal theory
- New policy
- New technologies
- Performance standard
- Policy or regulation
- Remove from the market
- Seizure
- Set and enforce tolerance levels
- Untitled and Warning letter

Risk Assessment: The Basics

Risk assessment is...

- a systematic tool to better understand the complex interaction of hazards, food and human hosts
- o one of the most objective and scientific ways to
 - analyze the complexities of our food supply system
 - focus our food safety efforts
 - determine the relative effectiveness of prevention and control practices
- an approach to integrate science with state-ofthe-art information technology to help manage food safety risks

Risk Assessment: The Basics

- A process to describe what we know and how certain we are of what we know
- Answers 4 key questions:
 - What can go wrong?
 - How likely is it to occur?
 - What are the consequences?
 - What factors can influence it?



Qualitative Semi-quantitative (2) Quantitative

Example: Qualitative

2007 CFSAN Domestic Priorities List

Goal..

The purpose of the 2007 'priority' list is

 to target field resources toward higher public health risk problems



2007 CFSAN Domestic Priorities List: Features

- Ranked food/hazard pairs into 3 qualitative bins
 - o higher, moderate, lower risk
- Based on 2 criteria:
 - Likelihood of an adverse event from consumption
 - Severity of hazard

Data and Information Collection

The worksheet was designed to:

- Be flexible and easy to use
- Provide a transparent decision-making process
- Consider both data and expert opinion

Domestic Product/Hazard Prioritization Worksheet				
Name:	Office:		_ Da	ate:
Product Category	Identify Specific Product	Hazard C	ategory	Identify Specific Hazard
Additives		Bacterial		
Cosmetics Dainy/Egg	!	Viral		
Dietary Supplements		Chemical		}
Infant Formula/Med. Food	:	Natural toxin		
Plant Products		Allergen		
Seafood		Serious Labelin	g Deficiency	/
Other		Other (e.g., BT)		
Characteristics			Check	Other Pertinent
			All That	Information
			Apply	
Evidence of Hazard Ident	Ified with Product (give no. &	timeframe) /		
Recalls [ex., Class I, Cl	class II, or class IIIj	+ + +	\sim	
Adverse Event Report	ts	$\neg \lor \leftarrow \dashv$	\rightarrow	
Outpreaks associated Over/Linder fortification	(circle one)	$\rightarrow \forall$		
Sample data	sin (circle one)	$\prec \leftarrow \leftarrow$		
Toxicology data			$\overline{}$	
 Other (identify & explain) 		$\rightarrow \land \land \uparrow$		>
Exposure /		$\overline{}$		
Is the product reasonably likel	ly to be consumed by a populati	ion that is	\geq	
vulnerable/susceptible to this	hazard?	\neg		
How frequently is this product	consumed?	< ノニ		
Would you expect to find cont	ardination of this produkt once r	ver veer?		
More?/Less?	and another mis produce once i	year:		
Severity of Effect: (circle one bei	ow or logntify on attached cost per haza	ard list)		
 Very High (Iffe threatening, de 	ath or permanent disability reasonably	likely to occur)		
 High (serious liness, permaner 	nt or temporary disability may occur)			
 Medium (Minor or moderate ill — Low (No disability or physical or — Low (No disability or physical or	ness which is unlikely to result in disable	iity)		
 Other (Identify & explain) 	omplaints,			
Sources of Hazard in the	Farm-to-Table Continuum			
Where does contamination typ	pically occur? How? (Identify typi	cal violations to		
practices that could result in cont	amination- ex.GAP's, GMP's)			
Processing facility	(ex., GAP's) (ex., GMP's, HA	CCP)		
 Warehouse/Transport 	Warehouse/Transport(ex. GMP's)			
Retail(ex., temp. abuse)				
Consumer (ex., cross contamination) Other (identify & axplain)				
Is product typically processed	or treated after the point of con	tamination?		
YesNo				
If yes, will the processing/trea	tment eliminate the hazard?			
Evidence of Problems Ide	Intified with Facilities (give n	o. & timeframe)		
 Official Action Indicated 				
 Voluntary Action Indicate 	ed			
No Action Indicated				
spectronal Findings: Sinificant bazard identified? (describe in remarks)				
Other hazard (Identify: ex. filth, uncertified color additives)				
Adverse Event Reports				
Outbreaks traced back to facility				
Industry-wide problem?				
Cther (Identity & explain)				
wiscellaneous informatio	II (ie, Federal/State MOU's, 3 rd Pa	rty inspections)		
				I

Likelihood (How many people get ill)

Factors considered:

- The epidemiological link between the hazard and health effect due to consumption/use of the product (i.e., outbreaks)
- Frequency and level of the hazard associated with specific product (i.e., surveys, recalls)
- Frequency of consumption or use of product and amount
- Effect of production, processing, handling in terms of how they influence the hazard in the product at the point of consumption/use (i.e., lethality step in processing)

Severity (How ill do people get?)

- Factors considered:
 - Typical outcome (e.g., diarrhea; death)
 - Duration of illness
 - Long-term problems after initial illness (e.g., chronic sequelae)?
 - Is the entire population susceptible or a specific at-risk subpopulation (e.g., infants, elderly)?

Relative Risk Ranking

		Likelihood			
		Unlikely (no illnesses)	Likely (some illnesses)	Very likely (many illnesses)	
Severity	Moderate (mild)	lower	lower	medium	
	Serious (incapacitating)	lower	medium	higher	
	Severe (life- threatening)	medium	higher	higher	

Example: Semi-quantitative

Produce Risk Ranking Tool

Produce RR Tool: Purpose

- Transparent and systematic method
- Compare different commodity/ pathogen combinations to determine which present the most significant risks and prioritize them as candidates for interventions
- Identify higher-risk combinations for subsequent quantitative microbial risk assessment efforts



Produce RR Tool: Features

Characterize risk by:

- 9 criteria (grouped into 4 dimensions)
- 4 bins (scores)
- 5 weights
- Identify commodity/ hazard combinations based on outbreak data
 - 11 commodity categories
 - 3 hazard categories
 - Total 51 commodity/ hazard pairs evaluated

Dimensions & Criteria

Strength of Epidemiological Association

- Epidemiological link
- Disease multiplier
- Severity of Disease
 - Hospitalization rate
 - o Death Rate
- Pathogen Characteristics that Affect Disease
 - Population susceptibility
 - Infectious dose
- Commodity Characteristics
 - Prevalence of contamination
 - Consumption
 - Growth potential/ shelf life

Example Scoring: Epi Link

Score	Category	No. of Outbreaks	Total Cases
1	Weak	any	≤ 100
2	Moderate	1 - 2	> 100
3	Strong	3 - 5	> 100
4	Very strong	> 5	> 100

Produce RR Tool: Results

Top 14 Commodities & Pathogen (Score)

- Leafy greens & *E coli* 0157:H7 (70)
- o Tomatoes & Salmonella enterica (61)
- o Leafy greens & Salmonella enterica (59)
- o Melons & Salmonella enterica (59)
- Mixed produce & *E coli* 0157:H7 (59)
- o Crucifers & *E coli* 0157:H7 (56)
- Melons & *E coli* 0157:H7 (56)
- o Mixed produce & Salmonella enterica (52)
- Herbs & *E coli* 0157:H7 (50)
- Green onions & Cryptosporidium parvum (50)
- o Carrots & Salmonella enterica (50)
- Non-citrus fruit & Salmonella enterica (50)
- Leafy greens & Norovirus (50)
- Tomatoes & Norovirus (50)

Example: Semi-quantitative

iRISK: A web-based comparative risk assessment tool

iRisk – An On-Line Tool for Comparing Food Safety Risks

- Assess public health impacts for chemicals and pathogens
- Compare food risks at any stage, throughout the food supply system
- Allows the sharing of data and models
- Current version in beta testing public availability planned

Save Sav	e and Close Save and New Close Delet	e <u>help</u>
Risk Scenar	io: New	
🖨 Informa	ition	
Name:	Pathogenic E. coli from Lettuce	
Hazard:	Pathogenic E. coli 😽	
Food:	Head Lettuce 💌	
Process Model:	Head Lettuce Processing V (Please select Food an first)	nd Hazard
Consumption Model:	U.S. Consumption of Head Lettuce across All Ages velocities Food first)	(Please
Dose Response Model:	Beta-Poisson for Pathogenic E. coli 💙 (Please selec First)	t Hazard
pDALY Template:	Template for Exposure to Pathogenic E. coli in Head Le	ettuce 🔽
Description:		~
		~
Modified By:	N/A Created By:	N/A
Modified On:	N/A Created On:	N/A
Create Repo	rt	

iRisk: Output

An example of the first part of the output for a single simple scenario

FDA Risk Scenario Summary Report Report Time: 2008-Oct-23 20:40:16 PM						
Disclaimer and introduction will go here.						
Scenario	Final Concentration (log cfu/g microbial, g/g chemical)	Final Prevalence	Mean Risk of Illness	Total EO or Consumers	Total DALYs	Annual DALYs
Pathogenic E. Coli in Lettu Exponential	ce: -8.97E-1	1.00E-2	0.59	3.65E+10	2.40E+6	2.40E+8
Scenario details are included on following pages.						

Example: Quantitative

2003 FDA/FSIS *Listeria monocytogenes* in Ready-to-Eat Foods

2003 FDA/FSIS *Listeria monocytogenes* in Ready-to-Eat Foods Risk Assessment

The problem:

Which foods should receive the most regulatory attention in order to improve public health?



2003 LM RTE RA: Features

- Compares risk of listeriosis from 23 categories of ready-to-eat foods
 - E.g., seafood, cheese, produce, meat, salads
- Compares risk for 2 matrices
 - Risk per serving (individual risk)
 - Risk per annum (population risk)
- Compares risk for different populations
 - Three at-risk subpopulations
 - The total population



2003 Listeria RTE Foods Risk Assessment: Results

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Results: Risk Categories

Decreased Risk Per Annum			
A and B	C and D	E	
<u>Very High Risk</u> Deli Meats Frankfurters (not reheated)	High Risk Pátê and Meat Spreads Unpasteurized Fluid Milk Smoked Seafood	Moderate Risk No food categories	
High Risk High Fat and Other Dairy Products Pasteurized Fluid Milk Soft Unripened Cheese	Moderate Risk Cooked RTE Crustaceans	Moderate Risk No food categories	
Moderate Risk No food categories	Moderate Risk Deli Salads Dry/Semi-dry Fermented Sausages Frankfurters (reheated) Fresh Soft Cheese Fruits Semi-soft Cheese Soft Ripened Cheese Vegetables	Low Risk Preserved Fish Raw Seafood	
Moderate Risk No food categories	Low Risk No food categories	Very Low Risk Cultured Milk Products Hard Cheese Ice Cream and Frozen Dairy Products Processed Cheese	

Conclusion

Steps in risk assessment/ risk management:

- Clearly define the food safety problem to be addressed
- Decide approach and key assumptions
- Develop criteria (for risk ranking)
- Conduct assessment; validate and verify results
- Provide assessment results to decision-makers
- Decision-makers consider options; make decisions and implement
- Important: periodically review, evaluate & modify decisions, if needed

Questions or Comments?



Man's mind, once stretched by a new idea, never regains its original dimensions.

~Oliver Wendell Holmes