There is no official explanation for the significant policy change, but one official did acknowledge they "dropped the ball" by not announcing it.

Agency officials told **Food Safety News** they "intended to announce it in a Federal Register notice," but haven't because they've been busy issuing other policy changes. The agency said it's "preparing the documentation around this" and intends to explain the new approach.

FSIS officials argue that the new system is more sophisticated and replaces the old "cookie cutter" audits.

The agency now uses a self reporting tool, known as SRT, that allows countries to self-report information to FSIS. Foreign inspectors provide information to the agency on things like preventive controls, microbiological and chemical testing, sanitation and government oversight. The self reporting tool has been supplementing in-country audits since 2010, according to the agency.

"We get more information from countries on an ongoing basis," said an FSIS official. "We're going to do less in-country audits."

"This is more of a document approach," said one former FSIS official, adding that SRT is more cost-effective than extensive onsite audits. "It doesn't make sense to keep going back to the countries that don't have problems."

The agency is already using a tiered approach to rank countries based on risk – they look at SRT submissions, past problems and the results of FSIS' re-inspection testing at the ports of entry. The criteria have not been made public.

Budget and transparency concerns

There is some disagreement about what motivated FSIS to adopt a new approach to foreign inspection.

Agency officials insist that budget constraints were not the reason for scaling back in-country visits. House Appropriations Committee staff confirmed that FSIS has received appropriations on par with what they've requested.

But a former FSIS official from the Office of International Affairs told **Food Safety News** that budgetary pressures were a major factor in the change.

"The budget restrictions had pretty much forced the agency to re-evaluate the most cost-effective way to do audits," they said, noting that the agency is trying to transition to a more risk-based approach across the board.

FSIS said the new approach was suggested by the National Advisory Committee on Meat and Poultry Inspection (NACMPI) in August 2008, but consumer advocates dispute the claim.

One of the recommendation documents from the meeting states that the "length of time between audits can be based more on risk and compliance history in the foreign country," and that "a three-tiered system may be appropriate," but the documents don't get much more specific.

"I don't see anything in the document that says, 'It's fine for you to go three years without auditing a country's system,'" said longtime consumer advocate Carol Tucker-Foreman, who served as Assistant Secretary of Agriculture for Food and Consumer Services under the Carter administration. "I've never seen anything that outlines the grounds for such an approach."

In-country audits are part of what the agency often calls a "triad of protection" for imported meat and poultry. First, USDA must establish "equivalency," determining that the importing country has a food safety system in place that's on par with the U.S. system. Once a country is given the go-ahead (only 34 countries are currently approved), the USDA's Food Safety and Inspection Service continually monitors the safety of imported products through strict re-inspection at the port of entry, by testing for dangerous pathogens, and by conducting "ongoing audits" to ensure the countries are living up to their equivalency designation.

Dr. Richard Raymond, the former Under Secretary for Food Safety, who led FSIS under the Bush administration, went public with his concerns about reducing the frequency of foreign audits this week. In a Meatingplace op-ed published Monday, Raymond questioned whether regular foreign audits were a casualty of tough budgetary times.

"I've always considered our foreign inspection program one of the crown jewels of our food safety system," Raymond told **Food Safety News**. "Frequent audits are important. Without them, people cut corners – it's human nature."

Data show steep drop in foreign inspections

During the Bush administration, in-country audits generally happened annually, but, according to data provided to **Food Safety News** by FSIS earlier this month (which were posted online Wednesday), the number of in-country audits has dropped dramatically under the Obama administration.

Online documents show that from 2001 to 2008 FSIS inspectors were routinely evaluating, in-person, the foreign plants processing meat for American consumers. The number of countries audited annually, with only one exception (in 2006 there was a large drop in audits), was between 25 and 32, so FSIS was auditing an average of 26.4 countries per year. From 2009 to 2012, however, the number of countries audited annually dropped to between 3 and 20, so FSIS was auditing an average of 9.8 countries per year.

Countries Audited Per Year 2001 - 2012 (Bush years red, Obama years blue)

Undo

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INFOGRAPHIC: A look at country audits conducted by FSIS 2001 to 2012.