



FSIS Food Defense: Food Safety Modernization Act Considerations

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FSMA and Food Defense

- **FSMA's intent: provide new tools for FDA to prevent intentional contamination of food**
- **USDA FSIS supports these efforts**
 - **FSIS will participate in interagency discussions and reviews**
 - **FSIS' support/participation will help ensure continued FSIS-FDA consistency in food defense principles**
 - **Continues a 10 year federal partnership on food defense**



FSIS “Model” for Food Defense Plans

- **2004: FSIS Proposed Rule for Food Defense Plans**
 - Federal establishments required to develop, implement, and maintain plans to prevent intentional contamination
 - Plans to be reviewed annually and modified as appropriate
- **In response, industry proposed FSIS allow voluntary adoption of food defense plans**
 - Industry to work collaboratively with government to achieve goal of food protection, assist with outreach
 - FSIS to provide industry with tools they need for food defense. Recent tools include the General Food Defense Plan, web-based FSIS Food Defense Risk Mitigation Tool
- **FSIS will consider requiring food defense plans (make rulemaking a priority) if voluntary adoption was unsuccessful**



2010 Food Defense Survey

- **Food defense is a Performance Goal for FSIS**
 - **By 2015 90% of regulated facilities are to have voluntarily adopted and have a functional food defense plan**
- **Continued positive movement in the voluntary adoption of food defense plans**
 - **Overall: 74% of all official establishments have a functional food defense plan (up from 62% in 2009)**
 - **Large establishments: 97% (same as 2009)**
 - **Small establishments: 82% (up from 72%)**
 - **Very small establishments: 64% (up from 48%)**



Food Defense – FSIS Future

- **Continue to follow HSPD 9 – conduct updates to vulnerability assessments every 2 years**
- **Conduct new vulnerability assessments**
- **Review and revising FSIS directives as they relate to food defense and the DHS color coded Homeland Security Advisory System**
- **Continue to review and revise (and where appropriate provide new) guidance and tools for the industry and directives to our inspectors**
 - **Recent tools include the general food defense plan and the online risk mitigation tool**



Food Defense – FSIS Future cont.

- **Recognize that FSMA provides for new collaboration activities with our partner agencies**
- **Goal is to be consistent with FDA, as appropriate and possible with numerous priorities to ensure public health**
- **Infrastructure is in place to continue and enhance efforts that result in voluntary adoption of food defense for FSIS regulated establishments**
- **To date, have been pleased with the results of voluntary adoption of food defense principles and plans by FSIS regulated facilities—provides a model for working collaboratively with industry**