Food Defense Plan
Security Measures for Food Defense

Establishment Name: _____

Establishment Location (city, state): _____

FSIS Establishment Number: _____

By signing here, I acknowledge that this establishment has measures in place in accordance with this document.

Print Name: _____ Title: _____

Signature: _____ Date: _____

Food Defense Plan
Security Measures for Food Defense

Food Defense is having measures in place to reduce the chances of someone intentionally contaminating the food supply in order to kill or hurt people, disrupt our economy, or ruin your business.

PURPOSE:

This voluntary plan documents your measures to protect food and food production processes from intentional harm. ***Review of this plan and signing the cover sheet will result in a Food Defense Plan for your FSIS-regulated establishment.***

BENEFITS: By having a Food Defense Plan, you will contribute to a safer and more secure food supply. You will also protect public health, your employees, and your livelihood. A functional* food defense plan may also:
- o reduce the risk of unsafe product and economic loss,
- o reduce theft,
- o reduce the need for additional regulation on food defense, and
- o reduce company liability.

INSTRUCTIONS:

1. Review the attached plan.

2. Sign the cover page.

3. On an annual basis, review this plan and document that you did so on the form in **Attachment B**.

This food defense plan is organized in four sections: (1) Outside Security Measures, (2) Inside Security Measures, (3) Personnel Security Measures, and (4) Incident Response Security Measures. **Attachment A** provides a list of tools or additional security measures that an establishment may consider or may already have in place. You may also have other plans that contribute to a food defense plan such as an emergency plan, a recall plan, a security plan, etc. **Attachment B** is a form that can be used to document your annual review of your food defense plan.

*The four elements that make up a *functional* food defense plan:

1. **Develop:** Reviewing and signing this document fulfills this element.

2. **Implement:** Having measures described in this document fulfills this element.

3. **Test:** Periodic monitoring fulfills this element. This can be done using simple measures, such as checking locked doors or making unannounced perimeter checks. Monitoring can be documented using a form, such as **Attachment B**. Not all security measures need to be tested at the same frequency.

4. **Review and Maintain**: Reviewing the plan at least annually, revising the plan as needed, and taking appropriate actions fulfills this element

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This plan was developed through a joint effort between RTI International, the HACCP Consulting Group, a Focus Group of industry representatives, and the U.S. Department of Agriculture's Food Safety and Inspection Service.

Outside Security Measures
(Examples: door locks, lighting, monitoring loading/unloading)

> **GOAL:** **To prevent unauthorized access by people, or entry of unapproved materials to the facility.**

This establishment has in place at least one of the following measures for outside security.

1.1   Physical Security

a. Plant boundaries are clear and secured to prevent unauthorized entry (for example, fences installed, no trespassing signs posted)

b. Entrances are secured (for example, locks and/or alarms installed and operating)

c. Plant perimeter is periodically monitored for suspicious activity

d. Outside lighting is present to deter unauthorized activities

e. Other access points such as windows and vents are secured

f. Outside storage on the premises is protected from unauthorized access

g. Other

1.2   Shipping/Receiving Security

a. Incoming shipments are examined for potential tampering

b. Incoming and outgoing vehicles are examined for suspicious activity

c. Loading and unloading activities are scheduled and/or monitored

d. Loading dock access is controlled (for example, monitored or locked)

e. Incoming shipments are secured with locks or seals

f. Outgoing shipments are locked or sealed

g. Other

1.3   Mail Handling Security

a. Mail is handled away from food including ingredients and packaged food product

b. Employees who handle mail are aware of proper handling of suspicious mail and U.S. Postal Service guidelines

c. Other

Inside Security Measures
(Examples: signs, observations, restricted access)

> **GOAL:** **To protect product from intentional contamination throughout the production process.**

This establishment has in place at least one of the following measures for inside security.

2.1   General Inside Security

a. Suspicious packages are reported to appropriate personnel

b. Restricted areas of the establishment are clearly identified

c. Previously unattended materials are checked before use

d. Unexpected changes in inventory (product or equipment) are reported to appropriate personnel

e. Emergency lighting is in place

f. An emergency alert system is identifiable, tested, and reviewed with emergency contacts (for example, police or fire personnel)

g. Other

2.2   Slaughter/Processing Area Security

a. Access to live animals, ingredients, and packaged product is restricted

b. Access to animal handling areas and/or carcass coolers is controlled

c. Access to process control equipment such as ovens, mixers is restricted

d. Ingredients are examined for possible tampering

e. Records ensure traceability for one step backward, one step forward, or both

f. Other

2.3   Storage Security

a. Access to storage areas is restricted

b. Stock rotation (first in, first out) is practiced

c. Labels and packaging materials are controlled to prevent theft and misuse

d. Periodic examinations for tampering of materials in storage are performed

e. Other

Not all measures suggested are appropriate or necessary for every facility.

2.4   Ingredients/Water/Ice Security

a. Restrict access to storage tanks for potable water and to water reuse systems.

b. Access to lines that transfer water or ingredients are examined and restricted

c. Access to plant ice-making equipment is controlled

d. Restricted ingredients (for example, nitrites) are controlled

e. Supplier food safety/security information is requested

f. Other

2.5   Chemical/Hazardous Material Control Security

a. Chemicals/hazardous materials, including pesticides, cleaning or laboratory materials, and sanitizers, are in a restricted area or secured by a lock

b. Maintain an up-to-date inventory of hazardous materials and chemicals, and investigate discrepancies.

c. Potentially hazardous waste (biological or chemical) is controlled and disposed of properly

d. Other

2.6   Information Security

a. Access to sensitive information such as site plans and processing details is controlled

b. Access to computer systems is protected through firewalls and/or passwords

c. Other

Personnel Security Measures
(Examples: check references, use visitor log or sign-in, or check IDs)

GOAL: To ensure that only authorized personnel are in the facility at any time

This establishment has in place at least one of the following measures for personnel security.

3.1   Employee Security

a. A method to recognize or identify employees in the facility is in place

b. Background or reference checks are conducted for new hires[1]

c. Employees have restrictions on what they can bring in or take from the facility (for example, cameras)

d. Other

3.2   Non-employee Security (Example: visitors, contractors, guests, customers, truck drivers)

a. A log of non-employees entering the establishment is maintained

b. A method to recognize or identify non-employees in the establishment is in place

c. Non-employees are chaperoned on-site

d. Non-employees are restricted to appropriate areas

e. Non-employees have restrictions on what they can bring in or take from the facility

f. Other

3.3   Security Training

a. Awareness training on security measures is provided to new employees[2]

b. Refresher awareness training on security measures is offered to employees on a periodic basis

c. Employees are trained to report suspicious activities or unusual observations

d. Other

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[1] You can electronically verify the employment eligibility of your new hires at http://www.dhs.gov/files/programs/gc_1185221678150.shtm. E-verify is an internet based system operated by the federal government that is available for employers to use at no charge.

[2] You can access free food defense awareness training for your employees at http://www.fda.gov/Food/FoodDefense/Training/default.htm

Incident Response Security Measures
(Examples: reference your emergency plan, security plan or other)

GOAL: **To respond quickly to a product contamination threat or event using planned measures**

This establishment has in place at least one of the following measures for incident response security.

4.1 Investigating Security Concerns

a. Have procedures to ensure that adulterated or potentially harmful products are held.

b. Customer comments are investigated

c. Reporting unusual activities is encouraged

d. Information is available to employees on how to respond to phone or other threats

e. Employees have the ability to stop activities to minimize a potential food defense incident

f. Reported security breaches (for example, alarms, suspicion of tampering) are investigated

g. Other

4.2 Emergency Contact Security

a. Plant personnel contact information is kept up to date

b. Emergency contact lists are kept up to date

c. Other

4.3 Other Plan Security

a. A product recall plan is maintained and periodically reviewed

b. Key personnel are trained in product recall/withdraw procedures

c. Other

ATTACHMENT A

List of Tools or Possible Security Measures for Food Defense

This attachment provides a list of tools or additional security measures that an establishment may consider or may already have in place. These are provided to assist establishments in tailoring the plan to meet their specific needs.

1.   Outside Security Tools

Physical Security

- Ensure proper lighting to monitor the establishment outdoors at night and early morning.
- Install self-locking doors and/or alarms on emergency exits.
- Ensure the following are secured with locks, seals, or sensors when unattended (after hours/weekends) to prevent unauthorized entry:

  - Outside doors and gates
  - Windows
  - Roof openings
  - Vent openings
  - Trailer (truck) bodies

  - Tanker truck hatches
  - Railcars
  - Bulk storage tanks/silos
  - Loading ports
  - Hose /Pump stations

- Regularly conduct and document security inspections of storage facilities, including temporary storage vehicles.
- Restrict outdoor access to water wells/sources.

Shipping / Receiving Security

- Closely monitor loading and unloading of vehicles transporting raw materials, finished products, or other materials used in food processing.
- Inspect tanker trucks and/or rail cars to detect the presence of any material, solid or liquid, in tanks prior to loading liquid products. Load only when appropriate. Report/record results.
- Control access to loading docks to avoid unverified or unauthorized deliveries.
- Require advance notification from suppliers for all deliveries.
- Immediately investigate suspicious changes in shipping documents.
- Check all deliveries against a roster of scheduled deliveries.
- Hold unscheduled deliveries outside establishment premises pending verification.
- If off-hour delivery is accepted, require prior notice of the delivery and an authorized person to be present to verify and receive the delivery.

- Check less-than-truckload (LTL) or partial load shipments for content and condition.

- Require incoming shipments of raw product, ingredients, and finished products to be sealed with tamper-evident or numbered, documented seals and verify the seals prior to entry. Reject if seals are broken or missing.

- Select transportation companies and suppliers with consideration of security measures that they use.

- Examine returned goods at a separate location for evidence of tampering before salvage or use in rework.

- Maintain records of disposition of returned goods.

- Require drivers or delivery personnel to provide identification, preferably with a photo ID. Record names.

- Minimize the time a truck is unlocked during loading or delivery.

2. Inside Security Tools

General Inside Security

- Install and monitor security cameras.

- Increase visibility within the establishment (for example, improve lighting, openness, increase supervision, add cameras).

- Regularly take inventory of keys to secured/sensitive areas of the establishment.

- Restrict access to controls (by locked door/gate or limiting access to designated employees) for the following systems:

  - Heating, ventilation, and air conditioning (HVAC)

  - Propane, natural gas, water, electricity

  - Disinfection systems

  - Clean-in place (CIP) systems or other centralized chemical systems

Slaughter / Processing Area Security

- Maintain records to allow efficient trace backward or forward of materials and finished product.

- Reduce the time an area is left unmonitored.

- Reduce access to product containers or processing equipment.

- Do not allow unnecessary personal items within the production area.

Storage Security

- Maintain an access log for product and ingredient storage areas.

- Regularly check the inventory of finished products for unexplained additions and withdrawals from existing stock.

- Restrict access to external storage facilities to designated employees only.

Ingredients / Water / Ice Security

- Examine packages of ingredients before use for evidence of tampering.

- Restrict access to product, ingredient, and packaging storage areas to designated employees only (for example, by locked door/gate).

- Water is from a municipally controlled source

- Inspect water lines for possible tampering (perform visual inspection for integrity of infrastructure, proper connections)

- Make arrangements with local health officials to ensure immediate notification to the establishment if the potability of the public water supply is compromised.

Chemical / Hazardous Material Control Security

- Restrict access to the in-plant laboratory.

- Have procedures in place to control receipt of samples.

- Have a procedure in place to receive, securely store, and dispose of reagents.

Information Security

- Track customer complaints/comments for trends.

- Keep details of food defense procedures confidential as necessary.

- Have up-to-date establishment layout/blueprints for local law enforcement, including the fire department if needed.

3.   Personnel Security Tools

- Authorize appropriate employees to stop a process for significant concerns.

- Control access by employees and non-employees entering the establishment during working and non-working hours (use coded doors, receptionist on duty, swipe cards).

- Restrict temporary employees and non-employees to areas relevant to their work.

- Implement system to identify personnel with their specific functions, assignments or departments (for example, corresponding colored uniforms or hair covers).

- Prohibit employees from removing company-provided uniforms or protective gear from the premises.

- Maintain an updated shift roster for each shift.

4.   Incident Response Tools

- Establish evacuation procedures and include in food defense plan.

- Establish procedures for responding to threats as well as actual product contamination events.

- Pre-establish communication with local, state, and federal incident response personnel for a more efficient response.

ATTACHMENT B

Food Defense Plan Review Form

Complete this form to document your annual review of this Food Defense Plan.

Not all measures are required or need to be reviewed each time this form is completed.

Date of Annual Review	Person Who Conducted Annual Review (Name and Title)	Was the Food Defense Plan tested?* (Yes / No)

*Testing can be done using simple measures, such as checking locked doors or making unannounced perimeter checks.

NOTE: Make as many copies of this attachment as necessary.