

Food Defense

FSKN I 16

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GFSI Intermediate Requirement

- The company shall assess its ability to prevent intentional product tampering and put in place the appropriate preventive control measures.



Definition

US Bioterrorism Act 2002

US Department of Agriculture

- Activities associated with protecting the food supply from deliberate or intentional acts of contamination or tampering.

US Food and Drug Administration

– *Food defense* is the collective term used by the FDA, USDA, DHS, etc. to encompass activities associated with protecting the nation's food supply from deliberate or intentional acts of contamination or tampering. This term encompasses other similar verbiage (i.e., bioterrorism (BT), counter-terrorism (CT), etc.)

Food Safety vs Food Defense

Food safety addresses the accidental contamination of food products and focuses on biological , chemical and physical hazards

Hard to control, easy to predict

Food defense puts in place measures that reduce the food supply from becoming intentionally contaminated using a variety of chemicals, biological agents or other harmful substances by people who wish to cause harm.

Very hard to control, hard to predict

The Importance of Food Defense

- Increasing concerns on the number of incidents relating to the malicious contamination of food products.
- The establishment of measures in vulnerable areas within the food chain; food processing and distribution have been identified as being highly vulnerable
- Measures can only minimise risk and are based on systems and preventative measures

Food Terrorism – USA, 1984

- Rajneeshee Bioterror Attack – Dallas, Oregon
- Contaminated food items in 10 restaurants with Salmonella
- More than 750 illnesses
- 45 hospitalized

http://en.wikipedia.org/wiki/1984_Rajneeshee_bioterror_attack



Food Terrorism – USA, 2003

- Michigan supermarket
- Employee intentionally contaminated raw ground beef with nicotine (Black Leaf 40)
- At least 92 persons ill
- Recall of 1,700 pounds of ground beef
- Employee convicted and imprisoned

<http://www.cdc.gov/mmwr/preview/mmwrhtml/mm5218a3.htm>

USFDA – ALERT Food Defense Awareness Program

- Identifies five key points that industry and businesses can use to decrease the risk of intentional food contamination at their facility.

A – ASSURE

L – LOOK

E – EMPLOYEES

R – REPORTS

T – THREAT

ASSURE

- How do you ASSURE that the supplies and ingredients you use are from safe and secure sources?
 - Know your suppliers
 - Encourage your suppliers to take food defense measures
 - Request locked and/or sealed vehicles, containers, railcars
 - Supervise offloading of incoming materials



LOOK

- How do you LOOK after the security of the products and ingredients in your facility?
 - Implement a system for handling products
 - Track materials
 - Store product labels in a secure location and destroy outdated or discarded product labels
 - Limit access and inspect facilities
 - Keep track of finished products
 - Encourage your warehousing operations to practice food defense measures



EMPLOYEES

- What do you know about your EMPLOYEES and people coming in and out of your facility?
 - Conduct background checks on staff
 - Know who belongs in your facility
 - Establish an identification system for employees
 - Limit access by staff
 - Prevent customer's access to critical areas of your facility



REPORTS

- Could you provide REPORTS about the security of your products while under your control?
 - Periodically evaluate the effectiveness of your security management system
 - Perform random food defense inspections
 - Establishment and maintenance of records
 - Evaluate lessons learned



THREAT

- What do you do and who do you notify if you have a THREAT or issue at your facility, including suspicious behavior?
 - Hold any product that you believe may have been affected
 - Contact the appropriate authorities



FDA FIRST Program

Food Defense Awareness for Front Line Industry Workers

Follow company food defense plan and procedures

Inspect your work area and surrounding areas

Recognise anything out of the ordinary

Secure all ingredients, supplies and finished product

Tell management if you notice anything unusual or suspicious

FDA Guidance

1. Management
2. Staff
3. Public
4. Facility
5. Operations

Guidance for Industry: Food Producers, Processors, and Transporters:
Food Security Preventive Measures Guidance (revised October 2007).

[http://www.fda.gov/Food/GuidanceComplianceRegulatoryInformation/
GuidanceDocuments/FoodDefenseandEmergencyResponse/ucm083075.htm](http://www.fda.gov/Food/GuidanceComplianceRegulatoryInformation/GuidanceDocuments/FoodDefenseandEmergencyResponse/ucm083075.htm)

FDA Guidance – Management

1. Preparing for the possibility of tampering or other malicious, criminal or terrorist actions
2. Supervision
3. Recall Strategy
4. Investigation of Suspicious Activity
5. Evaluation Program

FDA Guidance – Staff

- Screening (pre-hiring, at hiring, post hiring)
- Daily Work Assignments
- Identification
- Restricted access
- Personal items
- Training in Food Security Procedures
- Unusual behaviour
- Staff health

FDA Guidance – Public and Facilities

- Visitors
- Physical security
- Laboratory safety
- Storage and Use of Poisonous and Toxic Chemicals

FDA Guidance – Operations

- Incoming Materials and Contract Operations
- Storage
- Security of Water and Utilities
- Finished Products
- Mail Packages
- Access to Computer Systems

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