



Food Defense

Requires a Great Offense

by Melissa Vaccaro, MS, CHO

As professionals in the foodservice industry, we are hospitality driven. We invite everyone into our establishment to enjoy our services and food. That invitation does not come without risk. As much as we may hate to admit it, some people are just out to cause harm and panic. Although the U.S. has relatively few threats to our food supply at the retail level, they have happened and cannot be ignored. The concept is not to

be fearful or suspicious of strangers that are visiting your establishments, but to create a proactive plan, be educated about food defense and know that should something go badly, you and your employees are prepared to handle the situation. By all means, don't have an "it won't happen to me" attitude.

It *can* happen.



CREATE A FOOD DEFENSE PLAN FOR YOUR FACILITY

EXAMPLES OF INTENTIONAL INCIDENTS

- In 2010, a disgruntled restaurant employee contaminated salsa with pesticide. This incident caused a reported 48 people to become ill.
- In 2007, an unhappy temporary employee contaminated Gyoza—better known as Japanese potstickers—three times with a pesticide. This incident caused a reported

10 people to become ill and the investigation of 586 individuals that had access to the refrigeration room.

- In 2003, a disgruntled supermarket employee added a nicotine-based pesticide to 200 pounds of ground beef. Their action triggered illness in a reported 92 people.
- In 1993, an angry former employee contaminated a tray of doughnuts and muffins with *Shigella dysenteriae* Type 2, which caused 12 employees to suffer severe gastrointestinal illness and four employees were hospitalized.
- In 1984, several cult members in Oregon added salmonella to multiple restaurant salad bars in an attempt to affect the outcome of local elections. This incident resulted in 751 illnesses and hospitalization of 45 people.

Food defense is not the same as food safety.

Food safety focuses on protecting food from unintentional or accidental contamination.

Food defense focuses on protecting food from deliberate contamination intended to cause harm.

Since 9-11, numerous federal agencies have focused on food defense and have created forms, plans, educational videos, and documents to educate all of us, including regulators, industry, academia, and the public. The focus of this segment is to overview some strategic proactive food defense concepts, and to provide resources to gain further knowledge on the concept of food defense.

STANDARD OPERATING PROCEDURES FOR FOOD DEFENSE

Your Food Defense Plan should include Standard Operating Procedures (SOPs). SOPs are specific written procedures that establish acceptable practices and procedures for the facility and its employees. SOPs are only effective if they are understood and followed. SOPs need to address four key concepts: Employees, Customers, Vendors, and Facilities. These SOPs are based on awareness, but you should certainly develop more detailed SOPs to address specific items such as reporting, forms, or procedures.

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Managers have an enormous obligation when it comes to food defense. Managers must:

- Encourage communication among all employees.
- Decrease susceptibility by having written strategies, including recall procedures, training, and practice drills.
- Decrease availability of potential contamination by having secured areas for storage of chemicals, proper labeling, and access by employees.
- Identify possible inside threats by conducting background checks, keeping track of employees, and restricting personal items at the workplace.
- Identify possible outside threats by purchasing only from approved vetted vendors, requiring vendors to have their own food defense plan, knowing when deliveries are expected, inspecting delivery vehicles, securing the perimeter of the facility via fences, cameras, locked doors, and sufficient lighting.
- Monitor customer and public areas.
- Hold food employees accountable and continually educate them on your Food Defense SOPs.

EMPLOYEE SOPs

- Be a responsible employee. Communicate any potential food defense issues to your manager.
- Be aware of your surroundings and pay close attention to customers and employees who are acting suspiciously.
- Limit the number of personal items you bring into your work establishment.
- Be aware of who is working at a given time and where (in what area) they are supposed to be working.
- Periodically monitor the salad bar and food displays.

- Make sure labeled chemicals are in a designated storage area.
- Make sure you and your coworkers are following company guidelines. If you have any questions or feel company guidelines are not being followed, ask your manager for assistance.
- Take all threats seriously, even if it is a fellow coworker blowing off steam about your manager and what he or she wants to do to get back at your manager or your company; or if he or she is angry and wants to harm the manager, the customers, or the business.
- If the back door is supposed to be locked and secure, make sure it is!
- Be alert to inconsistencies. If you use a food product every day and it's supposed to be blue but today it's green, stop using the product and notify your manager.
- If you know an employee is no longer with your company and this person enters an "employees only" area, notify your manager immediately.
- Cooperate in all investigations.
- Do not talk to the media; refer all questions to your corporate office.
- If you are aware of a hoax, notify your manager immediately.

CUSTOMER SOPs

- Be aware of any unattended bags or briefcases customers bring into your operation.
- If a customer walks into an "employees only" area of your operation, ask the customer politely if he or she needs help, then notify a manager.

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FOUR STEPS FOR REPORTING A SUSPECT PRODUCT

1. If you suspect product tampering, report it to the Person in Charge (PIC) immediately.
2. The PIC should immediately report a suspected tampering incident to your local police department.
3. If the food contains meat or poultry, call the U.S. Department of Agriculture's Meat and Poultry Hotline at 1-800-535-4555.
4. If the food does not contain meat or

poultry (such as seafood, produce, or eggs), notify the Food and Drug Administration. For emergency questions, call the FDA's 24-hour emergency number at 1-866-300-4374 or 1-301-796-8240. For non-emergency questions, call the FDA Food Information Line at 1-888-SAFEFOOD.

VENDOR SOPs

- Check the identification of any vendor or service person that enters a restricted area of your operation and do not leave him or her unattended.
- Monitor all products received and look for any signs of tampering.
- When a vendor is making a delivery, never accept more items than what is listed on your invoice. If the vendor attempts to give you more items, notify your manager.
- When receiving deliveries:
 - Step 1. Always request identification.
 - Step 2. Stay with the delivery person.
 - Step 3. Do not allow the person to roam freely throughout your operation.

FACILITY SOPs

- Report all equipment, maintenance, and security issues to your manager.

- Document any equipment, maintenance, and security issues.
- Be aware of the inside and outside of your facility, including the dumpster area, and report anything out of the ordinary. **E**



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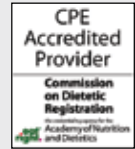
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Review Questions

FOOD PROTECTION CONNECTION

Reading *Food Defense Requires a Great Offense* and successfully completing these questions online has been approved for 1 hour of sanitation CE for CDM, CFPPs. CE credit is available ONLINE ONLY. To earn 1 San CE hour, access the online CE quiz in the ANFP Marketplace. Visit **www.ANFPonline.org/market**, select “**Publication**,” then select “**CE article**” at left, then search the title “*Food Defense Requires a Great Offense*” and purchase the article.



1. Food Defense is:
 - A. The unintentional or accidental contamination of food
 - B. The deliberate, intentional contamination of the food supply in order to cause harm
 - C. The assurance of a two-year supply of food in case of an emergency
2. An example of an Employee SOP is:
 - A. Limit the number of personal items you bring into your work establishment
 - B. Monitor all products received and look for any signs of tampering
 - C. Document any equipment, maintenance, and security issues
3. An example of a Facility SOP is:
 - A. Be aware of the inside and outside of your facility, including the dumpster area, and report anything out of the ordinary
 - B. Train employees regularly
 - C. Ask for identification when a delivery is made
4. If you suspect tampering you should immediately:
 - A. Tell the PIC
 - B. Call the FBI
 - C. Tell your regulator
5. Managers need to:
 - A. Train employees one time in food defense
 - B. Encourage employees to mind their own business
 - C. Encourage communication among all employees
6. SOPs are:
 - A. Specific written procedures that establish acceptable practice and procedures for the facility and its employees
 - B. Specific procedures that establish acceptable practices and procedures for the facility and its employees
 - C. Specific written procedures that establish practices for the facility managers
7. Your food defense plan should include:
 - A. Food Safety Standards
 - B. Standard Operating Procedures
 - C. Standard Operational Guidance

RESOURCES

1. **Food Defense 101** delivers training in preparedness against an intentional attack against our food supply. The courses provide an understanding of and guidance for developing a food defense plan(s) based on a common-sense approach. This course includes training on ALERT (Assure, Look, Employees, Reports, Threats). <http://www.fda.gov/Food/FoodDefense/ToolsEducationalMaterials/ucm353774.htm>
2. **Employees FIRST** is an initiative that food industry managers can include in their ongoing employee food defense training programs. Employees FIRST educates front-line food industry workers from farm to table about the risk of intentional food contamination and the actions they can take to identify and reduce these risks. <http://www.fda.gov/Food/FoodDefense/ToolsEducationalMaterials/ucm295997.htm>
3. **FDA Food Defense Plan Builder** is a user-friendly software program designed to assist owners and operators of food facilities with developing personalized food defense plans for their facilities. This tool harnesses existing FDA tools, guidance, and resources for food defense into one single application. The Food Defense Plan Builder guides the user through the following sections: Company Information; Broad Mitigation Strategies; Vulnerability Assessment; Focused Mitigation Strategies; Emergency Contacts; Action Plan; and Supporting Documents. <http://www.fda.gov/Food/FoodDefense/ToolsEducationalMaterials/ucm349888.htm>
4. **Food Related Emergency Exercise Bundle (FREE-B)** is a compilation of scenarios based on both intentional and unintentional food contamination events. It is designed to assist government regulatory and public health agencies in assessing existing food emergency response plans, protocols, and procedures that may be in place, or that they are in the process of revising or even developing. <http://www.fda.gov/Food/FoodDefense/ToolsEducationalMaterials/ucm295902.htm>
5. **Food Defense and Recall Preparedness: A Scenario-Based Exercise Tool:** This scenario-based exercise tool highlights the importance of having a voluntary functional food defense plan and written recall procedures. <http://www.fsis.usda.gov/wps/portal/fsis/topics/food-defense-defense-and-emergency-response>
6. **Food Safety and Inspection Service (FSIS) Food Defense and Emergency Response** website: <http://www.fsis.usda.gov/FoodDefense>
7. **Food and Drug Administration (FDA) Food Defense** website: <http://www.fda.gov/food/fooddefense/>
8. **Guidance for Industry: Retail Food Stores and Food Service Establishments:** Food Security Preventive Measures Guidance (2007) - <http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/ucm082751.htm>
9. **“If You See Something, Say Something” Campaign:** <http://www.fda.gov/downloads/Food/FoodDefense/UCM245306.pdf> (English Version)
10. **Active Shooter Preparedness:** <http://www.dhs.gov/active-shooter-preparedness>