DEVELOPING A FOOD DEFENSE PROGRAM

As it becomes increasingly important for food companies to have food defense programs, it is just as important that those programs be developed and implemented by experienced, knowledgeable persons.

by Lance Reeve

Source: FDA

It is more important now than ever before for operations in the food industry to develop food defense programs and mitigate the risks of intentional contamination. The U.S. food and agricultural sector has been pegged as one of our nation’s critical infrastructures. Specific cases of intentional tampering, workplace violence incidents, and cargo theft have occurred in the food industry in recent years. Customers and third-party auditors have begun to include food defense as part of their assessments and audits, and soon regulations will require that programs be in place to prevent intentional contamination.
Food Defense

Following are three questions and answers that provide the basics to help guide you in developing a food defense program or assessing that which you may already have in place.

We don’t have a food defense program. Where do I begin?
The FDA has been diligently working to provide resources and training tools to support the food industry in its efforts to establish food defense programs. Many of these programs and tools have been developed based on evaluations done by the FDA in partnership with the food industry and trade associations.

Some of its free tools are software programs for vulnerability assessments, guidance documents for food defense, and employee awareness and training programs. These tools, available at www.fda.gov/Food/FoodDefense, include:

- **Food Defense 101 (including ALERT).** The food industry plays an integral part in protecting the nation’s food infrastructure. Food Defense 101 provides training in preparedness against an intentional attack against the food supply. The courses provide an understanding of and guidance for developing a food defense plan based on a common sense approach.

- **Food Defense Plan Builder.** The Food Defense Plan Builder is a user-friendly software program designed to assist food facility owners and operators in developing personalized food defense plans. The tool harnesses existing FDA tools, guidance, and resources for food defense into one single application.

- **FREE-B.** The Food Related Emergency Exercise Bundle (FREE-B) is a compilation of scenarios based on both intentional and unintentional food contamination events.

- **Employees FIRST.** Employees FIRST is an FDA initiative that food industry managers can include in their ongoing employee food defense training programs. Employees FIRST educate front-line food industry workers about the risk of intentional food contamination and the actions they can take to identify and reduce these risks.

- **See Something, Say Something Campaign.** Documents highlight indicators of suspicious activities and recommended protective measures for food service and retail food establishments.

- **Vulnerability Assessment Software Tool.** This prioritization tool can be used to assess the vulnerabilities within a system or infrastructure in the food industry.

- **Mitigation Strategies Database.** This new database is one of several tools to help the food industry protect our nation’s food supply from deliberate acts of contamination or tampering. It provides a range of preventive measures that companies may choose to implement to better protect their facility, personnel, products, and operations.

- **Other Food Defense Preventive Measures Guidance Documents.** These documents have been designed to assist operators of various food-related establishments identify food defense countermeasures that could be implemented. There are five guidance documents available:
  - Cosmetics, processors, and transporters.
  - Retail food stores and food service establishments.
  - Dairy farms, bulk milk transporters, bulk milk transfer stations, and fluid milk processors.
  - Importers and filers.
  - Food producers, processors, and transporters.

Is there anything else I will need to develop an effective program?
The FDA support tools and resources will take a company a long way in developing a food defense program. However, a key element that can’t be provided through these tools and resources is experience and knowledge. Many food companies have very well-trained, educated, and experienced food safety personnel. Several food companies do not have employees with a background or experience in food defense, security or law-enforcement. Experienced and knowledgeable leaders are a must in order for any tools or resources to be effectively used, implemented, and managed.

Let’s talk about the key steps in implementing an effective food defense program.

1. **Food Defense Team and Food Defense Coordinator.** A team of individuals at the facility must be selected based on experience and knowledge to develop and manage the food defense program. This team should include a food defense coordinator (FDC) who will lead, direct, and make decisions about the food defense program. This FDC should be well versed in food defense, security principles, investigation strategies, and laws or regulations pertaining to security and food defense.

2. **Vulnerability Assessments.** The food defense team must be able to assess threats to the organization, identify vulnerabilities, assign a level of risk, and implement counter-measures or strategies to mitigate the vulnerabilities and risks.

3. **Food Defense Plan.** A comprehensive plan needs to be written to outline the elements implemented to mitigate the vulnerabilities and manage the day-to-day food defense initiatives the company implements. This plan should be detailed and comparable to a food safety plan written for managing unintentional hazards.
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Who should be involved in the development and implementation of my food defense program?

Like food defense, there are many resources and tools available to help companies develop an effective HACCP program. However, most food companies would not expect a detailed HACCP program to be implemented by individuals in the organization who have no experience or knowledge in food safety or HACCP principles. The tools and resources may allow them to develop a HACCP plan, but it would be questionable if proper hazards were identified, prerequisite programs were developed and implemented, critical controls points established and monitored, and the program properly validated.

Food defense tools and resources developed for the food industry are a good starting point, but not the end of the journey. Food companies must evaluate the need to hire full-time individuals, consultants, or other support personnel that can help complete each of the steps in developing an effective food defense program. Some companies have made the investment to hire persons with a law enforcement, military, or security background to assist in this development. These individuals are often located at corporate headquarters and lead efforts and initiatives with individual facilities. They provide support and direction to the local food defense team at the site; provide detailed training and education; lead vulnerability assessments; and assist in food defense plan writing, implementation, or management.

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Qualified food defense and security individuals are able to apply the guidance documents, tools, and resources to their facilities. For example, a guidance document or checklist can help an inexperienced person conduct the assessment; however, security experts or professionals are able to look beyond the checklist; understand other risk factors; recognize how countermeasures complement each other; and know what tools or systems must be in place to deter, detect, or delay intentional events.

The food industry has been presented with a new challenge. Several support tools and resources are available to help implement a food defense program. The industry’s challenge will be in making the decision to hire, use, or consult with security and food defense professionals who can provide the same level of expertise that one would expect from a person qualified and experienced in food safety principles to develop, implement, and manage a food safety program. AIB

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