

FOOD DEFENSE PROGRAM

PREVENTING THE DELIBERATE
CONTAMINATION OF FOOD

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Introduction

- Protecting the U.S. food supply from intentional adulteration has grown in importance since the attacks of September 11, 2001. In 2003, the President's Council of Advisors on Science and Technology wrote that "terrorist acts of a widely diffuse nature such as attacks on the food supply ... could become a preferred means of attack in an environment where terrorist networks have been 'decapitated' and their ability to communicate and raise funds significantly diminished."¹
- Additionally, disgruntled employees have been implicated in the deliberate contamination of food
- An example of this is the disgruntled employee of a Texas hospital who willfully tainted snacks in a staff break room that caused illness in 12 people.²
- Food defense protects your customers' health and your business reputation. While each business is unique, every facility can benefit from some basic defensive measures.
- It is important to note that deliberate contamination or "tampering" of food is a criminal act.

¹ President's Council of Advisors on Science and Technology, *The Science and Technology of Combating Terrorism*, July 2003, p. 5.

² The Department of Homeland Security's Role in Food Defense and Critical Infrastructure Protection, February 2007

Presentation Objectives

- ▣ To appreciate that any establishment may be subject to a deliberate attack
- ▣ To understand the FDA “ALERT” initiative
- ▣ To come away with some simple procedures you can put in place at your own establishment to better protect you, your staff, and your customers from deliberate food contamination

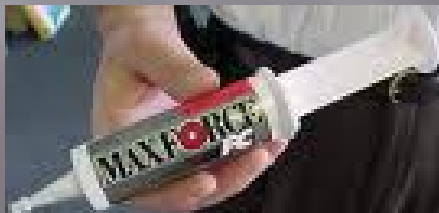
A good reason to not leave food unattended!

- On a small scale a disgruntled employee with access to a syringe could inject a toxin into a simple snack food.
- It is easy to see how tampering like this could go undetected until it is too late.



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Toxic materials are readily available, so deliberate contamination is a risk in any type of operation



! ALERT !

Utilizing the U.S. Food and Drug Administration's **ALERT** Initiative can help control deliberate food contamination.

What is **ALERT**? **ALERT** identifies key points that industry and businesses can use to raise awareness of food defense issues and decrease the risk of intentional food contamination.

- ▣ **A** = Assure - Foods used are from a safe secure source or supplier.
- ▣ **L** = Look - Checking on security of foods and ingredients in the facility.
- ▣ **E** = Employees - Knowing your employees and people coming into and out of your facility.
- ▣ **R** = Reports - Provide reports regarding the security of products under your control.
- ▣ **T** = Threat - What to do, and who to notify, if you have a threat or issue at your facility.

ASSURE

What are the steps that need to be taken to ASSURE foods used are from a safe secure source?

- ▣ Know your suppliers.
- ▣ Are they aware of Food Defense Measures?
- ▣ Maintain a chain of custody.
- ▣ Examine or inspect all supplies when they arrive.
- ▣ Monitor access to your establishment.

ASSURE

- ▣ Using reputable suppliers is a must. Home prepared foods are never to be accepted for use in a food service establishment



ASSURE

- ▣ Always have reliable staff available to inspect and document deliveries.



ASSURE

- ▣ Check with your suppliers to see if they practice appropriate food defense measures.



ASSURE

- Don't let food sit outside unguarded and unprotected



ASSURE

Do not
accept
deliveries
that arrive
before you
open for
business!



ASSURE



- ▣ Always have staff ask for identification from all delivery people.

ASSURE

- ▣ A good security measure is to control unauthorized access to your facility. It is advantageous to have a check point for all deliveries.



ASSURE

- Keep outside areas well lit at night to dissuade unlawful activity. These areas are also a good location for security cameras.



ASSURE

At a Children's Camp the following can apply:

- ❑ At a Day Camp keep children's lunches/snacks in a secure location
- ❑ Restrict access to select staff
- ❑ Ensure employees wear ID badges, uniforms, or both.
- ❑ Only accept deliveries from reputable/know suppliers and check ID
- ❑ Meet delivery personnel or know what ID will be provide prior to every Camp Season

LOOK

Check on the security of foods and ingredients in the facility by:

- ▣ Monitoring what comes in and keeping track of them.
- ▣ Storing all products securely and examining their ingredients.
- ▣ Store Chemical and Cleaning products separate from food, safely, and properly
- ▣ Adequately protecting the facility's water supply.
- ▣ Prepping food in secured locations.
- ▣ Consistently monitoring buffet tables or salad bars.

LOOK

- ❑ Store foods securely. Do not leave deliveries in unattended areas of your establishment.



LOOK

- ▣ Do you see a problem with this?



LOOK

- ▣ This is a good example of how to store food and non-food items separately and in secure locations. Note that the lock is not latched!



LOOK



LOOK

- ▣ Always be on the **LOOK** out to ensure that no products are left unattended, unsecured, and vulnerable to unknown persons.



LOOK

- ▣ Foods that require a thorough rinsing, such as produce, must be washed under a potable water source. Keep access to your water supply restricted.



LOOK



Know & Protect your water supply!

LOOK



- ❑ Keep ice machines out of areas such as hallways that can be easily accessed by outsiders. A latch and lock can be installed on machines that are accessible.

LOOK

- ❑ Do not conduct food prep in areas where general access can occur such as hallways and dining areas.



LOOK

- ❑ Self service areas, which are considered high risk areas, should be monitored at all times.
- ❑ You can monitor your buffet, food prep and food delivery areas with security cameras



LOOK

- ▣ Locate salad bars or buffet tables in areas of high visibility but away from constant traffic.



LOOK



LOOK

- ▣ Minimize the quantity of food on display.



LOOK

- ▣ In areas not under constant surveillance prepackaged condiments can be used instead of easily opened servers such as ketchup bottles, sugar servers or milk pitchers.



LOOK

- ❑ Bread in an open basket is considered served food and even if returned seemingly untouched must be discarded.



LOOK

At a Children's Camp the following can apply:

- ▣ Monitor where children's lunches are stored, delivery areas, food prep areas, with security cameras or regular inspections.
- ▣ Train Staff to look out for people who are not wearing camp ID.
- ▣ Train staff to detect and report signs of food tampering.

EMPLOYEES

Know your employees and the people coming in and out of your facility. Using the following can help:

- ▣ Employment application.
- ▣ Perform criminal background checks prior to hiring.
- ▣ Train all employees in Food Defense.
- ▣ Implement an employee sick leave policy.

EMPLOYEES

- ▣ Employees should know who is permitted on the premises and who is not, such as terminated employees.
- ▣ Keeping trained experienced employees is a good practice in food security strategies.
- ▣ Establish a system of positive identification and recognition that is appropriate to your workforce such as name tags, photo ID badges, or issue uniforms.

EMPLOYEES

- ▣ Limit employee access.
- ▣ Limit access to the facility by staff so they can enter only during appropriate work hours. Key-cards, keyed or cipher locks could be used.
- ▣ Consider having a two employee rule during food prep and do not leave anyone alone in the kitchen.
- ▣ Ensure employees store personal items in lockers.
- ▣ Use surveillance equipment.

EMPLOYEES

- ▣ Restrict what personal items employees can bring to the facility such as lunch containers or large pocket books. Make sure they are kept in the employee locker while he or she is at work.



EMPLOYEES

At a Children's Camp the following can apply:

- ❑ Establish a system of positive identification and recognition that is appropriate to your camp such as name tags, tee shirts, or photo ID badges.
- ❑ Ensure counselors store personal items in one location.
- ❑ Perform criminal background checks prior to hiring.
- ❑ Have a two counselor rule at all times and do not leave anyone alone in the kitchen or with the campers food.
- ❑ Do not allow camper access to food storage or preparation areas unattended.
- ❑ Train all employees during counselor orientation in your camp's Food Defense policies and procedures.

REPORTS

Inspection review reports regarding the effectiveness of your Food Defense Management Program.

- ❑ Perform a Food Defense self assessment.
- ❑ Perform random inspections and document your results.
- ❑ Evaluate your findings as necessary and make changes when required.
- ❑ FDA final rule implementing Section 306 of the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 requires the establishment and maintenance of records.

“The requirement to establish and maintain records is one of several tools that will help improve FDA's ability to respond to, and further contain, threats of serious adverse health consequences or death to humans or animals from accidental or deliberate contamination of food.” -www.fda.gov

REPORTS

- ▣ Track deliveries and products. Keep a record of all provisions on hand at your facility.



REPORTS

Food Defense Self-Assessment Checklist

Instructions: Use this checklist to perform a food defense assessment of your facility. After answering "Yes" or "No" to each of the questions, refer to the *Food Defense Strategies* brochure for information on how to improve food safety and security at your facility.

Facility Security

Use these questions to evaluate your facility's security. Refer to pages 4-5.

	Yes	No	Action to take
Does management do a daily walk-through inspection of the operation?			
Is the area around the facility well lighted?			
Is the facility locked and secured when closed?			
Are exterior doors (other than customer entryways) locked at all times?			
Is access to exterior door and storage area keys restricted to management staff?			

Facility Employees

Evaluate your personnel/ access practices by answering these questions. Refer to pages 6-7.

	Yes	No	Action to take
Are new employees' work references, addresses, phone numbers, and information on criminal record and immigration status verified?			
Is management alert for unusual employee behavior, i.e. workers staying after shift, arriving unusually early, accessing areas outside their responsibility, etc.?			
Have employees been trained in security procedures?			
Have staff been instructed to report unusual activities in the facility or on grounds?			
Is employee access restricted to those areas in the facility necessary to their job functions?			
Are customers restricted from entering food storage and preparation areas?			
Are cleaning crews, contractors or other non-facility personnel supervised while in food storage and preparation areas?			
Are employee personal items restricted to non-food handling areas?			

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Receiving Supplies

Examination of your products and ingredients can prevent you from serving a problem to your customers. Refer to pages 8-9

	Yes	No	Action to take
Are foods purchased only from reputable vendors?			
Are deliveries received only while staff is present?			
Is the delivery person escorted while in the food storage and preparation areas?			
Are deliveries inspected for damage, tampering or counterfeiting before acceptance?			
Are delivery items matched against order invoices before acceptance/use?			
Once received, are foods immediately moved to a secure food storage area?			

Food Preparation/ Holding/ Customer Service

How food is prepared and held in an establishment has great impact on the end result, both in quality and safety. Refer to pages 10-13.

	Yes	No	Action to take
Are standard operating procedures in place that outline the steps in each job?			
Is each ingredient and its packaging inspected for evidence of tampering before use?			
Are employees trained not to use any food with an unusual look or smell?			
Are thermometers routinely used to measure food temperatures during preparation and holding?			
Are foods thoroughly cooked to required temperatures? (Refer to applicable Food Code)			
Are cold foods kept below 41°F/5°C?			
Are hot foods kept above 135°F/57°C?			
Is a "no bare hand contact" policy (use of gloves or tongs) in effect and enforced with ready-to-eat items?			
Are self-service stations, like salad bars and buffets, in locations that are visible to employees at all times?			
Are empty food containers removed and replaced by new ones to replenish food at salad bars and buffets?			

Cleaning

Your cleaning and sanitizing practices help prevent contamination of your food. Refer to pages 14-15.

	Yes	No	Action to take
Are cleaning and sanitizing chemicals used according to manufacturers' recommendations?			
Is the cleaner concentration or water temperature for dish-sanitizing routinely checked?			

REPORTS

At a Children's Camp the following can apply:

- ▣ Perform a Food Defense self assessment of your camp.
- ▣ Perform random inspections and document your results.
- ▣ Keep a log of all deliveries and provisions stored at camp.
- ▣ Evaluate your findings as necessary and make changes when required.

THREAT

What do you do, and who do you notify, if you have or suspect a threat at your establishment?

- ❑ Because this is a criminal activity, local police or State Police must be contacted immediately.
- ❑ If illness has occurred, the local Health Department must be contacted.
- ❑ Employees should be trained as to what needs to be done in the event they suspect deliberate contamination has occurred.

PLEASE POST THIS NOTICE IN A VISIBLE LOCATION IN THE KITCHEN

IF YOU SUSPECT FOOD HAS BEEN INTENTIONALLY CONTAMINATED

Notify Owner/Manager _____

Name and phone

Isolate area around suspected food from staff and customers (e.g. close doors, tape/seal off area, remove people from area)

Do not disturb food.

Call 911 in a life-threatening situation, if people are showing illness, suspect is threatening others, or staff and/or customers are in a life-threatening situation.

Call Police ___(phone number here)_____, for non-life threatening intentional food contamination incidents.

Call the Health Department _____ if contaminated food may have _____ been served to people.

THE ADDRESS AND CROSS STREETS OF THIS RESTAURANT:

Address: _____

Cross Streets: _____

HOW TO REPORT AN EMERGENCY:

SPEAK SLOWLY AND CLEARLY

DESCRIBE THE EMERGENCY:

What happened?

Where did it happen?

Who was involved?

STATE YOUR NAME

STAY ON THE PHONE

T HREAT

- ▣ Make sure you and your employees know how to handle the suspect product and keep it separate from other foods.
- ▣ Call 911

- ▣ DANGER
- ▣ **CONTAMINATED FOOD**
- ▣ **DO NOT ENTER!**
- ▣ THIS AREA CONTAINS POTENTIALLY HAZARDOUS OR TOXIC FOODS
- ▣ Post where necessary

T HREAT

At a Children's Camp the following can apply:

- ▣ Because this is a criminal activity, local police or State Police must be contacted immediately.
- ▣ If illness has occurred the local Health Department must be contacted within 24 hours.
- ▣ All camp staff should be trained as to what needs to be done in the event they suspect deliberate contamination has occurred.

What We Have Learned

- ▣ To appreciate that any establishment may be subject to a deliberate attack
- ▣ To understand the FDA “**ALERT**” initiative
Assure, Look, Employees, Reports, Threat
- ▣ Some simple procedures you can put in place at your own establishment to better protect you, your staff, and your customers from deliberate food contamination

Monitoring, Cameras, lighting, ID badges, background checks, limiting access, product inventory, having a plan!

REFERENCES/CREDITS

- ▣ FDA
- ▣ NYS Department of Health
- ▣ NRAEF Serve Safe
- ▣ Multnomah County Health Department, OR
- ▣ President's Council of Advisors on Science and Technology, *The Science and Technology of Combating Terrorism, July 2003, p. 5.*
- ▣ The Department of Homeland Security's Role in Food Defense and Critical Infrastructure Protection, February 2007
- ▣ Peter DeLucia, MPA, Assistant Commissioner, Bureau of Public Health Protection, Westchester County Department of Health
- ▣ Frank Guido, MPA, Former Assistant Commissioner, Bureau of Public Health Protection, Westchester County Department of Health
- ▣ James Perucci, Former Principal Sanitarian, Bureau of Public Health Protection, Westchester County Department of Health