



Virginia's Food Security Guide



**For Industry:
Food Producers, Processors,
Transporters, and Retailers**

*This booklet is
being provided as part of the
Secure Virginia Initiative.*

As a result of the terrorist attacks on September 11, 2001, the security of our entire nation has been questioned, including our food supply. The threat of terrorism on Virginia's food supply is very real, and therefore, it is important that the Virginia Food Industry take measures to ensure, not only a safe, but also a secure food supply. Food terrorism could occur as a biological, chemical, physical, or radiological attack. We encourage the food industry to review their current procedures and incorporate appropriate food security measures in an attempt to minimize the risk of intentional threats, contamination, or product tampering. Our goal is to provide Virginia's food industry with the knowledge and information that may prove useful in protecting their facilities and products against terrorism. Sound security practices are needed to minimize this threat to public safety and the food supply.

Assess your entire facility, interior and exterior, for potential points of sabotage of bulk ingredients, your production system, and finished products. Would it be easy for a disgruntled employee, copycat tamperer or terrorist to obtain contaminants and potentially add them to your production system?

Management of Food Security

It's a good idea to assign the responsibility of food security to a qualified team of individuals. One of the first steps this team should take



is to establish contact with the local law enforcement offices, so that in the event of an emergency or disaster, you will know whom to contact. All information regarding suspicious activity should be investigated immediately. Management should be instructed to provide an appropriate level of supervision to all employees, including cleaning and maintenance work-

ers, contract workers, data entry and computer staff, and especially new employees. Encourage staff to be alert and report any signs of tampering with the product or equipment or other unusual situations or areas that may be vulnerable to tampering to a designated person or persons within

management. In addition, you may also want to conduct daily security checks of the premises for signs of tampering or other unusual situations.

Physical Facility

Visitors — Do you limit or restrict entry to your establishment to only essential persons or restrict access to food handling and storage areas, locker rooms, and outside entry into your establishment? You may want to, especially for non-employees. It's a good idea to have all visitors, including deliverymen, outside repair and maintenance workers, plant visitors, supplier representatives, couriers, third-party auditors, regulators, etc. show identification, sign in, and wear visitor passes. It would be beneficial to verify that outside repair and maintenance visitors actually work for the company you hired. This visitor roster should be maintained for 6-12 months. In addition, you may want to consider inspecting incoming and outgoing vehicles for suspicious, inappropriate, or unusual items or activity.

Physical Security — Is the perimeter to your facility protected with fencing or another appropriate deterrent? In addition, you may want to consider security patrols and/or video surveillance. Have you minimized the number of entrances to restricted areas, in accordance with federal, state, or local fire safety codes? Be sure to account for any and all keys to your establishment.

Does your facility have dark or shady areas around points of entry, or are there overgrown shrubs near your building? These provide a opportune hiding place for people with adverse intentions and their supplies. Adequate interior and exterior lighting, including emergency lighting, should be provided. As well, places that could be used to hide intentional contaminants should be minimized. This means keeping grass cut short and shrubbery to a minimum.

Laboratory Security — If you have a laboratory in your facility, keep an up-to-date inventory of all hazardous chemicals and solvents and keep them locked up. In addition, any pathogen cultures should be locked up, and it may also be a good idea to restrict access to the lab and keep it locked when it is not occupied.



Employees

Pre-hiring Screening — When you hire a new employee, do you screen your applicants, check their immigration status when appropriate, or perform criminal background checks? If not, you could be compromising the food security of your establishment. It is advisable to apply these procedures to all employees to the extent possible. Remember to include seasonal, temporary, contract, and volunteer employees too. Should you have questions about the authenticity of the paperwork of an immigrant worker, you may contact the VDACS Office of Dairy and Foods, Food Security Program at 804/786-2035 for further information.



Training in Food Security Procedures — You should provide food security training to all new employees, including information on how to prevent, detect, and respond to tampering and criminal or terrorist activity. It is important to provide periodic reminders of the importance of security procedures as well. Because confidence in your company/brand name could be directly affected by a terrorist threat or incident, ensure that employees buy in to your food security goals. Try to involve employees in food security planning and demonstrate the importance of security procedures by incorporating them into your employees' job descriptions.

Restricted Access, Daily Work Assignments, and Unusual Behavior — Establish a system of positive identification and recognition (i.e.: issuing photo identification badges color coded by area of authorized access). You may want to consider limiting employee access to only those areas necessary for their job function. It is important to know who is and who should be on the premises and where they are located, being specific to work shift. You will want to keep this information up to date and reassess access levels of all employees periodically. Be watchful for unusual behavior by new employees or workers, such as staying unusually late after the end of their shift, arriving unusually early, asking questions on sensitive subjects, or bringing cameras to work. One last thing to keep in mind

is having lock combinations changed and/or old key cards collected when an employee is voluntarily or involuntarily terminated.

Personal Items — Restrict personal items, such as carry bags, extra clothing, purses, etc. allowed in your establishment or try to prevent workers from bringing these items into food processing areas.

Raw Materials and Packaging

Try to ensure that your suppliers and transporters also practice appropriate food security and employee screening measures. Do you use only known, appropriately licensed or permitted sources for all ingredients, compressed gas, packaging, and labels? Obtain contracts or letters of credit from your suppliers. Have someone supervise off-loading of incoming ingredients. You may want to consider inspecting incoming ingredients and return products for signs of tampering or counterfeiting (inappropriate product identity, labeling, product code or specifications), if you do not already do so. Also consider developing accountability for all restricted ingredients, such as nitrites and for food allergens, such as dairy products, wheat, soy, peanuts, tree nuts, eggs, shellfish, and fin fish. Investigate missing or extra stock or other irregularities outside of a pre-determined normal range of variability.

Think about your bulk delivery systems. Are outer connections for liquid sugar, corn syrup, flour, etc. enclosed and locked at all times? Are such items stored in a non-secure or non-supervised area?

Operations

Security of Water — Is your water supply system secure with locks on wellheads, pump houses, water storage tanks, etc.? Do you have backflow preventative measures in place on your water systems? It would be advantageous to regularly test your water to ensure that it meets appropriate potability standards. Try to include random checks, and be alert to changes in the profile results. If you are on a public water supply, you should maintain contact with your provider so that you may be alerted to any problems that may occur. It may also be beneficial to identify some alternative sources of potable water, should the need arise.



Security of Establishment Air — Routinely examine the physical integrity of air intake points for your facility, and secure access to these points to the extent possible.

Finished Products and Recall Strategy

Do you have a recall plan in place and ready for use? If not, you will need to devise a way to keep track of finished products. Check to see that your record keeping system will allow you to trace both ingredients back and finished products forward for all products produced. You may want to evaluate the utility of finished product testing to detect tampering, criminal, and/or terrorist activity. You should identify customer contacts by addresses and phone numbers in the event of a recall and be able to provide for the proper disposition of the recalled product. Ensure that all food storage warehouses and shipping vehicles are practicing appropriate security measures, and consider performing random inspections of these facilities/vehicles. Lastly, if you have foods that are served in an open display area (i.e.: salad bars, open bulk containers), monitor these areas closely.

Security Strategies

Response to Tampering and Criminal or Terrorist Events — Do you have an emergency or security plan in place? Do you review, update, and exercise these procedures regularly? It is important to plan for an emergency evacuation and to include measures to prevent security breaches during such an evacuation. Identify and post 24-hour contact information for internal and external communication in case of an emergency. Identify what triggers the notification, who should be notified, and in what order they are to be notified. Include when to contact management, local, state, and federal law enforcement, fire, rescue, and regulatory or government agencies. Be sure to designate who will be responsible for contacting the above representatives.

Additional Steps — Finally, you should become familiar with the emergency response system and the Emergency Command Center operations in your area. This information can be obtained from the Emergency Response Coordinator for your local government. Make employees aware of company contacts and where they can be reached in the event of potential security problems. It's also a good idea to maintain any floor or flow plan of your facility in a secure, off-site location.

Evaluating Your Security Plan

Evaluate the effectiveness of your food security plan by reviewing and testing your strategies at least annually (i.e.: conducting mock criminal, terrorist, or tampering events and mock recalls). Perform random and routine food security inspections of your entire process flow from receiving of ingredients and raw materials through distribution of your finished products. You may want to consider having a third party or in-house security expert also review and test the effectiveness of your food security plan.

If you would like additional guidance materials on food security, please visit our web site at www.vdacs.state.va.us/foodsafety/bioterrorism.html Should you have further questions, please contact the Virginia Department of Agriculture and Consumer Services, Office of Dairy and Foods, Food Security Program at 804/786-2035.



*VIRGINIA DEPARTMENT
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**Office of Dairy and Foods
Food Security Program**

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