Part 7 – Preventive Food Defense Procedures

• Secure Employee/Visitor Procedures (60 pts.)
• Secure Facility Procedures (120 pts.)
• 180 Total Points Possible
7-1 Preventative Food Defense Procedures

Areas where strategies should be developed to reduce risks and a person is designated to oversee it. These areas include:

- Visitor protocols
- Building security
- Employee hiring
- Product security and integrity
- Visual vigilance
- FDA Registration

5 Points Document: Food Safety Program
7-2 Preventive Food Defense Procedures

A food defense training has been provided to all employees.

Some specific suggestions include:

- Develop a SOP for employee hiring
- Provide a badge system for employee identification

5 Points Document: Food Safety Program & Worker Training Log
7-3 Preventive Food Defense Procedures

Employees are aware of whom in management they should contact about potential security problems/issues.

Manage building security by:
• Lock all buildings when not in use
• Secure all agricultural chemicals and verify inventory on a scheduled basis.
• Restrict access to keys
• Use fencing, cameras, and surveillance, as necessary

5 Points
7-4 Preventive Food Defense Procedures

Visitors are required to check in and out, when entering/leaving the facility.

This strategy might include:

- A central check-in location for visitors
- Maintaining a visitor’s log
- Accompanying all visitors at all times
- Posting signs directing visitors to appropriate locations

5 Points Document: Visitor Sign in Sheet
7-5 Preventive Food Defense Procedures

The purpose for the visitation to site is verified before granting admittance.

5 Points Document: Visitor Sign in Sheet
7-6 Preventive Food Defense Procedures

Accompanying all visitors at all times. Visitors are prohibited from the packing/storage areas unless accompanied by an employee.
7-7 Preventive Food Defense Procedures

Employee and visitor vehicles, to and from the site are subject to inspection.

5 Points Document: Visitor Sign in Sheet
7-8 Preventive Food Defense Procedures

Parked vehicles display a decal or placard issued by the facility

5 Points
7-9 Preventive Food Defense Procedures

Staff is prohibited from bringing personal items into the handling or storage areas.

5 Points
Control access to your product.
Limit access to product storage areas to only those individuals who require access to do their jobs.

5 Points
7-11 Preventive Food Defense Procedures

Management is aware of employees on the premises, and the area they are assigned to

5 Points
7-12 Preventive Food Defense Procedures

A system of positive identification of employees has been established and is enforced

5 Points
7-13 Preventive Food Defense Procedures

Uniforms, name tags, or identification badges are collected from employees prior to the termination of employment

5 Points
7-14 Preventive Food Defense Procedures

The mailroom is located away from the packing/storage facilities

5 Points
7-15 Preventive Food Defense Procedures

Computer access is restricted to specific personnel

5 Points
7-16 Preventive Food Defense Procedures

A system of traceability of computer transactions has been established
A minimum level of background checks established for all employees

5 Points
7-18 Preventive Food Defense Procedures

Routine security checks of the premises are performed for signs of tampering, criminal or terrorist action.

5 Points Document: Secure Facility Procedures
Perimeter of facility is secured by fencing or other deterrent

5 Points
Checklists are used to verify the security of doors and windows.

5 Points Document: Secure Facility Procedure
7-21 Preventive Food Defense Procedures

All keys to the establishment are accounted for

5 Points Document: Secure Facility Procedure
7-22 Preventive Food Defense Procedures

The facility has an emergency lighting system

5 Points
7-23 Preventive Food Defense Procedures

The facility is enclosed

5 Points
7-24 Preventive Food Defense Procedures

Storage or vehicles/containers/trailers/railcars that are not being used are kept locked

5 Points
7-25 Preventive Food Defense Procedures

Delivery schedules have been established

5 Points
7-26 Preventive Food Defense Procedures

The off-loading of incoming materials is supervised

5 Points
7-27 Preventive Food Defense Procedures

The organization has an established policy for rejecting deliveries

5 Points Document: Secure Facility Procedure
7-28 Preventive Food Defense Procedures

Unauthorized deliveries are not accepted

5 Points Document: Secure Facility Procedure
7-29 Preventive Food Defense Procedures

The company does not accept returned (empty) containers for packing of product unless they are sanitized containers intended for reuse.

5 Points Document: Secure Facility Procedure
Inspect product returned to the facility for tampering

5 Points Document: Secure Facility Procedure
7-31 Preventive Food Defense Procedures

The company has identified the individual(s) with at least one backup, who are responsible for recalling the product.

5 Points Document: Secure Facility Procedure
The operation has performed a “mock recall” that was proven to be effective.

5 Points Document: Secure Facility Procedure
7-33 Preventive Food Defense Procedures

Product imported from outside the US is segregated from domestic product

5 Points Document: Traceability Program
If allergens are handled by the facility, they are segregated from products to avoid cross contamination. Peanuts are a good example of this.
7-35 Preventive Food Defense Procedures

Floor plans, product flow plans, and/or segregation charts are available

5 Points Document: Secure Facility Procedure
7-36 Preventive Food Defense Procedures

The organization has registered with the FDA

5 Points Document: Secure Facility Procedure