

UNITED STATES DEPARTMENT OF AGRICULTURE  
FOOD SAFETY AND INSPECTION SERVICE  
WASHINGTON, DC

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<b>FSIS NOTICE</b>	45-12	7/5/12
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**SEVENTH FOOD DEFENSE PLAN SURVEY**

**I. PURPOSE**

This notice announces the upcoming annual food defense plan survey, the seventh in a series, which will begin on July 16, 2012, and will close on August 10, 2012. The survey will gather data about industry's voluntary adoption of food defense plans.

**II. BACKGROUND**

A. Food defense plans are voluntary (i.e., not mandated by regulation); however, FSIS considers such plans to be an important tool that can reduce the risk of intentional adulteration of food products. The questions in the food defense plan survey are intended to determine whether an establishment has a food defense plan, and, if so, whether the plan is functional (i.e., the measures in the plan have been implemented and tested periodically, and the plan is reviewed at least annually).

B. Previous surveys were conducted in August 2006, November 2007, August 2008, December 2009, August 2010, and July 2011. This survey will include the same types of establishments as in 2011: official meat and poultry slaughter and processing establishments, processed egg product plants, and official import inspection establishments.

C. The initial food defense survey in 2006 determined that 27% of surveyed establishments had a functional food defense plan. By July 2011, this adoption rate had increased to 75%. While this represents a significant increase from prior years, FSIS has established an Agency performance goal for 2016 to have at least 90% of all establishments with a functional plan.

D. Once the results of this seventh survey are compiled, the Agency will use them to guide its outreach efforts and its consideration of whether to undertake rulemaking to require adoption and implementation of food defense plans.

**III. THE FOOD DEFENSE PLAN SURVEY**

A. The food defense plan survey is to be completed as early as possible in July so that any questions can be resolved before the closing date of August 10, 2012.

B. The survey consists of four questions that require only Yes or No answers. The four questions in the survey are:

1. Does the official meat or poultry establishment, processed egg product plant, or official import inspection establishment have a written food defense plan?

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**OPI:** OPPD

2. Does the official meat or poultry establishment, processed egg product plant, or official import inspection establishment have measures in place that address: 1) outside security (e.g., door locks), 2) inside security (e.g., emergency lighting is in place); 3) personnel security (e.g., method to identify employees in the establishment); and 4) incident response security (e.g., reporting unusual activities is encouraged)?
3. Has the official meat or poultry establishment, processed egg product plant, or official import inspection establishment reviewed its food defense plan in the past year?
4. Has the official meat or poultry establishment, processed egg product plant, or official import inspection establishment, tested its food defense plan in the past year? (This can be as simple as testing locks on doors and conducting a periodic perimeter search.)

C. For this survey, FSIS will rely on Inspection Program Personnel (IPP) and import inspection personnel to ask these questions of establishments. IPP and import inspection personnel are to review the above questions with the official meat or poultry establishment, processed egg product plant, or official import inspection establishment management during a regular weekly meeting prior to completing the survey (References: FSIS Directive 5000.1 and 5010.1, and FSIS Notice 33-12).

D. If the official meat or poultry establishment, processed egg product plant, or official import inspection establishment does not have a written food defense plan, IPP and import inspection personnel are to inform the establishment that FSIS has developed a General Food Defense Plan that can be adopted by reviewing and signing the plan. The General Food Defense Plan is available in English, traditional Mandarin Chinese, Vietnamese, Korean, and Spanish. If the official meat or poultry establishment, processed egg product plant, or official import inspection establishment needs a copy of the General Food Defense Plan, IPP and import inspection personnel are to provide their name and address to Sally Fernandez, Office of Outreach, Employee Education and Training, by e-mail at [Sally.Fernandez@fsis.usda.gov](mailto:Sally.Fernandez@fsis.usda.gov), and another plan will be mailed. Alternatively, a copy of the General Food Defense Plan can be immediately downloaded from the FSIS Web site at [www.fsis.usda.gov/Food\\_Defense\\_&\\_Emergency\\_Response/index.asp](http://www.fsis.usda.gov/Food_Defense_&_Emergency_Response/index.asp).

E. Official meat or poultry establishments, processed egg product plants, and official import inspection establishments that have food defense plans are not required to provide a copy of the plan to FSIS. If official meat or poultry establishments, processed egg product plants, or official import inspection establishments do chose to share the plan, IPP and import inspection personnel are only to use the plan to help them readily identify how the establishment is addressing food defense. IPP and import inspection personnel are not to show or share the plan with any outside source because it may contain sensitive information. If the establishment chooses to share a copy of their food defense plan, IPP and import inspection personnel are to document that a copy of the plan was shared in the weekly meeting memorandum, as described in FSIS Directive 5000.1 and 5010.1, and FSIS Notice 33-12.

#### **IV. INSTRUCTIONS FOR COMPLETING THE SURVEY—MEAT AND POULTRY SLAUGHTER AND PROCESSING ESTABLISHMENTS AND OFFICIAL IMPORT INSPECTION ESTABLISHMENTS**

A. Between July 16 and August 10, 2012, IPP and import inspection personnel at all official meat and poultry establishments and official import inspection establishments will receive an alert in PHIS to complete the food defense survey task.

B. The instructions for IPP and import inspection personnel to complete the survey are provided below.

1. Look for the task “2012 Food Defense Survey” on the task list and schedule it on the task calendar.
2. Select the “Qnaire” tab for access to the questionnaire.
3. Record the answers to the survey questions in the task results page of PHIS.
4. Select the first question, record the answer, click save, and proceed to the next question. If the answer to the first question is NO, the survey will end because questions 2, 3, and 4 are not applicable.
5. Record the task as completed once the survey results have been entered.

C. IPP at official meat and poultry slaughter and processing establishments and import inspection personnel are to complete the food defense plan survey in lieu of performing one Food Defense Verification Procedure (pursuant to FSIS Directives 5420.1 and 5420.4). IPP are to mark the Food Defense Verification Procedure as not performed and select the justification “Higher priority task took precedent.”

## **V. INSTRUCTIONS FOR COMPLETING THE SURVEY—PROCESSED EGG PRODUCTS PLANTS**

A. Between July 1 and July 31, 2012, IPP at processed egg product plants will receive an Outlook e-mail with instructions for completing the food defense plan survey. IPP will receive separate e-mails for each plant to which they are assigned.

B. The instructions for IPP to complete the survey are provided below.

1. Click on the survey link in the Outlook e-mail to begin the survey.
2. Select the first question, record the answer, click save, and proceed to the next question. If the answer to the first question is NO, the survey will end because questions 2, 3, and 4 are not applicable.

C. IPP at processed egg products plants are to complete the food defense plan survey in lieu of performing one Food Defense Verification Procedure (pursuant to Directives 5420.1 and 5420.4). IPP are to record a “U” for the procedure that was not performed.

## **VI. DATA ANALYSIS**

Upon the receipt of food defense plan surveys, the Office of Data Integration and Food Defense (ODIFP) will analyze Food Defense Plan survey results to determine adoption rates for functional food defense plans, as defined in Section II A of this notice. Adoption rates will be evaluated by establishment size, as well as by other establishment attributes. FSIS will use these analyses to assess the progress towards achieving the Agency’s performance standard for the percent of establishments with functional food defense plans, as described in the FSIS Strategic Plan for 2011 – 2016 and the USDA Strategic Plan for 2010 – 2015. Results from this analysis will be shared within FSIS and with the regulated industry and other key stakeholders.

Refer questions regarding this notice to the Policy Development Division through askFSIS at <http://askfsis.custhelp.com> or by telephone at 1-800-233-3935. When submitting a question via askFSIS, use the Submit a Question tab, and enter the following information in the fields provided:

Subject Field: Enter **Seventh Food Defense Plan Survey**

Question Field: Enter your question with as much detail as possible.

Product Field: Select **General Inspection Policy** from the drop-down menu.

Category Field: Select **Food Defense** from the drop-down menu.

Policy Arena: Select **Domestic (U.S.) Only** from the drop-down menu.

When all fields are complete, press the **Submit** button.

A handwritten signature in black ink that reads "Rachel A. Edelstein". The signature is written in a cursive style with a large initial 'R'.

Acting Assistant Administrator  
Office of Policy and Program Development