

After Action Report

Operation Wild Rose

FSIS-State Food Defense Partnership Exercise

October 30, 2008

Food Safety and Inspection Service

**Final Report
December 1, 2008**

Background

The U.S. Department of Agriculture (USDA) is actively addressing the need to maintain the safety and defense of the country's food supply. During a crisis, it is critical that the Department be able to efficiently and effectively coordinate with its counterparts at the state and local level, as well as within other federal agencies and the private sector. On October 30, 2008, USDA's Food Safety and Inspection Service (FSIS) conducted a tabletop exercise, "Operation Wild Rose", in Des Moines, IA and at FSIS headquarters in Washington, DC. The exercise focused on the roles of federal, state, and local government agencies and the food industry to work together to detect, respond to, and recover from a significant incident activity. Emphasis was placed on a team approach to incident response, coordination, integration of capabilities, problem identification, and resolution through preparation, response, recovery, and multi-agency coordination. The exercise offered FSIS the opportunity to test and validate operating guidelines and directives for responding to a significant incident activity involving the intentional adulteration of food products within an FSIS inspected facility. The ultimate goals were:

- Minimizing suffering, loss of life, and personal injury;
- Minimizing damage to property; and
- Minimizing disaster- or emergency-related service disruption, which would have an adverse impact on the government, the communities, and the businesses and their employees, reputation, and product brand names.

This report identifies areas of strengths and weaknesses that were observed during the exercise and offers recommendations for improvement.

Objectives

Operation Wild Rose focused on enhancing the coordination and communication between FSIS, other regional federal agencies, state and local government agencies, and industry stakeholders. The objectives for the exercise were to clarify roles and responsibilities and improve coordination and communication among:

- FSIS Program Offices and associated field staffs;
- state and local public health and emergency response agencies;
- primary Federal emergency response organizations;
- private sector stakeholders in the food industry; and
- academic community.

Strengths of the Exercise – What Worked Well?

The exercise involved participation by the following stakeholder groups:

- FSIS field and Headquarters personnel from OFO, OPEER, OPHS, OIA, OM, OPPD, OPACE and OFDER;
- staff from DHS, FBI, APHIS, EPA and the USDA Office of Inspector General;
- State of Iowa government agencies, including the Iowa Department of Public Health; Iowa Homeland Security; Iowa Department of Public Safety; Iowa Department of Agriculture and Land Stewardship, Meat and Poultry Inspection Bureau; Iowa Homeland Security and Emergency Management Division; Iowa Department of Inspection and Appeals;
- local stakeholders, including Blackhawk County Iowa Environmental Health Association, Des Moines Police Department, Polk County Health Department, Polk County Emergency Management;
- food industry, including Sara Lee Corporation, Sparboe Companies, Daybreak Foods Inc., Greater Omaha Packing, West Liberty Foods, Safeguard Iowa Partnership; and
- Iowa State University, Center for Industrial Research and Service; and University of Iowa Hygienic Lab.

Participants were actively engaged in the exercise. There was open dialogue and networking among stakeholder groups.

A number of government agency participants commented on the value of the strong private sector participation in this exercise.

Areas for Improvement – What Did Not Work Well in the Exercise?

Exercise Structure

Participant comments about the exercise structure included:

- A simulated Emergency Operations Center (EOC) and Public Information Officer (PIO)/Joint Information Center (JIC) were needed to move participants toward operations in line with the National Response Framework Incident Command/Unified Command System. An EOC was discussed but not played out for this exercise.
- The first phase of the scenario was too long – suggest one hour maximum.
- Law enforcement participation in the exercise scenario was out of sequence. For example, Phase 4 questions in the Situation Manual would likely be addressed and time-relevant much earlier in a real incident.
- More stakeholders were needed from local government agencies, particularly public health departments, hospitals, HAZMAT, environmental agencies
- More USEPA and state environmental representatives were needed for Phase 4 of the scenario.

- Given the concern about employee exposures, several industry participants suggested that a representative from the Occupational Safety and Health Administration (OSHA) be invited to participate in the exercise.

Communication/Coordination

- Communication reminders – these were confusing to a number of participants because they gave the impression that the messages were created and controlled at the federal level with little or no input from the state or local level. Other participants commented that although the information content was good, the presentation of the communication reminders interrupted the flow of the exercise. May be better as a PowerPoint presentation prior to the exercise.
- Include PIOs from participating agencies
- Communications should go through JIC at the state level
- If the EOC (Unified Command) had been played out, some communication issues may have been prevented or avoided
- Communication from government agencies to industry was limited and confusing; there was a general sense that government was not working as well with industry as possible.

Incident Command System (ICS) Issues

What triggered each stakeholder group to organize into or participate in a multi-agency incident command structure?

- Local – illnesses
- State of Iowa – large number of illnesses and deaths triggered participation in ICS
- FSIS – notification of incident from industry
- Industry – industry was not aware of an ICS structure
- Other Federal Agencies – criminal investigation

What was the effectiveness of the ICS structure for this exercise?

- Local – effective in resolving issues and communicating
- State of Iowa – ICS structure was very effective for communication of information
- FSIS – effective
- Industry – not aware of an ICS structure
- Other Federal Agencies – effective

Who was in charge?

- Local – local public health and law enforcement
- State of Iowa – public health, then FSIS, then industry.
- FSIS – public health at local and state level, followed by FBI, FSIS and FSIS/EPA
- Industry – FBI was perceived to be in charge
- Other Federal Agencies – FBI for Phases 1-3

Were decisions coordinated among stakeholder groups?

- Local – better coordination is needed with the law enforcement community regarding the concern for confidentiality of public health issues. Patient interview information is important for public health investigations, and the process is likely to be unfavorably impacted by the presence of law enforcement personnel.
- State of Iowa – decisions were coordinated with public health and FSIS; however, communications with industry could have been better coordinated
- FSIS – for the most part; however there was a breakdown in coordination with industry on disposal and decontamination
- Industry – not always involved in communications involving decisions affecting the industry, specifically recovery of contaminated products.
- Other Federal Agencies – certain decisions were (e.g., responses to media inquiries)

Other Observations

A number of exercise participants disagreed with the FBI's assertion that the FBI was in charge of response actions, pointing out that there were two separate investigations – a criminal investigation and a public health investigation.

Several participants also disagreed with the suggestion that law enforcement personnel should be present during interviews conducted by the public health community with ill consumers.

Coordination between the two exercise locations needs to be fine-tuned to maintain fluidity throughout the course of the exercise. Lack of coordination, and communication, has created time management issues.