

After Action Report

Operation Sunflower

FSIS-State Food Defense Partnership Exercise

February 26, 2009

Food Safety and Inspection Service

**Final Report
April 6, 2009**

Background

The U.S. Department of Agriculture (USDA) and the Food Safety and Inspection Service (FSIS) are actively addressing the need to maintain the safety and defense of the country's supply of meat, poultry, and egg products. 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 February 26, 2009, FSIS conducted a tabletop exercise, "Operation Sunflower", in Lawrence, KS and at FSIS headquarters in Washington, DC. The exercise focused on the roles of Federal, state, and local government agencies and the meat, poultry and egg products industry to work together to detect, prepare, respond to, and recover from a significant incident. Emphasis was placed on a team approach to incident response, coordination, integration of capabilities, problem identification, communications, and resolution through preparation, response, recovery, and multi-agency coordination. The exercise provided FSIS the opportunity to test and validate operating guidelines and directives for responding to a significant incident involving the intentional adulteration of meat products within an FSIS regulated facility. The ultimate goals were:

- protecting public health,
- 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 food products.

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

Objectives

Operation Sunflower 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, law enforcement and emergency response agencies;
- primary Federal emergency response organizations; and
- private sector stakeholders in the meat industry.

Strengths of the Exercise – What Worked Well?

The exercise involved participation by the following stakeholder groups:

- FSIS field and Headquarters personnel from the Office of Field Operations; Office of Program Enforcement, Evaluation, and Review; Office of Public Health Science; Office of International Affairs; Office of Management; Office of Policy and Program Development; Office of Public Affairs and Consumer Education; Office of Outreach, Employee Education and Training; and Office of Data Integration and Food Protection;
- staff from the Department of Homeland Security, Federal Bureau of Investigation, USDA’s Office of Inspector General, Animal and Plant Health Inspection Service, and Indian Health Service;
- State of Kansas government agencies, including the Department of Health and Environment, Department of Agriculture, Division of Emergency Management, and Homeland Security;
- local government agencies, including the Lawrence-Douglas County Health Department, Douglas County Emergency Management, Douglas County Sheriff’s Office, and Lawrence Police Department; and
- the food industry, including Sara Lee Corporation, Kansas City Steaks, and Hitchin Post Foods.

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

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

Exercise Structure

Participant comments about the exercise structure included:

- first two phases of the scenario were too fast paced; suggest combining some injects to make it less confusing
- suggest adding times to each inject to provide a “real time” timeline versus the compressed time of the scenario
- provide a few key reference resources or have web accessibility at each stakeholder table
- the Hotwash was very repetitive
- additional information was needed about:

- sample collection – disposition of this issue was not clear, although input provided by FERN lab representative and FBI was appreciated.
- recall effectiveness checks and the roles of public and private sector
- recovery phase issues of disposal, decontamination and financial assistance

Exercise Participants

All of the needed participants were not available for the exercise. In particular, presence of the following groups would have added value:

- federal agencies – FDA, EP
- state agencies – HAZMAT, environmental, bureau of waste management
- industry – retail and restaurant representatives
- consumer group representatives
- Tribal Nation representatives

Better notification/communication prior to the exercise may have helped to identify and encourage participation by representatives of these stakeholder groups.

Several participants suggested making the groups smaller and mixing up the stakeholders to facilitate better communication, improve awareness of other perspectives, and build stronger relationships.

Communication/Coordination

Although there were good interactions among industry and government agency representatives during the exercise, the public and private sectors need more communication prior to an event like that simulated in the exercise. Suggestions included:

- better coordination with industry in the planning stages
- public sector agencies need to help industry better understand ICS and the ESF response system
- private sector needs to help government agencies better understand industry emergency response procedures

Better communication is needed between law enforcement staff and public health protection staff, and with the private sector.

Incident Command System (ICS) Issues

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

- Local government – large number of illnesses;
- State of Kansas – multiple counties with illnesses; calls and requests requiring coordination;
- FSIS – multiple organizations involved in response actions;
- industry – trigger for FSIS and local law enforcement was suspicious activity in establishment

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

- Local government – worked well
- State of Kansas –effective
- FSIS – effective
- industry – limited – unsure where to get answers about sampling and disposal questions

Who was in charge?

- Local government – Local public health department; brought in other agencies during activation of EOC;
- State of Kansas – EOC activated; state responsible for recall actions at state-regulated facilities and for informing the Governor and public
- FSIS – changed by phase; FSIS for product in establishment, and FBI for criminal investigation
- industry –industry in Phase 1 (for notification) and Phase 3 (for recall plan); confusion about local, state or FSIS lead throughout

Were decisions coordinated among stakeholder groups?

- Local government – yes
- State of Kansas – yes
- FSIS – yes
- industry – yes, among government agencies but not with industry

Other Observations

More discussion is needed about how a law enforcement investigation can work successfully and effectively with an ICS structure without impeding an investigation.

Include industry representatives in future ESF coordination meetings.

Some exercise materials (e.g., disposal/decontamination guidance document) should be sent to participants in advance of the exercise.

Industry representatives expressed an interest in better understanding DHS roles and authorities and those of state agencies versus state versus FSIS.

Consider expand exercise to allow for each stakeholder group to share information about the roles and responsibilities of their organization.

Establish a state-industry partnership to improve planning and preparedness.