Food Defense Within FSIS-Regulated Establishments: Are You Prepared?

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If you can relate to any of the statements illustrated below, your establishment may be vulnerable to a food defense incident. Even if these disruptions have not occurred, your plant might still be vulnerable, regardless of your location or the type or volume of product produced.

Food defense is the protection of food products from intentional contamination or adulteration where there is an intent to cause public health harm and/or economic loss. Potential sources of a food defense incident include, but are not limited to, terrorist organizations (foreign or domestic) exploiting vulnerabilities, tampering or counterfeiting of products by disgruntled employees, or someone, such as a competitor, adulterating food products for economic gain.

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The food system in the United States continues to increase in complexity, diversity and reliance upon interconnected domestic and global systems. For these reasons, threats and vulnerabilities posed to the food supply deserve everyone’s attention. Vulnerabilities exist throughout the entire food chain unless addressed by careful planning and subsequent monitoring.

Food defense continues to be a priority for the United States Department of Agriculture’s (USDA) Food Safety and Inspection Service (FSIS). FSIS recommends mitigating food defense vulnerabilities by adopting a functional food defense plan.

A food defense plan is functional if an establishment ensures all four of the following conditions are met:

- **Written/developed** – the plan is documented and signed;
- **Implemented** – preventive measures are implemented to ensure a base level of “common sense” security;
- **Tested** – security measures are monitored; and
- **Reviewed and maintained** – the plan is reviewed at least annually and revised as needed.

FSIS measures the adoption of functional food defense plans within FSIS-regulated establishments by conducting an annual survey. The 2014 survey was conducted in July and August and was completed by Inspection Program Personnel at all meat, poultry, and processed egg product establishments and by Import Inspection Personnel at all import inspection establishments.

Results from the survey showed that 84 percent of establishments responding to the survey have a functional food defense plan. This represents an increase from the 83 percent of establishments with a functional food defense plan in 2013 and an even larger increase since the survey was initiated in 2006.

As shown in Table 1, the food defense plan survey results are also broken down by establishment type and size, with 98 percent of large establishments, 91 percent of small establishments, and 77 percent of very small establishments having a functional food defense plan. In addition, 84 percent of meat and poultry establishments, 93 percent of processed egg product establishments, and 89 percent of import inspection establishments have a functional food defense plan.
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As demonstrated in Table 2, while the percentage of large and small establishments with a functional plan remained the same from 2013, the percentage of very small establishments with a functional plan increased from 75 percent to 77 percent during the same time period. The 2-percent increase is a step in the right direction for very small establishments, but there is still room for improvement.

<table>
<thead>
<tr>
<th>Establishment Size</th>
<th>Meat &amp; Poultry Establishments</th>
<th>Processed Egg Product Plants</th>
<th>Import Inspection Establishments</th>
<th>Overall</th>
</tr>
</thead>
<tbody>
<tr>
<td>Large</td>
<td>98%</td>
<td>90%</td>
<td>N/A</td>
<td>98%</td>
</tr>
<tr>
<td>Small</td>
<td>91%</td>
<td>95%</td>
<td>N/A</td>
<td>91%</td>
</tr>
<tr>
<td>Very Small</td>
<td>77%</td>
<td>58%</td>
<td>N/A</td>
<td>77%</td>
</tr>
<tr>
<td>Total</td>
<td>84%</td>
<td>93%</td>
<td>N/A</td>
<td>84%</td>
</tr>
</tbody>
</table>

As demonstrated in Table 2, while the percentage of large and small establishments with a functional plan remained the same from 2013, the percentage of very small establishments with a functional plan increased from 75 percent to 77 percent during the same time period. The 2-percent increase is a step in the right direction for very small establishments, but there is still room for improvement.

Historically, very small establishments believed they were not vulnerable to food defense incidents because they produce a low volume of product, have few employees, or are located in rural communities. In fact, these reasons may make a very small establishment even more vulnerable as they could be seen as an easier target. Remember, it may only take one incident to cause economic impact and cause the public to lose confidence in the safety of the food supply and, specifically, your product.

Another common misconception of smaller establishments is that it takes a lot of resources to develop a functional food defense plan. In fact, a food defense plan can easily be developed with the help of tools and resources developed by FSIS.

For instance, FSIS’ General Food Defense Plan provides a simple checklist that can help an establishment identify outside, inside, personnel, and incident-response security measures that can be implemented to develop a functional plan.
This plan is available for free online at [www.fsis.usda.gov/fooddefense](http://www.fsis.usda.gov/fooddefense) and was recently updated to allow users to complete the form electronically, which makes maintaining and updating the plan very easy. FSIS’ General Food Defense Plan is also available in Korean, Mandarin, Spanish, and Vietnamese languages.

Even though you may think your establishments is too small to be at risk for a food defense incident, remember that it may only take one person or one small incident to ruin your business or cause harm. Having a functional food defense plan is a simple step you can take to minimize your risk of unknowingly producing unsafe product, experiencing economic loss or theft, or being liable for harm caused by a food defense lapse.

FSIS asks that you do your part to maintain a safe food supply by developing, implementing, testing, and maintaining your food defense plan.

Visit FSIS’ Web site at [www.fsis.usda.gov/fooddefense](http://www.fsis.usda.gov/fooddefense) to find additional tools and resources that can help you create and maintain your food defense program. Also, you can obtain more information or request a hard copy of the General Food Defense Plan and other food defense resources by contacting the Small Plant Help Desk at 1-877-FSISHelp (1-877-374-7435) or email InfoSource@fsis.usda.gov.

The Small Plant Help Desk is available, toll free, Monday through Friday from 8 a.m. to 5 p.m., Eastern Time. After hours, please leave a voice mail and you will receive a follow up call from an FSIS subject-matter expert within 24 hours.