Site Security and Food Defense Discussion

Patrick Nellenbach
Director of Safety & Security
Star of the West Milling Company
Why? Why Do We Spend Time, Effort and Resources on Security

- Provide a Safe and Secure Place of Employment
- To Protect the Consumer
- To Protect Our Brand Integrity
- Expectations of Our Customers
- Compliance With Regulatory Standards
What Type of Tools are We Using?

Security Tool Spectrum

- People
- Procedures
- Physical Barriers
- Access Control Systems
- Cameras
The Absolute Foundation of Any Security Program

Technology is only a facilitator it’s the people operating the equipment that give you the edge

Do You Discuss Security with the staff. Do they own it and communicate improvements needed, what they may have observed, and are consistent with practices
- Keep in mind that Operational Staff will not often take greater Ownership than Supervisors and Management

- Do you include Security measures and elements into your Monthly Inspections, Auditing and Training

- Is there standard Procedures for New Employees and when an Employee Leaves? For granting access to contractors?

- Do you include Security and Food Defense into Emergency Response and Product Recall Exercises?

- Do we document Security Breaches? How About IT?
Access Control Systems

- What type of system do you use? Codes, Key FOBs keys or a combination of the three?

- Are we periodically verifying and auditing whether the access authorities you have given are appropriate

- How do you Facilitate the Movement of People

- How do we Layer our operating areas to increase our control over operating areas?

- Can you promptly restrict access if needed?
Security Cameras

- Do You have A Rationale for your Camera Placement?

- Do you allow Other staff members to view cameras? The Cameras are a Security Instrument but they can be much more.

- Are you transparent as to why cameras are positioned where they are?

- Does someone monitor the effectiveness of the system?
FSMA Rule Roadmap Timeline

Human Food Preventive Controls: Safety Plans, GMPs, Recall Plans - Sept., 2016, 17, 18

Animal Food Preventive Controls: GMPs, Preventive Controls, Recall Plans - Sept., 2016, 17, 18

Sanitary Transport: Design/Maintenance Equipment, Operations- Temp Control, Contamination Prevention, Training, Records April 2017, 18

Foreign Supplier Verification: Verification, Hazard Analysis, Food Risk and Supplier Performance, Corrective Actions May 27, 2017

Food Defense Intentional Adulteration: Food Defense Plan, Vulnerability Assessments, Mitigation Strategies, Monitoring, Training and Recordkeeping July 2019, 20, 21
**Food Defense** – Establishing Controls that reduce the chances of the food supply from becoming Intentionally Contaminated.

**Food Safety** - Addresses the unintentional contamination of food products by agents reasonably to occur in the food supply.
- Broad Mitigation Strategies-Basic Security Measures implemented to provide foundational support for the Defense Plan. Measures related to the facility, personnel and management.
- Vulnerability Assessment- Conduct for each type of food at your facility using appropriate methods to evaluate each point, step, or procedure in your operation to identify significant vulnerabilities and actionable process steps.
- Focused Mitigation Strategies – Applied after a vulnerability assessment and they target a specific vulnerable process step. FDA’s Mitigation Strategy Database can be a resource.
- Action Plan- As you are identifying Gaps in your security Measures and Assessment your plan is being constructed.
Questions??

Resources

1. Changes to Department of Homeland Security RBPS 12 Personal Surety Standards
   https://www.dhs.gov/cisa/cfats-personnel-surety-program

2. Reporting Cyber Security Incidents- US-CERT Incident Reporting System
   https://www.us-cert.gov/forms/report

3. Computing Networks Infrastructure Alerts
   https://www.us-cert.gov/ics/alerts

4. FDA Food Defense Plan Builder version 2.0