

Site Security and Food Defense Discussion



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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 ?



People



Procedures



Physical
Barriers



Access
Control
Systems



Cameras



Security Tool Spectrum

Your People!

- ☐ 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



Procedures

- ☐ 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?

Security Program Management



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.

FOOD
DEFENSE

FOOD
SAFETY

Food Defense Plans

- ❑ **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/sites/default/files/publications/fs-rbps-12iv-psp-508.pdf> &
<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
<https://www.fda.gov/food/food-defense-tools-educational-materials/food-defense-plan-builder>