**Company Name Document Reference:**

**Program Document**

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**Purpose**

 Establish a food defense program to protect your food product from deliberate acts of intentional adulteration such as sabotage or terrorist like incidents which may adversely impact food safety.

 **Outside Security Measures (including Inbound and outbound shipments)**

 To maintain security to ensure plant boundaries are clear and secured to prevent unauthorized entry (for example, no trespassing signs posted). In addition, plant entrances should be secured at all times including adequate perimeter lighting to deter unauthorized activities. The outside grounds are monitored during internal audits.

 Inbound shipments, including ingredients and packaging materials are visually inspected by employees trained in shipping and receiving. Incoming goods shall have the proper documentation which includes a certificate of analysis (COA) and/or a Bill of Lading (BOL) that references a purchase order (PO) number. Incoming shipments need to be sealed or locked upon arrival and the seal information needs to be verified. If product is suspicious or does not meet specifications management is notified and determines if the product is acceptable for receipt. Outbound shipments need to be sealed or locked and provided with the adequate paperwork. The Bill of Lading needs to include traceability information and count verification.

 Mail is handled away from food including ingredients and finished product. Mail receipt is restricted to the office areas. Employees who handle mail are aware of suspicious mail and US Postal Services guidelines.

 **Inside Security Measures**

 To protect product from intentional contamination throughout the production process (name of company) has put in place the following measures for inside security:

1. Suspicious packages or unexpected changes in inventory (product or equipment) are reported to management.
2. An emergency alert system is in place and tested, Emergency lighting is in place.
3. Restricted areas are clearly identified and only accessible to plant personnel. Restricted areas include all areas of processing raw material, ingredient and packaging product storage and processing equipment.
4. Personnel are required to contact someone in management if potential, tampering is suspected.

**Company Name Document Reference: #2**

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5. (name of company) utilizes well/city? water supply. Potability tests are conducted on a scheduled basis by an external lab. Pesticide testing is done annually. Backflow preventers and/or vacuum breakers are installed at point of use.

6. All personnel that are no longer employed or have just stopped employment must return all keys or other access methods. Passwords and key code access must be changed upon employee departure.

7. Chemical and hazardous material storage is secured by a lock. Potentially hazardous waste (Biological or chemical) is controlled and disposed of properly.

 8. Documents and sensitive information is stored in a secure area.

 **9.Cyber Security**

9. All electronic data systems have username and password, firewalls, or other mitigation strategies.

10. All Employees are trained on the cyber security expectations.

**Conduct Risk/Vulnerability Assessment of Process Flow**

A Food Defense –Risk/Vulnerability Assessment shall be developed and implemented. The plan shall comply with FSMA requirements defined in 12 CFR parts 11 and 121. The "FDA Food Defense Plan Builder" program can be used to conduct the risk/vulnerability assessment. The facility shall identify an employee that has training and certification as a Qualified Individual for the development and deployment of the Food Defense program.

The Food Defense – Risk/Vulnerability Assessment for (name of Company) includes the following:

* Process flow chart and detailed description of each step of the process
* Updated map of facility marking all points of entry
* A Food Defense – Risk/Vulnerability assessment – details the potential public health impact, evaluation of the degree of physical access to the product, and the ability of the attacker to successfully contaminate the product.
* Mitigations strategies – details the mitigation strategy, corrective actions, and verification.
	+ Once per year – challenging the system by having a third party verify mitigation strategies. Report findings and have corrective actions accordingly.
* Note: Vulnerability Assessment if reviewed annually by the Food Defense Team & that is led by the Qualified individual. (See vulnerability Assessment Example)

**Personnel Security Measures**

 All employees are vetted prior to hiring. Employee’s training is conducted covering the food defense plan.

 All non-employees entering the facility are required to sign the “Visitor Log” and are asked for identification. Non-employees are asked to be identified via a visitors’ badge or other means such as a different color (blue or red) hairnet than employees. Non-employees are not allowed to be in the plant unattended unless they have received management approval.

All employees have an awareness of plant security, i.e., keeping designated doors locked and reporting any suspicious activity.

**Incident Response Security Measures**

 Management is responsible to investigate and respond to incidents that occur. A security incident report is completed for each incident. Adulterated or potentially contaminated products are put on Hold. Customer complaints are investigated. Any unusual activities or security breaches that are reported shall be investigated. Employees have the ability to stop activities to minimize a potential food defense incident.

 **Food Defense Team**

* Identify team
* Food Defense Qualified Individual

**Emergency Contact List**

This list is posted in each office.

The food defense team is trained annually by reviewing the food defense plan.

Reference: Site map

 Food Defense Flow Chart

 Security Incident Report

Risk/Vulnerability Assessment Example

 Process Flow Chart and Teaching Model

 FDA Food Defense Planner

 12 CFR parts 11 and 121

 Training register

 **https://www.fda.gov/food/fooddefense**

**END**