

# **Dairy Plant Security**

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## **Food Safety and Security ...from the farm to the consumer**

*The world changed after  
September 11 attack and so  
did the need to ensure safety  
and security of dairy products  
from the farm to the consumer*

## Food Safety and Security ...from the farm to the consumer

- Industry initiatives
- FDA Activities
- National Legislation

## FIRST LINE OF DEFENSE

The most effective front line defense for a dairy plant are the employees!

## Educating Employees

- Take time to educate them on the importance of vigilance!
- They need to look for unusual events or suspicious behavior
- Solicit ideas to reduce risk from supervisors and operators

## Educating Suppliers

- Supplier awareness about preventing intentional contamination
- Review your supplier's biosecurity measures
- Work together to pinpoint potential risk and develop security plans

## Voluntary Guidelines for Sealing Raw Milk Tankers



## Voluntary Guidelines for Sealing Raw Milk Tankers



### GOAL:

- To ensure dairy products are protected
- To prevent safe milk from being unnecessarily destroyed
- To create a complete tamper-evident system

## Voluntary Guidelines for Sealing Raw Milk Tankers



- Seal all access points - numbered
- Maintain seal records
- Diver verifies
- Lock or seal openings when not in drivers control

## Voluntary Guidelines for Sealing Raw Milk Tankers



- Receiving location verifies seals and seal record before unloading
- Establish a protocol to follow for determining the acceptability of receiving the milk from the tanker if seals are broken  
Protocol should be be communicated to the owner(s) of all milk received, and plant management supervision

## Voluntary Guidelines for Sealing Raw Milk Tankers

- The Voluntary Guidelines for Sealing Raw Milk Tankers has been supported by the IDFA, NMPF, and the Executive Board of the National Conference on Interstate Milk Shipments
- FDA has given its verbal support for use of these guidelines by the Dairy Industry

## Plant Dairy Security: IDFA Guidance for the Dairy Industry



## **Plant Dairy Security: IDFA Guidance for the Dairy Industry**



Purpose: To help evaluate the security and integrity of their operations in dealing with a deliberate act of tampering.

Recognize: Each plant has unique physical layouts, employee policies, products, and vulnerabilities.

## **Plant Dairy Security: IDFA Guidance for the Dairy Industry**



### **INCOMING MATERIALS - Product Tankers**

- Never leave the truck unlocked and unattended
- No access to the inside of the tanker, unless unloading or cleaning
- Driver identification, background checks

## **Plant Dairy Security: IDFA Guidance for the Dairy Industry**

### **INCOMING MATERIALS**

- Reconcile incoming materials with actual receipts
- Supervise off-loading of all incoming materials
- Receiving Bay restrict entry and secure equipment and sample points
- Secure review on a daily basis all external inlets for incoming materials located on the outside of the plant
- Water supply security measures

## **Plant Dairy Security: IDFA Guidance for the Dairy Industry**



### **GENERAL PLANT SECURITY**

- Perimeter of your plant, entrance and egress to the plant and warehouses, access to all storage areas, and key areas within the plant
- Appropriate fencing, gates, guards, sensors, video surveillance, outside lighting, air intake points

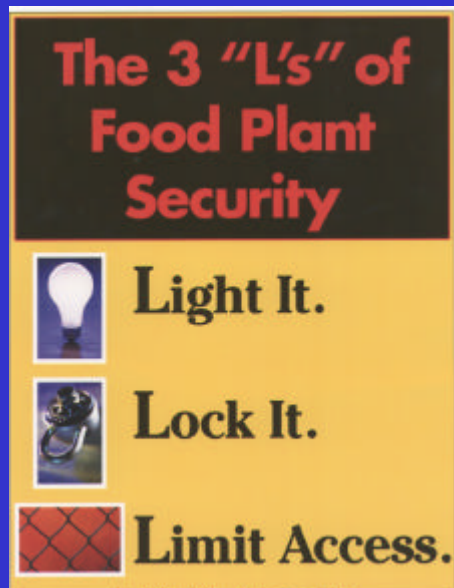
## Plant Dairy Security: IDFA Guidance for the Dairy Industry



### PLANT SECURITY - Interior

- Restrict access to chemical storage.
- Lock or secure all access that might permit entrance to the plant or material storage outside the plant (silos, etc.)
- Employee traffic
- Protect computer access to production records

## NFPA Plant Poster



**Plant Dairy Security:  
IDFA Guidance for the Dairy Industry**

PERSONNEL - Employee Access

- Employee background checks
- Train employees in security and documentation procedures.
- Key cards/keys

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PERSONNEL - Employee Access

- Establish policy for personal item in food handling areas
- Employee lockers
- Employee clothing
- Casual laborers policy
- Plant personnel should note and report unusual behavior

## **Plant Dairy Security: IDFA Guidance for the Dairy Industry**

### **PERSONNEL -Visitors and Vendors**

- Sign-in procedure and escort service for visitors
- Identifying clothing
- Security camera

## **Plant Dairy Security: IDFA Guidance for the Dairy Industry**

### **DISTRIBUTION -Final Product**

- Secure trucks between stops or when driver not present
- Public storage warehouses and shippers
  - Review procedures
  - Random inspection
- Maintain records



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**CRISIS PLANNING**

- Develop and test a crisis plan

Emergency numbers:

- Local police/fire/rescue team.
- FDA Emergency Operations: **(301) 443-1240**
- IDFA:

Cary Frye **(202) 220-3543; (202) 841-0066** (cell)

Allen Sayler **(202) 220-3544; (202) 841-1029** (cell)

**FDA Biosecurity Activities**

## FDA Activities

- Input from food industry sectors
- Potential vulnerabilities
- Present food safety and security practices
- Possible Improvements
- Issued Industry Guidance for Food Processors and Food Importers

## FDA Guidance for Food Producers, Processors, Transporters and Retailers

- Food security management
- Physical security
- Employees
- Computer systems
- Raw materials and packaging
- Operations
- Finished products a section
- Security strategies and internal security system audits

## FDA Guidance for Food Producers, Processors, Transporters and Retailers

- Recommendations are not legally binding
- Implemented where practical
- FDA might revise the guidance documents to include
  - tamper-evident packaging for foods
  - trace-back/trace-forward procedures and/or records

## National Legislative New Bioterrorism Bill Changes FDA Authority

## Bioterrorism Bill

- Authorization of appropriations for improving preparedness and response- \$2.7 billion (2002)
- Authorization of appropriations for safety and security of food supply - \$314 million
- Protecting the safety and security of the food supply
  - Amendments to FDC Act

## Bioterrorism Bill

- Authorization of appropriations for controlling dangerous biological agents and toxins
- Drinking water security and safety
- Funding to USDA for research in animal health diseases agriculture biosecurity
- Biosecurity upgrades for USDA labs

## Elements of Bioterrorism Bills

- Protection against intentional adulteration of food
  - Increased inspection of imported foods
  - More port inspectors
  - Develop rapid test methods to detect adulteration
  - Improved database on imports
  - Authorization of \$100 million

## Elements of Bioterrorism Bills

- Significant consequences for the food and dairy industry
- New FDA regulatory powers
- New FDA investigative powers
- New sanctions for violations
- Imported and domestically produced food and ingredients

## Elements of Bioterrorism Bills - New FDA Authority

- Administrative detention
- Maintenance and inspection of records
- Registration of food manufacturing, processing and handling facilities
- New requirements for imported foods

## Administrative Detention

- Not triggered by a “Public Health Emergency”
- Authorizes “any officer or qualified employee” to detain food during investigation, inspection, or examination
- “**Credible evidence** that the article of food is a threat of serious health consequence of death to humans or animals”

## Administrative Detention

- Detention of up to 30 days
- Requires that the product is labeled and moved to a secured facility
- Detention order by the “Secretary or an officer or qualified employee designated by the Secretary” - FDA District Director or higher

## Administrative Detention

- Appeal of detention order to the Secretary of HHS.
  - Confirm or terminate the challenged order within 5 days
- Released by the Secretary’s order or expiration
- “Prohibited Act” to release any detained product
  - Subject to monetary penalties or imprisonment

## Inspection of Records

- Permit access to and copying of **all records** related to manufacturing, processing, packing, distribution, receipt, holding or importation of food.”
- When the Secretary has “**reasonable belief**” of adulteration and a serious threat to humans or animals
- Farms and restaurants are exempt

## Inspection of Records

- Recipes, financial, pricing, personnel, and research data are exempt
- Factory inspection authority by FDA extend
- Failure to comply - “Prohibited Act”
  - Subject to monetary penalties or imprisonment

## Maintenance of Records

- “May establish” requirements on establishment and maintenance of records
- Record maintenance not longer than 2 years
- Trace the **source** and **distribution** of food and packaging - (one step forward and back)
- Record keeping requirement - Rule making
- 18 months -Allow for industry input

## Registration

- Any facility engaged in manufacturing, processing, packing or holding food for consumption in the U.S.
- Registered with FDA
- Identity, address of each facility, trade names, general food category
- Assign a number
- Notify Secretary of changes in a timely manner

## Registration

- List maintained by FDA is not subject to FOI
- Farms are excluded as well as restaurants, retail establishments, and nonprofits where food is solely for immediate consumption
- Domestic Facility
- Foreign Facility if food is not further processed.

## Registration

- Failure to register is a “Prohibited Act”
  - Subject to monetary penalties or imprisonment
- Unregistered imported foods - held at port of entry until registered
- Regulations are subject to Rulemaking - 18 months
- Allow industry input

## IDFA Activities

- Analysis of new regulations
- Input for rulemaking
- Education for industry compliance
  - “Hot Topics” workshops
  - Web site information - [www.idfa.org](http://www.idfa.org)
  - Publications

## QUESTIONS ?

