

National security at the dinner table: Changes aim to align national security with food safety

While there is a heightened concern about foodborne illness, processors need to strengthen their security to protect their products from tampering.

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National security has always been an important issue in our country. It continues to become even more so in 2011 as we're nearly a decade removed from the tragedy of September 11, 2001, and the anthrax attacks that followed. A shift in our mindset forced US citizens into a new heightened awareness of our country's security and what it means to be safe.

Today, we stand barefoot and belt-less at the airport because of it. Yet, with the possible threats to our national security, dangers are not just found in airplanes and delivered mail. There is one area rarely considered that will soon see more scrutiny: the food we eat.

In recent years, there has been an evolving concept regarding food safety versus food defense. There has always been public concern and government regulations for food safety, but *food defense* may take the front seat in how we perceive the safety of our food supply. For the first time, the term actually appears in legislation. Food defense is defined as measures to protect food from deliberate tampering from criminal or terrorist sources.

Existing food guidelines from the FDA and the USDA and state and local governments are intended to keep our food safe and edible. But what are we doing to keep production facilities secure? Those who would do America harm will strategically target whatever they can to spread terror the fastest and most horrific ways possible. Ameri-

ca's food production companies could be a target.

Prior to becoming law, federal guidelines for food security (defense) have been voluntary, somewhat misleading and often transitional. Congress has worked to convert these guidelines into regulations, which is a switch from the typical posture of waiting until a high-profile event such as the anthrax attacks before expediting real political action. Interestingly enough, the new legislation was passed by Congress within days of a CBS television re-

lease of a potential food contamination threat directed at the hospitality industry.

Still, food industry executives should be prepared to respond to increased government involvement with food defense as a result of the new regulation whose final rules still have to be written in the next several

years. Scientific and performance standards will be developed to connect the food industry with national security processes. The good news for security experts is that it will make their jobs even more valuable, especially if they have food and kindred products experience. The bad news is that many food industry executives already have a lot on their plates and aren't familiar with the issues surrounding food defense.

This article brings to light the information necessary to become knowledgeable about the right questions to ask and how to find answers.

The President recently signed into law the Food Safety

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Modernization Act (H.R. 2751, S. 510), which modernizes the food safety system to better prevent food-borne illness and to respond to outbreaks. This will bring many changes to food production, packing and distribution facilities. It gives the FDA and the Secretary of Health and Human Services the authority to regulate food, suspend the registration of a food facility, and order a recall if food is believed to be tainted, rather than relying upon voluntary recalls.

These changes will require food facilities to analyze hazards, produce preventive controls and create a food safety plan before introducing any food into interstate commerce. Each facility will be held to higher performance standards and a new inspection schedule based on risk. Records of food and those handling it will be under scrutiny, and food tracing programs will be implemented.

Setting a food defense plan

Each organization's food defense plan will have multiple security requirements covering every aspect of the facility, including: processing, materials handling, personnel, storage, shipping/receiving, site security, utilities connections and the use of cyber-security.

Here are just a few of the issues food companies should consider and prepare for in the coming years:

- Food can be deemed mis-branded if it were manufactured, processed, packed, or held in a facility that is not registered.
- A food defense plan will be required before introducing any shipment of

food into interstate commerce.

- Food will be deemed adulterated if it has been manufactured, processed, packed, transported, or held under conditions that do not meet performance standards.
- Food will be deemed adulterated if it has been processed, packed, transported, or held under conditions that do not meet safety standards for raw agricultural commodities.
- New tracing programs aim to identify each person who grows, produces, manufactures, processes, packs, transports, holds, or sells food.
- Violations of any food tracing system requirements will be prohibited; i.e., guidelines will become mandatory.
- Requirements include refusal of admission of food products/ingredients or articles that have not complied with food tracing system standards.

John Doe Processing lapse in security leads to consumer product recall

This is not the headline you want published because you had a simple lapse in security. But once guidelines become laws, an overlooked security breach could be devastating. Examples of common lapses in security could be something as simple as: a malfunctioning security gate, site security fencing installed with barb-wire facing the wrong way, or the corporate executives' "testing" their employees with crisis situation "fire drills." The media, however, won't look at the nuances. Instead, they'll go for the **BIG story**: John Doe product recall, John Doe plant explosion or Terrorists target John Doe plant.

- Food can be deemed mis-branded if it is part of a shipment offered for import into the US and such shipment is in violation of provisions requiring a certification of compliance.

What can food companies do now and in the future?

Preventive controls are one the strongest ways for a company to improve security. Food companies should be taking the time now to re-examine security, sanitation procedures and practices, hygiene training, process controls, and manufacturing practices, as well as verification practices and procedures for suppliers and incoming ingredients. This checklist could also include onsite auditing of suppliers and testing of incoming ingredients.

New laws will require procedures to be in place for monitoring those preventive controls and a description of the corrective procedures, verification activities, record keeping, recall procedures and tracing methods in case of emergency. Companies could be subject to more random testing. The fines for any civil penalties range from \$20,000 to \$7.5 million.

These laws are not yet approved, and right now many of these topics are considered guidelines.

However, processors can no longer consider guidelines "voluntary," because consumers are assuming food production companies are following them.

When something goes wrong within a food processing facility, the media will not focus on the details, but rather there was a security breach. The company's brand iden-



What are we doing to keep production facilities secure?



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Other performance metrics processors may consider adopting

Performance metric	Ideal result
Percent up-time for installed security systems	100%
Inspection of active identification badges to ensure no separated employees still have active cards	0 active cards for separated employees or contractors
Percent of employees who have received security awareness training	100%
Analysis of reported security incidents to identify victim assisted crimes	Percent continuously declining on an annual basis
Percent of the time the facility is secure by reviewing door alarm activity (forced, propped)	100%

tity and public-relations image will be under siege, and questions will arise about its commitment to adhere to federal guidelines. Processors should consider converting these guidelines into a firm policy.

McCormick & Company, Inc. is a good example as it began using goal-based security instead of a risk-based approach. McCormick's security team found that risk-based security for identifying and quantifying risk is a process that can be somewhat subjective. If it is not properly facilitated, risk-based security may not cover all risks in a security program or could leave management with challenges in prioritizing which risks to address first.

Moving from managing risks to goals

Approaching security with specific goals in mind allows experts to be more objective and achieve quantifiable results. Once basic security measures are in place, additional risks are more easily identified.

Using a goal-based security concept, McCormick's team was able to better understand the security issues involved; define what results must be demonstrated to ensure goals are met; and establish appropriate strategies to address security issues.

General benchmark goals for a food processing operation include:

1. Control the operation. Establish a secure perimeter.
2. Do background checks. Look into the background and character of those who work in the facility.
3. Understand vulnerabilities. Identify and control all potential vulnerabilities.
4. Always be vigilant. Investigate, report and mitigate security breaches.
5. Be proactive. Establish plans, policies, procedures and training.

Reviewing goals

The McCormick team distilled each goal and identified specific measures to achieve them. For example, with Goal 1, every access door, emergency exit, egress door,

overhead door, window, vent or other opening was controlled to deter unauthorized/undetected entry. A facility can easily demonstrate whether that solution is in place.

Another example is Goal 5—to document the security/food defense plans of the facility and to develop and document policies, procedures and training to support these plans.

In order to achieve that goal, McCormick conducted a security audit, vulnerability analysis and risk analysis for the facility to assess what measures were in place and what measures still required implementation. The team also created a timetable for adding those measures.

Keep in mind, food security does not stop with plans and perimeters. A company's employees (Goal 2) can be one of the greatest risks, or, conversely, its greatest security assets.

Security and food defense awareness training should be conducted and documented for all employees at least annually. That training should include education on protecting the facility, individual responsibility with regard to access card use and the actions to be taken if they observe danger.

Whether you use a goal-based or risk-based methodology to establish your security program, it is essential to include some quality assurance measures much like companies dedicate resources to quality assurance in the production of food products. Very few organizations have the means to know whether a security program is functioning effectively, and most have several common areas for improvement. Some of the common weaknesses observed in food manufacturing facilities include:

The "No-Incident" Gauge—Because an organization has had little in the way of security incidents, it is easy to conclude that a security program is effective. However, it may



Risk-based security may not cover all risks in a security program.

just be that no adversary has ever attempted to commit a crime or terrorist act against the organization. When was the last time you simulated a security breach to see how staff or security react?

Flawed Assumptions—Many processors find flaws in their security systems because of flawed assumptions from the beginning about security. For example, company executives often assume that panic alarms are working and that terminated employees no longer have building access. Often, this is not true. Companies spend tens and sometimes hundreds of thousands of dollars on security systems, and there are often flaws in the way these systems perform. When was the last time your company conducted a check of basic security systems?

To borrow from one of Steven Covey's habits of highly effective people, one strategy to achieve an effective security program is to "Begin with the end in mind." Whether you use goal or risk-based security, management will want to be actively tracking program performance to ensure security and staff will properly respond to a potential—or actual—security breach. Through the utilization of performance metrics, management can have true measurements of security's effectiveness.

For example, by simulating a security breach, management can assess whether security or staff responded positively and grade the results of the drill as a pass or fail. Management may set a target that it wishes to have an 80

percent pass rate on all security drills. Organizations can set goals as high as they wish depending on the sophistication of its program.

Going beyond benchmarks

Understanding benchmarks can help companies get started. Food companies would be well advised to consider bringing in unbiased security management expertise, particularly those with food industry knowledge not tied to a technology manufacturer or integrator. These experts have the skills and experience to assess an organization's security needs and conduct security drills/exercises, penetration testing and security system engineering. They can also establish performance metrics to provide management with the confidence that their security programs are performing adequately.

Food executives and facility managers must be prepared to respond to the new regulation in the coming years. Compliance is going to get more challenging, not more lenient. If food processors expect their security program to be effective, executives must know how to establish performance metrics.

Preparing for unknowns is a priority in all phases of business. Food defense is certainly no exception. Don't wait until crime happens. Changes to our lifestyles over the past decade should illuminate the importance of food defense in your organization.

About the authors



William Ramsey served as a military police, Baltimore police detective and investigative agent in the thoroughbred racing industry before joining McCormick & Company, a global manufacturer of spices, flavors and seasonings. Currently, Ramsey is the company's corporate director of security with

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Among his many professional affiliations, Ramsey is a member of the ASIS Agriculture and Food Security Council, ASIS CSO Roundtable and the National Center for Food Protection and Defense. He served as the chairman of the Food Defense Committee of the Grocery Manufacturers Association and was the recipient of the National Food Processors Association Food Security Award in 2003. In December 2008, Ramsey was named by *Security Magazine* as one of the "Top 25 Most Influential People in the Security Industry."

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Pisciotta has performed numerous projects in the agricultural, food and chemical sectors in the areas of criminal and terrorist attack defense through the application of effective threat assessment.