

ELEMENTS OF A FUNCTIONAL FOOD DEFENSE PLAN

The Agency encourages establishments to develop, write, implement, test, assess, and maintain a food defense plan. These are the elements of a functional food defense plan. The information below serves as guidance for completing the food defense plan profile extension questions.

A. Develop. The establishment develops a written plan by performing a vulnerability assessment. As part of the assessment the establishment:

- looks for vulnerable points at the establishment,
- determines what the risk factor is for each point,
- develops defense measures at each point that it has identified as high risk, and
- creates a written plan to implement defense measures.

Defense measures are actions taken to build barriers or shields around vulnerable areas to prevent intentional product adulteration. The defense measures that the establishment develops can be physical barriers such as locks, fences, and cameras, or the measures can be changes in procedures such as limited access, escorting visitors, or supervising contract employees.

B. Implement. The food defense plan is implemented when the defense measures identified in the plan are in place and used as intended.

C. Test. The establishment tests the written plan by monitoring periodically to evaluate the effectiveness of its defense measures. Examples for tests or drills used may include, but are not limited to:

- making unannounced entrances at various perimeter checkpoints,
- checking plant employee ID badges,
- checking locks on doors, windows, storerooms or water and ice facilities,
- performing a mock recall, or
- testing lab or storeroom inventory procedures.

D. Assess. The establishment assesses the plan by reviewing the plan and revising it as necessary whenever new risks are discovered. For example, certain changes in the production process, contracted services, and production lines may be assessed to determine whether new defense measures should be added to the food defense plan.

E. Maintain. The establishment maintains its plan by ensuring that the defense measures it implements continue to be effective. For example, an establishment may purchase materials or equipment designed for food defense, make repairs, or train employees as necessary for the plan to be successfully implemented.

NOTE: There are no regulatory requirements for an establishment to develop a plan or to include the elements above in its food defense plan. However, FSIS strongly encourages establishments to maintain a food defense plan. If the establishment has additional questions on where they can seek guidance to develop a food defense plan, they should contact the Technical Service Center at 1-800-233-3935.