# Part 7 – Preventive Food Defense Procedures

- Secure Employee/Visitor Procedures (60 pts.)
- Secure Facility Procedures (120 pts.)
- 180 Total Points Possible

#### 7-1 Preventative Food Defense Procedures

Areas where strategies should be developed to reduce risks and <u>a person is</u> <u>designated to oversee it</u>. These areas include:

- Visitor protocols
- Building security
- Employee hiring
- Product security and integrity
- Visual vigilance
- FDA Registration





**5 Points Document: Food Safety Program** 

#### **7-2 Preventive Food Defense Procedures**

A food defense training has been provided to all employees.

#### Some specific suggestions include:

Develop a SOP for employee hiring

Provide a badge system for employee

identification



5 Points Document: Food Safety Program & Worker Training Log

#### 7-3 Preventive Food Defense Procedures

Employees are aware of whom in management they should contact about potential security problems/issues.

#### Manage building security by:

- Lock all buildings when not in use
- Secure all agricultural chemicals and verify inventory on a scheduled basis.
- Restrict access to keys
- Use fencing, cameras, and surveillance, as necessary







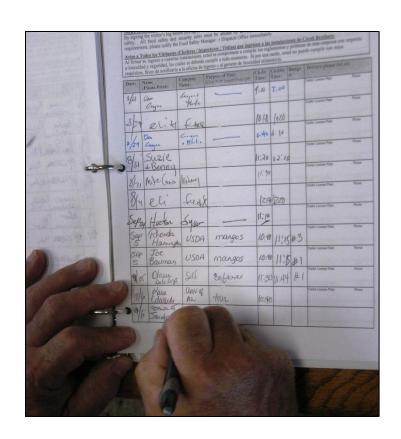
## 7-4 Preventive Food Defense Procedures

Visitors are required to check in and out, when entering/leaving the facility.

This strategy might include:

- A central check-in location for visitors
- Maintaining a visitor's log
- Accompanying all visitors at all times
- Posting signs directing visitors to appropriate locations





## **7-5 Preventive Food Defense Procedures**

The purpose for the visitation to site is verified before granting admittance





#### 7-6 Preventive Food Defense Procedures

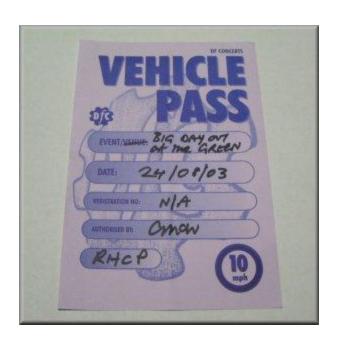
Accompanying all visitors at all times. Visitors are prohibited from the packing/storage areas unless accompanied by an employee.





## 7-7 Preventive Food Defense Procedures

Employee and visitor vehicles, to and from the site are subject to inspection.

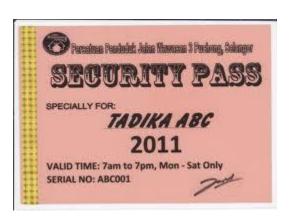




## 7-8 Preventive Food Defense Procedures

Parked vehicles display a decal or placard issued by the facility

EXPIRES	PASS NO	
TEMPORARY VE		
KINE GALL (Final) KINE THRESTS (Final Section)	HEATE WA	
WORLD STREET, Many Many Your Date and	corner or a store	
1. Display this pass in lower left corn 2. Observe speed limit signs as posts 3. Park is authorized spaces only. 4. All vehicles subject to imposfice. THIS PASS MUST BE RETURNED TO PERSON FOR CANCELLATION ON the Case 10000 IT to 10000 IT to 10000 IT.	d. THE ISSUING ACTIVITY IN	



#### **5 Points**

#### 7-9 Preventive Food Defense Procedures

Staff is prohibited from bringing personal items into the handling or storage areas.

NOT RESPONSIBLE
FOR CARS OR PERSONAL
PROPERTY LOST OR STOLEN
OR FOR INJURY TO PERSONS,
CARS, OR PERSONAL
PROPERTY ON PREMISES

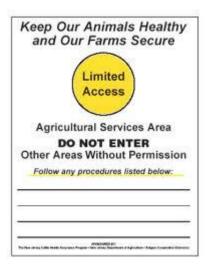






**5 Points** 

#### 7-10 Preventive Food Defense Procedures





Control access to your product. Limit access to product storage areas to only those individuals who require access to do their jobs

## **7-11 Preventive Food Defense Procedures**

Management is aware of employees on the premises, and the area they are assigned to







**5 Points** 

## 7-12 Preventive Food Defense Procedures

A system of positive identification of employees has been established and is enforced







## 7-13 Preventive Food Defense Procedures

Uniforms, name tags, or identification badges are collected from employees prior to the termination of employment





# **7-14 Preventive Food Defense Procedures**

The mailroom is located away from the packing/storage facilities







**5 Points** 

**7-15 Preventive Food Defense Procedures** 

Computer access is restricted to specific personnel









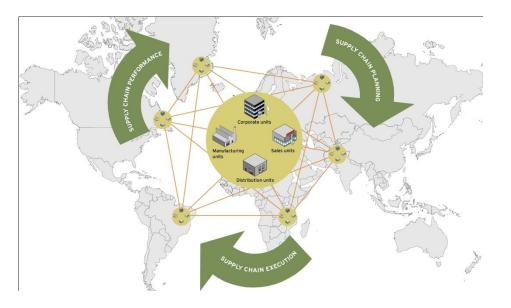


## **7-16 Preventive Food Defense Procedures**

## A system of traceability of computer transactions has been established







**5 Points** 

## 7-17 Preventive Food Defense Procedures

A minimum level of background checks established for all employees







**5 Points** 

#### 7-18 Preventive Food Defense Procedures



Routine security checks of the premises are performed for signs of tampering, criminal or terrorist action







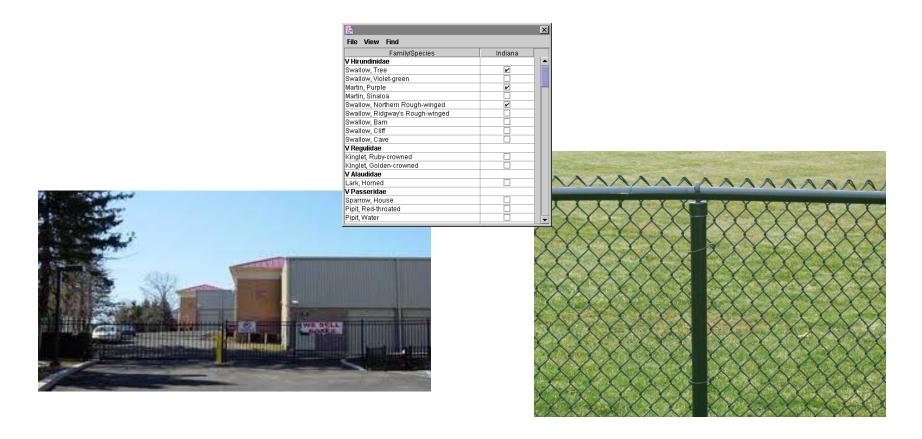
## **7-19 Preventive Food Defense Procedures**

Perimeter of facility is secured by fencing or other deterrent

**5 Points** 

#### 7-20 Preventive Food Defense Procedures

Checklists are used to verify the security of doors and windows



## **7-21** Preventive Food Defense Procedures

All keys to the establishment are accounted for









# **7-22 Preventive Food Defense Procedures**

## The facility has an emergency lighting system









**5 Points** 

# **7-23 Preventive Food Defense Procedures**

The facility is enclosed



## 7-24 Preventive Food Defense Procedures

Storage or vehicles/containers/trailers/railcars that are not being used are kept locked







**5 Points** 

## **7-25 Preventive Food Defense Procedures**

## Delivery schedules have been established





**5 Points** 

## **7-26 Preventive Food Defense Procedures**

The off-loading of incoming materials is supervised





## **7-27 Preventive Food Defense Procedures**

The organization has an established policy for rejecting deliveries



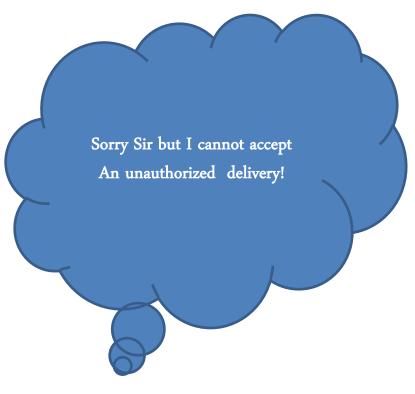




## 7-28 Preventive Food Defense Procedures

Unauthorized deliveries are not accepted





#### 7-29 Preventive Food Defense Procedures

The company does not accept returned (empty) containers for packing of product unless they are sanitized containers intended for reuse



## 7-30 Preventive Food Defense Procedures

Inspect product returned to the facility for tampering







#### 7-31 Preventive Food Defense Procedures

The company has identified the individual(s) with at least one backup, who are responsible for recalling the product



73617	LETTUCE CHOP W/50% ROMAINE 4/2.5#	4/2.5 1b bags	05/11/2010 and before
73620	LETTUCE CHOP W/50% ROMAINE 5/4#	5/4 lb bags	05/11/2010 and before
73621	LETTUCE CHOP W/ ROMAINE 4/5#	4/5 lb bags	05/11/2010 and before
73622	LETTUCE CHOP W/50% ROMAINE 5/4#	5/4 lb bags	05/11/2010 and before
73843	SALAD ALL AMERICAN LETTUCE 4/5#	4/5 lb bags	05/11/2010 and before
73844	SALAD SUPERIOR BLEND 2/5#	2/5 lb bags	05/11/2010 and before
73847	SALAD MIX W/ROMAINE 4/5#	4/5 lb bags	05/11/2010 and before
73849	SALAD CALIFORNIA BLEND 4/5#	4/5 lb bags	05/11/2010 and before
73850	SALAD MIX CHARTHOUSE 4/2.5#	4/2.5 lb bags	05/11/2010 and before
73856	SALAD ALL AMERICAN LETTUCE 4/5#	4/5 lb bags	05/11/2010 and before
73857	SALAD ALL AMERICAN LETTUCE 1/5#	1/5 lb bag	05/11/2010 and before
73861	Salad Mix w/Romaine LCR 4/5#	4/5 lb bags	05/11/2010 and before
73862	SALAD MIX SIGNATURE 4/2.5#	4/2.5 lb bags	05/11/2010 and before
73863	SALAD MIX W/ 50% ROMAINE 4/5#	4/5 lb bags	05/11/2010 and before
73864	SALAD MIX W/ 50% ROMAINE 1/5#	1/5 lb bag	05/11/2010 and before
74033	ROMAINE CHOP 6/2#	6/2 lb bags	05/11/2010 and before
74034	Romaine Chop 4/2.5#	4/2.5 lb bags	05/11/2010 and before
74035	Romaine Chop 2/2.5#	2/2.5 lb bags	05/11/2010 and before
74036	Romaine Chop 6/2=	City Con (St.)	

74036 Romaine Chop 6/2±

74037 ROMAINE SHRED 1/4" x 2" 6/2±

74874 KIT GARDEN SALAD SMALL BOWLS 5±

74875 KIT CHEF SALAD SMALL BOWLS 5.5±

74876 KIT CHICKEN CAESAR SMALL BOWLS 4.5≠



#### 7-32 Preventive Food Defense Procedures

The operation has performed a "mock recall" that was proven to be effective.

Company
Policy for
Performing
A
Mock Recall







## 7-33 Preventive Food Defense Procedures

Product imported from outside the US is segregated from domestic product



**Domestic** 



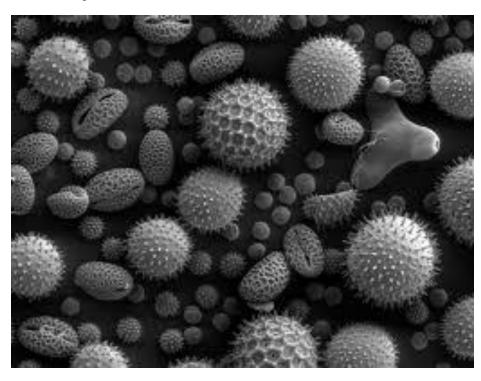
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**5 Points Document: <u>Traceability Program</u>** 

#### 7-34 Preventive Food Defense Procedures

If allergens are handled by the facility, they are segregated from products to avoid cross contamination. Peanuts are a good example of this



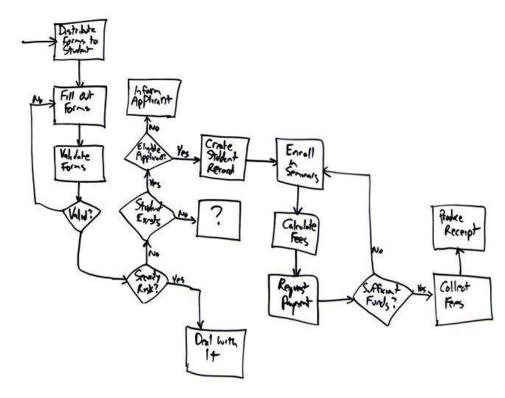




## 7-35 Preventive Food Defense Procedures

Floor plans, product flow plans, and/or segregation charts are available





## 7-36 Preventive Food Defense Procedures

The organization has registered with the FDA



