

---

# Creating A Food Safety Net

[Food Management](#)

[FM Staff](#)

FM Staff

Wed, 2004-09-01 12:00

Robert Young

In the post-9/11 era, food safety programs increasingly are seen as needing to cover a new, potential type of threat to food security—that of intentional food tampering or contamination.

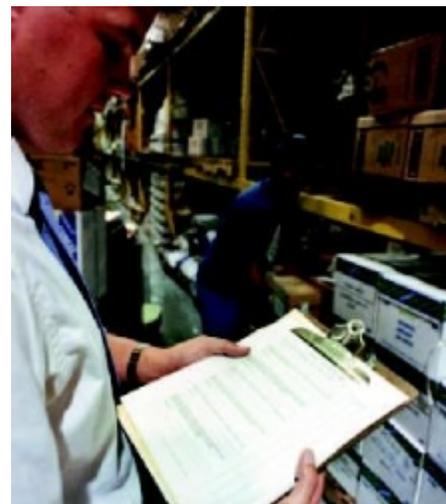
The natural question that arises is: what are the appropriate steps that you, as a foodservice operator, can take to best ensure that possible threats of this sort are minimized?

Begin by arming yourself with the information needed to establish an effective food security program. One good place to start is with information that is available from the U.S. Food and Drug Administration. In March, the FDA issued *Guidance for Industry: Retail Food Stores and Food Service Establishments—Food Security Preventive Measures Guidance*.

This publication identifies the kinds of preventive measures food-service operators may take to minimize the risk that food under their control will be subject to tampering or other malicious, criminal or terrorist actions. It also identifies additional resources for information.

Another document, *Risk Assessment for Food Terrorism and Other Food Safety Concerns*, provides a context for the problem and can be found on the Web at the FDA's Center for Food Safety and Applied Nutrition at [www.cfsan.fda.gov](http://www.cfsan.fda.gov)

Developing a positive, proactive, risk-based management approach to assessing and preventing malicious food contamination is key to addressing such concerns. And many of the standard



It has always been good practice for operators to personally visit the warehousing facilities used by their suppliers. Ensuring that every part of the local food chain is secure and sanitary is an important part of any HACCP program.

---

operating procedures that should be incorporated into a sound HACCP program should already be focused on verifying security in the following areas:

- Vendor assurance and recall strategy,
- Facility security and restricted access,
- Employee screening, supervision and training,
- Foodservice operations throughout the flow of food.

### **Vendor Assurance**

As part of HACCP plan documentation, all of your suppliers (manufacturers, distributors and transporters) should provide documentation on their own food safety and security practices, including systems that will rapidly notify your facility in the event of a recall or product contamination issue. **Tip:** *Identify primary and back-up contacts within your organization who can be reached 24 hours a day, 7 days a week.*

All deliveries should be restricted to scheduled times. When inbound vehicles arrive, it is good practice to immediately reconcile deliveries with what was ordered. Receivers should be trained to not only look for items that may be missing from the order but also to be on the watch for any "additional" items that were not ordered.

Inspect all incoming products for signs of tampering, counterfeiting, contamination or damage, and reject any suspicious food. Never leave food unsecured or unattended at any state of delivery, storage, preparation or service. **Tip:** *Inspect both inbound and outbound vehicles.*

### **Facility Security**

Ensure the physical integrity of your facility by securing all doors, windows, ventilation systems, utility rooms and roof openings. Protect the perimeter by establishing clear zones for employees, customers and visitors and implementing a program to account for all employee keys and visitor badges.

It is especially important to restrict entry of unauthorized staff, vendors and customers from food and chemical storage, food preparation and food holding areas. In open display areas, such as salad bars, vigilant monitoring is essential to prevent deliberate contamination.

Employees' personal items (clothing, bags, etc.) should be stored away from food storage and production areas. **Tip:** *Routinely log and track all hazardous materials such as cleaning chemicals, and investigate promptly if anything is missing.*

## **Employee Screening and Supervision**

Use pre-hire screening programs to check all applicants' immigration status and criminal background, without regard to the applicant's race, religion or ethnic background. Pay special attention to contract, seasonal and temporary employees. Employees should be required to wear identification at all times and should be allowed access only to areas essential to perform their required task. **Tip:** *Don't forget to collect employee IDs, badges and uniforms upon termination or resignation.*

While employees can potentially be a source for food tampering, they also can be your best defense in preventing security breaches that would allow for deliberate attacks. This is why food security awareness should be incorporated into new hire orientation and ongoing training for existing employees. **Tip:** *In addition to educating employees on how to identify and prevent problems, make sure they know how to report and respond to actual or suspicious actions or threats. A confidential "tipline" makes it easier for employees to report suspicious activities.*

## **Foodservice Operations**

Pre-packaged foods (those sold or offered in their original packaging) should be stored in a secure location to prevent tampering. They should be inspected for signs of adulteration before displaying or serving them and monitored during display to prevent manipulation.

Foods prepared or packaged on-site should be prepared using a HACCP-based plan and should remain secured and monitored during storage, display and service to prevent post-production contamination.

Self-service and bulk-displayed items are the most vulnerable. They should be secured during storage of ingredients to prevent contamination and proactively monitored while on display to prevent tampering. **Tip:** *In addition to providing for food security, a HACCP-based plan will address additional food safety areas such as cross-contamination, employee hygiene and facility cleaning and sanitation.*

## **Conclusion**

Management must maintain an environment of as close to total control as possible. Primary food security responsibility should be assigned to one individual, who should be fully educated in the requirements of the assignment. A step-by-step crisis management plan (including internal and external communications) will let you respond in the event of a tampering or contamination incident. By prioritizing food security and establishing a proactive plan, you can both guard against deliberate contamination of the food supply and be prepared for outside contingencies.

For more information on developing a food security program, or for an independent assessment of an existing program, contact The Steritech Group at [www.Steritech.com](http://www.Steritech.com) or 1-800-868-0089.

**By Dr. Robert Strong** , *Vice President, Quality Management, The Steritech Group, Inc., and*  
**Jamie Stamey** , *Food Safety Consultant, HealthyAndSafeFood.com.*