

Food Defense Plan for Meat Company

Security Team-

1. Walter Smith- Owner-
2. Betty Davis- Office Manager / HACCP Coordinator
3. Jason Bing- Slaughter Floor Manager
4. Gina Seals- Processing Floor Manager

Company/building overview

Meat Company is a very small state inspected slaughter and processing facility that is located 12 miles out of town on a fenced 10 acre lot. The owners of this plant live on the 30 acre lot adjacent to the 10 acres. There are 10 employees year round and 1-4 more during busy times. This is a low volume traffic area and there have never been problems with vandalism, harassment, or security issues. This plant slaughters and processes Beef, Bison, Elk, Pigs, Sheep and Goats.

The hours of operation are Monday-Friday 7:00am – 4:00pm and Saturday and Sunday by appointment only for product pick up. Slaughter is done on Wednesdays and begins at 7am. Clean-up starts 4:00pm and ends at 6:00pm.

Outside Security

1. What food defense measures does your plant have in place for the exterior of the building?
 - a. There are three doors that enter the building. The first door enters the office, the second door opens from the slaughter facility to the pens and the third door is the emergency exit door in the slaughter area.
 - i. The meat facility is fenced off into its own 10 acre lot. There is a cattle guard and gate at the entrance of the facility. The gate is rarely closed as there has been no cause to close this gate.
 - ii. The owner, office manager and slaughter floor manager each have a key. This key only opens the office door dead bolt and lock.
 - iii. The emergency exit has an alarm that is disabled, but is self-locking. There is no handle on the outside of this door.
 - iv. There are 3 large yard lights outside the building. The first is near the loading chute / pens, the second is on the NW corner of the building and the third is in the parking lot near the office door entrance.
2. Are the following secured with locks, seals, or sensors when unattended (after hours/weekends) to prevent entry by unauthorized persons?

- a. This building doors and windows are equipped with locks and deadbolts. The owner or office manager verifies the windows and locks the deadbolt on the doors when they leave.
 - i. All windows and doors are equipped with locks
 - ii. The roof opening and vents contain screens and are not large enough for entering.
 - iii. This facility does not have trailer or truck bodies, tanker truck hatches, railcars or bulk storage tanks or silos located on the 10 acres of this facility.

- 3. Does your facility have food defense procedures for people and/or vehicles entering the plant and/or parking in your lot?
 - a. This plant is a very small and is not a high volume traffic area. Vehicles are noticed as are unfamiliar people.
 - i. The meat facility is fenced off into its own 10 acre lot. There is a cattle guard and gate at the entrance of the facility. The gate is rarely closed as there has been no cause to close this gate.
 - ii. As there are only 10 employees, strange vehicles or people would be noticed and questioned.
 - iii. Guests, visitors and customers report to the office.

Inside Security

- 4. Does your facility have a food defense measures inside the establishment?
 - a. This plant is a very small and is not a high volume traffic area. Vehicles are noticed as are unfamiliar people.
 - i. Guests, visitors and customers report to the office. If entering the product area, they will adone the proper attire and are escorted by a plant employee.
 - ii. Local law enforcement can have access to the facilities up-to-date layouts if requested.
 - iii. Suspicious packages would be noticed by owner or employees as it would be something "out-of-place".
 - iv. Knives and tools are accounted for after before and after every shift, everyday. Cleaning chemicals are accounted for everyday at time of use (chlorax) as are restricted ingredients.
 - 1. Example, because this is a small facility, the processing manager would notice if nitrites packages were missing.

2. Areas that are tagged or contaminated are isolated by shutting the door to that particular room.

5. Are controls for the following systems restricted to prevent unauthorized persons?
 - a. This plant is a very small and is not a high volume traffic area. Vehicles are noticed as are unfamiliar people.
 - i. This facility does not have air conditioning, disinfection systems or centralized chemical systems.
 - ii. Other systems within the building, ie. Heating, electricity and propane are within the utility closet. They are not locked, but unattended persons would be noticed. Employees have no use in that closet unless instructed by owner for maintenance. Excess traffic in this area would be noticed.
 - iii. The water supply is routinely tested by the county and the well is located with-in the fenced area of the property.

6. Does your plant collect and analyze samples in-house for microbiological, chemical or physical hazards?
 - a. This plant is a very small and is not a high volume traffic area. Vehicles are noticed as are unfamiliar people.
 - i. No, all samples are sent to an outside lab.

7. Which of the following food defense procedures does you facility have in place for its in-plant laboratory facilities, equipment, and operations
 - a. Not Applicable to this facility

8. Does your facility use a computer system to monitor processing operations?
 - a. Yes, data is entered into the computer from hand-written forms at the beginning of each week from the previous week.

9. Does your facility have food defense procedures in place for its computer system?
 - a. This plant is a very small and is not a high volume traffic area. Vehicles are noticed as are unfamiliar people.
 - i. The computer system is in the office and used by our office manager. The computer itself is password protected and back-up disks are not kept at the plant.
 - ii. The computer is kept up-to-date with virus and spy-ware protections as well as firewall programs.

Slaughter and Processing Security

10. Which of the following food defense procedures does this facility have in place for its slaughter and processing operations?
- a. This plant is a very small and is not a high volume traffic area. Vehicles are noticed as are unfamiliar people.
 - i. The meat facility is fenced off into its own 10 acre lot. There is a cattle guard and gate at the entrance of the facility. The gate is rarely closed as there has been no cause to close this gate.
 - ii. The holding pens are not locked. The pens are built of good solid material and built in a manner that the livestock cannot escape or be easily set loose. The slaughter floor can be accessed from inside the building and only if the door to the pens is unlocked. If unlocked, employees are present in the area (slaughter days)
 - iii. We keep letters of guarantee and MSDS sheets on for products used in the plant.
 - iv. Upon receiving of items, they are checked to make sure they are the proper items, in good condition and no evidence of tampering.
 - v. This plant does not have irradiation equipment
 - vi. Detailed records for the current year and the previous year are kept at the plant. Earlier years are available within 48hrs upon request.

Storage Security

11. Which of the following food defense procedures does your facility have in place for its storage areas?
- a. This plant is a very small and is not a high volume traffic area. Vehicles are noticed as are unfamiliar people.
 - i. Coolers and storage areas have the ability to be locked but are not as this is not a current issue at this plant. We do not keep access logs to areas as this is a small facility and activity is noticed.
 - ii. This is the same for raw and finished product areas. Employees are aware of each other and their surroundings. Tampering would be noticed and questioned.
 - iii. Because we have one processing manager, they would notice if excess amounts of restricted ingredients (ie. Nitrites) were missing. Records of products made are available to review if an emergency arose and the amount of restricted ingredients used verses amount remaining was ever in question.

- iv. We keep records of current inventory for retail and inventory of custom orders. The inventory is checked regularly. If discrepancies are found, they are noted and resolved.
 - v. Labeling of all products is done in the processing room. They are printed as needed so there are no labels with product names lying around. Only the processing manager prints labels for products.
12. Which of the following food defense procedures does your facility have in place for the storage of hazardous materials / chemicals such as pesticides, industrial chemicals, cleaning materials, sanitizers and disinfectants?
- a. This plant is a very small and is not a high volume traffic area. Vehicles are noticed as are unfamiliar people.
 - i. Inside cleaning materials are kept in dry storage. This is usually only accessed after the days shift is over and cleaning starts. Cleaning with chemicals does not begin until after all food products are put away.
 - 1. Pesticides and other outdoor chemicals are not kept in the meat facility.
 - ii. We do not keep a running inventory of these supplies, but we do not keep excess. Employees would notice if there was missing materials.
 - iii. This room has a vented door
 - iv. The owner buys the materials on an as needed basis. Items that are shipped in are checked upon arrival.
 - v. We do not handle items that cannot be disposed of in the landfill.

Shipping and Receiving Security

13. Does your facility have food defense procedures in place for its shipping and receiving operations?
- a. This plant is a very small and is not a high volume traffic area. Vehicles are noticed as are unfamiliar people.
 - i. Unloading of livestock is closely watched and assisted by employees of this plant.
 - ii. Upon receiving of other shipped items, they are checked to verify they are the proper items ordered, in good condition and no evidence of tampering.
14. Does your facility have food defense procedures in place for handling outgoing shipments?
- a. This plant is a very small and is not a high volume traffic area. Vehicles are noticed as are unfamiliar people.

- i. We do not ship our food products out. Customers pick up their shipments and each shipment contains an invoice. All boxed product has been previously taped shut and leaves the plant that way. Once in customer care, the plant is no longer responsible for that product.

15. Which of the following food defense procedures does your facility have in place for handling incoming shipments?

- a. This plant is a very small and is not a high volume traffic area. Vehicles are noticed as are unfamiliar people.
 - i. The plant only has one loading/unloading dock and that is a chute for livestock. Employees would notice and question unscheduled unloading livestock and loading of live livestock.
 - ii. Suppliers send correspondence that a shipment has been sent and it's approximate arrival date. If it's being shipped, a tracking number is available and used to track the items being shipped.
 - iii. Delivery of livestock is previously arranged and unscheduled livestock must be approved through the owner and slaughter floor manager.
 - iv. Anything suspicious, altered or unscheduled would be held for verification.
 - v. Off-hour deliveries are not accepted unless owner is present.
 - vi. All incoming shipments are sealed. If a seal is broken or altered, the shipment will be carefully inspected.
 - vii. When an animal is in question, the animal is separated and identified for the state inspector.
 - viii. The feed and water facilities are protected to our best ability and cleaned weekly or more often if needed. Unusual activity or events would be noted and investigated.
 - ix. The plant takes in small shipments of animals; we do not have a transportations company.
 - x. The companies that our plant chooses to use for food items and non-food items are upstanding inspected facilities that provide us with all necessary paperwork to back up their safe product.

16. Does this facility allow returned goods, including returns of US exported products, to enter the plant?

- a. This plant is a very small and is not a high volume traffic area. Vehicles are noticed as are unfamiliar people.

- i. No this plant does not accept returned items. A refund is offered or we give out new product if a customer is unsatisfied with a product they currently have.

17. N/A

Water and Ice Security

18. Which of the following food defense procedures does your facility have in place for its water and ice supply?

- a. This plant is a very small and is not a high volume traffic area. Vehicles are noticed as are unfamiliar people.
 - i. The water supply is routinely tested by the city/county and the well is located with-in the fenced area of the property.
 - ii. The plant has an ice maker that is routinely cleaned and sanitized. Only specific ice scoops may be used in the ice machine. It is located in the processing area and not accessible to non-employees.
 - iii. Potable water lines are routinely inspected for tampering by owner.
 - iv. If a water supply emergency occurs local health officials will notify the plant or the plant would notify the local health officials.

Mail Handling Security

19. Which of the following food defense procedures does this facility have in place for mail handling security?

- a. This plant is a very small and is not a high volume traffic area. Vehicles are noticed as are unfamiliar people.
 - i. Mail handling is done in the office by the office manager and is not handled by an employee that will then handle food product.

Personnel Security

20. Which of the following food defense procedures does your facility have in place for ensuring that personnel adhere to the security requirements?

- a. This plant is a very small and is not a high volume traffic area. Vehicles are noticed as are unfamiliar people.
 - i. The plant does no conduct background checks on their employees.
 - ii. All employees receive security, HACCP, and safety training.
 - iii. Guest are all identified as they will be with an employee at all times
 - iv. Employees do not come and go from the plant unless previously scheduled. A lunch break is offered from 12:00 – 1:00pm and employees are allowed to leave for lunch.

- v. Entry into the plant after hours is restricted to the owner, office manager and the slaughter floor manager. Only they have keys.
- vi. Personal items are not allowed on the processing floor. Cameras, cell phones, etc are not allowed unless previously scheduled.
- vii. Company clothing is not removed from the plant as that clothing is laundered in house.

Implementing the Food Defense Plan

The Meat Company 101 strives to provide a safe environment for employees and food products.

- viii. A Food Defense Management team is in place and has been trained. Employees have also been trained in food defense and being aware of the surrounding. A review for the employees is done once a year or more often if needed. The more employees that are aware of our security measures, the better our security is.
- ix. We have updated emergency contact information posted in the office and in each bathroom/locker area and it is updated on an as-need basis.
- x. Procedures for responding to threats and actual incidences are also posted in the office. (See below for details)
- xi. Recall procedures are attached.

Procedures for responding to threats of product contamination

Identify the threat

- Take any suspicious activity or evidence of vandalism or sabotage seriously.
- Notify your chain of command immediately.
- Designate a response coordinator.
- Document what you see and keep notes as you go.

Immediately notify officials

- Contact local law enforcement
- Call your local Sheriff's office
- Alert other officials needed to protect public health

Assess and respond to the threat

- Inspect facilities, but do not disturb any evidence.
- Consult with local law enforcement to determine whether the threat is credible. If there is strong evidence of sabotage or terrorist activity, call the FBI at 406-443-3617
- Pull together a response team with expertise in the areas needed to resolve the situation.
- Determine whether there is biological or chemical contamination, or damage that disrupts supply.
- Consult with Department of Health to determine immediate actions needed to protect public health. Examples include notifying customers, isolating affected areas, shutting down critical facilities, and other advisories.
- If you suspect contamination, samples will be taken to a laboratory.
- Collect samples for future analysis and store them appropriately (for example, refrigerate).
- Conduct a full assessment of the situation, facilities, etc.
- Develop a communication strategy and communicate with affected people if necessary.

Procedures for responding to actual incidents of product contamination

- Discovery and response – the event is identified and confirmed, a response team is created, the team conducts an investigation, and detains, retains, and recalls contaminated products
- Decontamination– affected equipment and structures are decontaminated based on a specific decontamination plan
- Disposal – a specific plan for the disposal of the waste is developed and implemented
- Event clearance and termination.

Food Defense Plan Testing

Date	Area Tested	Results	Signature	Corrective Action Taken	Date Action Taken	Signature

Food Defense Plan Assessment and Revision

Date	Reason for Assessment	Signature

Emergency Contact Numbers

Person, Agency or Organization	Name of Contact	Phone Number
Plant Emergency Contact	Walter Smith	406-555-1234
Plant Meat Inspector	Gary Todd	406-461-0000
Plant Area IIC Supervisor	Ray Figgins	406-431-3137
Bureau Chief of Meat Insp.	Carol Olmstead	406-444-5293
Local Police Dept.		406-555-0001 or 911
Local Fire Dept		406-555-0002 or 911
Local FBI Office WMD	Sgt. James Dee	406-443-3617
City/County Health Dept.	Becky Smith	406-554- 7978
State Dept. of Health	Roger Michaels	406-444-0912

Other numbers on file with office manager

All Customers

All Suppliers

Recall Procedure

Pre-shipment Recall

1. *Procedures.*
 - a. Owner/manager will segregate affected product and determine the severity of deviation. If product deviation cannot be corrected in safe manner, product will be discarded.
 - b. All products from a lot, will be stamped with date and code.

2. *Implementing, Monitoring and Recordkeeping.* Any product that must be recalled will be done so by the date and code.

Shipment to Customer Recall

1. *Procedures*
 - a. If Meat Company 101 determines a problem after shipment of product, customers will be contacted about the product recall and of the recall procedure. The product affected will be discarded.
 - b. All products from a lot, will be identified.

Tracking Shipment Recall

1. *Procedures*
 - a. All products going out are documented by Meat Company 101 invoices, pre-shipment review, and by lot codes. Meat Company 101 will contact all customers on invoices.

Evacuation Procedures

- Leave the area quickly but in an orderly manner
- Exit out either the office door or the slaughter floor door
- Test doors for heat before opening them by placing the back of your hand against the door so you do not burn your palm and fingers. Do not open a hot door, but find another exit route.
- Report to the designated meeting place which is in the front parking lot
- Do no re-enter the building
- If cattle are in the pens and they are in sever danger the owner will close the gate at the cattle guard and let cattle out chute gate.

