

Contains Nonbinding Recommendations
 U.S. Food and Drug Administration
 Food Defense Self Assessment Tool
 for Retail Food Stores and
 Food Service Establishments

Retail Food Store and Food Service Establishment Operations:

*Mark each item either Y (Yes), N (No), N/A (Not Applicable) or DNK (Do Not Know).

Y N N/A DNK

Management

Y N N/A DNK

- Prepare for the possibility of tampering or other malicious, criminal, or terrorist events
- Assign responsibility for security to knowledgeable individual(s)
- Conduct an initial assessment of food security procedures and operations
- Have a crisis management strategy to prepare for and respond to tampering and other malicious, criminal, or terrorist actions, both threats and actual events, including identifying, segregating and securing affected products
- Plan for emergency evacuation, including preventing security breaches during evacuation
- Become familiar with the emergency response system in the community
- Make management aware of 24-hour contact information for local, state, and federal police/fire/rescue/health/homeland security agencies
- Make staff aware of who in management they should alert about potential security problems (24-hour contacts)
- Promote food security awareness to encourage all staff to be alert to any signs of tampering or malicious, criminal, or terrorist actions or areas that may be vulnerable to such actions, and to report any findings to identified management
- Have an internal communication system to inform and update staff about relevant security issues
- Have a strategy for communicating with the public

Investigation of suspicious activity

- Investigate threats or information about signs of tampering or other malicious, criminal, or terrorist actions
- Alert appropriate law enforcement and public health authorities about any threats of or suspected tampering or other malicious, criminal or terrorist actions

Evaluation program

- Evaluate the lessons learned from past tampering or other malicious, criminal, or terrorist actions and threats
- Review and verify, at least annually, the effectiveness of the security management program, revise accordingly

- Perform random food security inspections of all appropriate areas of the facility (including receiving and storage areas, where applicable) using knowledgeable in-house or third party staff
- Verify that security contractors are doing an appropriate job, when applicable

Human element – staff

Daily work assignments

- Know who is and who should be on premises, and where they should be located, for each shift
- Keep information updated

Identification

- Establish a system of positive identification and recognition, when appropriate
- Collect the uniforms, name tag, or identification badge when a staff member is no longer associated with the establishment

Restricted access

- Identify staff that require unlimited access to all areas of the facility
- Reassess levels of access for all staff periodically
- Limit staff access to non-public areas so staff enter only those areas necessary for their job functions and only during appropriate work hours
- Change combinations, rekeying locks, and/or collect the retired key card when a staff member who is in possession of these is no longer associated with the establishment, and additionally as needed to maintain security

Personal items

- Restrict the type of personal items allowed in non-public areas of the establishment
- Allow in the non-public areas of the establishment only those personal use medicines that are necessary for the health of staff (other than those being stored or displayed for retail sale) and ensure these personal use medicines are properly labeled and stored away from stored food and food preparation areas
- Prevent staff from bringing personal items into nonpublic food preparation for storage areas
- Provide for regular inspection of contents of staff lockers, bags, packages, and vehicles when on company property

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Training in food security procedures

- | | | | | |
|-----------------------|-----------------------|-----------------------|-----------------------|--|
| Y | N | N/A | DNK | |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Incorporate food security awareness, including information on how to prevent, detect, and respond to tampering or other malicious, criminal, or terrorist actions or threats, into training programs for staff, including seasonal, temporary, contract, and volunteer staff |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Provide periodic reminders of the importance of security procedures |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Encourage staff participation in security procedures |

Unusual behavior

- | | | | | |
|-----------------------|-----------------------|-----------------------|-----------------------|---|
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Watch for unusual or suspicious behavior by staff |
|-----------------------|-----------------------|-----------------------|-----------------------|---|

Staff health

- | | | | | |
|-----------------------|-----------------------|-----------------------|-----------------------|---|
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Be alert for atypical staff health conditions that staff may voluntarily report and absences that could be an early indicator of tampering or other malicious, criminal, or terrorist actions, and report such conditions to local health authorities |
|-----------------------|-----------------------|-----------------------|-----------------------|---|

Human element -- public

Customers

- | | | | | |
|-----------------------|-----------------------|-----------------------|-----------------------|--|
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Prevent access to food preparation and storage and dishwashing areas in the non-public areas of the establishment, including loading docks |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Monitor public areas, including entrances to public restrooms for unusual or suspicious |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Monitor the serving or display of foods in self-service areas |

Other (Non-Employees, Non-customer) visitors

- | | | | | |
|-----------------------|-----------------------|-----------------------|-----------------------|--|
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Restrict entry to the non-public areas of the establishment |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Ensure that there is a valid reason for all visits to the non-public areas of the establishment before providing access to the facility - beware of unsolicited visitors |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Verify the identity of unknown visitors to the non-public areas of the establishment |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Inspect incoming and outgoing packages and briefcases in the non-public areas of the establishment for suspicious, inappropriate or unusual items, to the extent practical |

Facility

Physical security

- | | | | | |
|-----------------------|-----------------------|-----------------------|-----------------------|---|
| Y | N | N/A | DNK | |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Protect non-public perimeter access with fencing or other deterrent, when appropriate |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Secure all doors, windows, roof openings/hatches, vent openings, ventilation systems, utility rooms, ice manufacturing and storage rooms, loft areas and trailer bodies, and bulk storage tanks for liquids, solids and compressed gases to the extent possible |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Use metal or metal-clad exterior doors to the extent possible when the facility is not in operation, except where visibility from public thoroughfares is an intended deterrent |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Minimize the number of entrances to non-public areas |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Account for all keys to establishment |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Monitor the security of the premises using appropriate methods |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Minimize, to the extent practical, places in public areas that an intruder could remain unseen after work hours |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Minimize, to the extent practical, places in non-public areas that can be used to temporarily hide intentional contaminants |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Provide adequate interior and exterior lighting, include emergency lighting, where appropriate, to facilitate detection of suspicious or unusual activity |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Implement a system of control vehicles authorized to park in the non-public parking areas |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Keep customer, employee, and visitor parking areas separated from entrances to food storage to non-public areas, where practical |

Storage and use of poisonous and toxic chemicals (for example, cleaning and sanitizing agents, pesticides) in non-public areas

- | | | | | |
|-----------------------|-----------------------|-----------------------|-----------------------|---|
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Limit poisonous and toxic chemicals in the establishment to those that are required for the operation and maintenance of the facility and those that are being held stored or displayed for retail sale |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Store poisonous and toxic chemicals as far away from food handling and storage areas as practical |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Limit access to and securing storage areas for poisonous and toxic chemicals that are not being held for retail sale |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Ensure that poisonous and toxic chemicals are properly labeled |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Use pesticides in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Know what poisonous and toxic chemicals should be on the premises and keeping track of them |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Investigate missing stock or other irregularities outside a normal range of variation and alert local enforcement and public health agencies about unresolved problems, when appropriate |

Operations

Incoming products

- | | | | | |
|-----------------------|-----------------------|-----------------------|-----------------------|---|
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | Use only known and appropriately licensed or permitted (where applicable) sources for all incoming products |
|-----------------------|-----------------------|-----------------------|-----------------------|---|

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Y N N/A DNK

- Take steps to ensure that delivery vehicles are appropriately secured
- Request that the transporters have the capability to verify the location of the load at any time, when practical
- Establish delivery schedules, not accepting unexplained, unscheduled deliveries or drivers, and investigate delayed or missed shipments
- Supervise off-loading of incoming materials, including off hour deliveries
- Reconcile the product and amount received with the product and amount ordered and the product and amount listed on the invoice and shipping documents; take into account any sampling performed prior to receipt
- Investigate shipping documents with suspicious alterations
- Inspect incoming products and product returns for signs of tampering, contamination, or damage or "counterfeiting", when appropriate
- Reject suspect food
- Alert appropriate law enforcement and public health authorities about evidence of tampering, "counterfeiting," or other malicious, criminal or terrorist action

Storage

- Have a system for receiving, storing and handling distressed, damaged, and returned products, and products left at checkout counters, that minimizes their potential for being compromised
- Keep track of incoming products, materials in use, salvage products, and returned products
- Investigate missing or extra stock or other irregularities outside a normal range of variability and reporting unresolved problems to appropriate law enforcement and public health authorities, when appropriate
- Minimize reuse of containers, shipping packages, cartons, etc., where practical

Food service and retail display

- Display poisonous and toxic chemicals for retail sale in a location where they can be easily monitored
- Periodically check products displayed for retail sale for evidence of tampering or other malicious, criminal, or terrorist action, to the extent practical

Y N N/A DNK

- Monitor self-service areas for evidence of tampering or other malicious, criminal, or terrorist action

Access to computer systems

- Restrict access to critical computer data systems to those with appropriate clearance
- Eliminate computer access when a staff member is no longer associated with the establishment
- Establish a system of traceability of computer transactions
- Review the adequacy of virus protection systems and procedures for backing up critical computer-based data systems
- Validate the computer security system

If a retail food store or food service establishment operator suspects that any of his/her products that are regulated by the FDA have been subject to tampering, "counterfeiting," or other malicious, criminal, or terrorist action, FDA recommends that he/she notify the FDA 24-hour emergency number at 301-443-1240 or call their local FDA District Office. FDA District Office telephone numbers are listed at: http://www.fda.gov/ora/inspect_ref/iom/iomoradir.html. FDA recommends that the operator also notify local law enforcement and public health agencies.