

AFTER ACTION REPORT

OPERATION NORTH STAR

MAY 18, 2006

FOOD SAFETY AND INSPECTION SERVICE

FINAL REPORT

JUNE 23, 2006

Background

The U.S. Department of Agriculture (USDA) is actively addressing the need to maintain the safety and defense of the country's food supply. During a crisis, it is critical that the Department be able to efficiently and effectively coordinate with its counterparts at the state and local level, as well as within other Federal agencies and the private sector. On May 18, 2006, USDA's Food Safety and Inspection Service (FSIS) conducted Operation North Star in Minneapolis, MN and at FSIS headquarters in Washington, DC. The Operation North Star Exercise focused on the roles of Federal, state, and local government agencies and the food industry to work together to detect, respond to, and recover from a non-routine emergency incident. Emphasis was placed on a team approach to incident response, coordination, integration of capabilities, problem identification, and resolution through preparation, response, recovery, and multi-agency coordination. The exercise offered FSIS the opportunity to test and validate operating guidelines and directives for responding to a non-routine incident involving the intentional adulteration of food products within an FSIS inspected facility. The ultimate goals were:

- Minimizing suffering, loss of life, and personal injury
- Minimizing damage to property
- Minimizing disaster- or emergency-related service disruption, which would have an adverse impact on the government, the communities, and the businesses and their employees, reputation, and product brand names

This report identifies areas of strength and weakness that were observed during the exercise and offers recommendations for improvement.

Objectives

Operation North Star focused on enhancing the coordination and communication between FSIS, other regional Federal agencies, state and local government agencies, and industry stakeholders. The objectives for Operation North Star were to clarify roles and responsibilities and improve coordination and communication among:

- FSIS Program Offices and associated field staffs
- State and local public health and emergency response agencies
- Primary Federal emergency response organizations
- Private sector stakeholders in the food industry

Strengths of the Exercise – What Worked Well?

The exercise involved strong participation by the following stakeholder groups:

- FSIS field and Headquarters personnel from OFO, OPEER, OPHS, OIA, OM, OPPEP, OPAEO and OFDER
- Staff from FDA, FBI, EPA, and FEMA Region V
- Minnesota government agencies, including the Minnesota Department of Agriculture, Minnesota Department of Health, and the University of Minnesota, National Center for Food Protection and Defense
- Hennepin County, Minnesota and the City of Minneapolis
- Food industry, including Cargill, Hormel, Jennie-O, Kroger, Minnesota Turkey Growers/Broilers & Egg Association, National Turkey Federation and Sunny Fresh Foods
- Consumer groups, including the Center for Science in the Public Interest

Participants were actively engaged in the exercise. There was open dialogue and good networking among stakeholder groups.

Areas for Improvement – What Did Not Work Well in the Exercise?

As a result of difficulty in communications between the FSIS Minneapolis District Office and FSIS Headquarters, the state did not coordinate with FSIS on the public health message and the recall announcement. FSIS Headquarters participants suggested that in the case of a real incident, OPAEO would be in direct communication with the state.

Some participants expressed the concern that the timeline of the exercise unfolded too quickly to allow them to test their emergency response procedures; too many injects too quickly.

The scenario did not address sampling and laboratory issues that could be significant in an actual incident.

Participants from the FBI and the USDA OIG felt that additional details should have been provided about the investigative aspects of the scenario. However, the emphasis of the exercise was on public health protection response actions rather than the criminal investigation.

Incident Command System (ICS) Issues

What triggered each stakeholder group to organize into or participate in a multi-agency incident command structure?

- Local/County – adverse health effects addressed by local government; fatalities escalated response to bring in Minnesota Department of Health and the state EOC

- State – EOC activated based on extent of public health impact
- FSIS – FSIS ICS structure activated in response to multiple local and state government agency inquiries. In addition, the EMC recommended FSIS ICS activation after the state stood up an EOC.
- Other federal – triggers vary by agency; i.e., FBI - reports of product tampering: FDA - Regional Office contacted by state EOC; Regional Office notifies FDA Headquarters and Office of Criminal Investigations
- Industry – Closed –circuit TV evidence of tampering caused industry to send representatives to participate in the FSIS ICS structure and the state EOC as subject matter experts.
- Consumer groups – public health outbreak; media attention. Observed that some federal agencies were waiting for state action to get involved.

What was the effectiveness of the ICS structure for this exercise?

- Some stakeholder groups stated that activation of an ICS, assumption of ICS functions by assigned personnel, and liaison with other stakeholder groups had the potential to produce staffing problems.

Who was in charge?

- There was some confusion by industry about who was in charge at different phases in the exercise, although processing industry representatives typically work with FSIS.
- FSIS initially took control of the product and worked with industry to obtain product distribution information.
- Initial Incident Command was at the local level.
- The state assumed command once the EOC was activated.
- The FBI would take charge of the criminal investigation but not public health protection.

Were decisions coordinated among stakeholder groups?

- Federal agency participants felt that there was generally good interaction among the stakeholder groups, whereas, the local participants felt that there was confusion among stakeholders, e.g., industry was not involved in the decision making process.
- Decision making was influenced by the multiple jurisdictions involved; various agencies have responsibility for products at different points in the supply chain.
- Industry participants felt that decisions were coordinated. For example, industry developed a plan for decontamination of the processing facility that was coordinated with FSIS.

Other Observations

- Both the FBI and consumer group participants stated that public health concerns should always take priority over criminal investigations concerns.
- FSIS should consider active onsite participation by OPAAEO and involve Public Information Officers (PIOs).
- Government agencies should bring industry and media, as appropriate, into their response structures as quickly as possible.
- Local and state Emergency Management Agencies should participate in these exercises. .
- Industry participants commented that there needs to more active engagement by government agencies in order to facilitate the timely sharing of relevant information.

Recommendations

Consider alternatives for visualization of common posting information, such as the use of PowerPoint slides or maps for public health data.

Consider not pre-scheduling EMC calls to better simulate FSIS emergency action response coordination between Headquarters and the District Office.

FSIS OPAAEO should explore the possibility of deploying a Public Information Officer to the field to better assist the FSIS Incident Commander in communication with other stakeholder groups and Headquarters.

Better coordination and communication among all stakeholder groups, particularly federal and state response agencies, is needed.

Government at all levels needs to work with industry on response actions.

With regard to sampling in future exercises, consider including patient urinary analysis, which would provide information about threat agents more quickly.

There is a need for better coordination among government, industry, and consumer group stakeholders in the development of press releases and communication with the media and consumers.

Consideration also should be given to the communication challenges presented by the possible limited English proficiency of some stakeholder group members and consumers.