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FSIS Security Guidelines for Food Processors; Notice of Availability; Request for Public Comments

Docket No. 02-023N

The American Association of Meat Processors (AAMP) is pleased to submit the following comments to USDA-Food Safety and Inspection Service concerning the FSIS Security Guidelines for Food Processors.

The Association is an international trade association whose members are located in the United States, Canada and several foreign countries. AAMP's members include meat and poultry processors, slaughterers, wholesalers, retailers, home food service companies, caterers, and suppliers and consultants to the meat and poultry processing industries. Most of the Associations members are small, very small and medium-sized businesses.

The Guidelines were developed by FSIS to help USDA and "Equal-to" State Inspected meat and poultry plants to identify ways to strengthen their security plans to protect against acts of bioterrorism, an increasing concern for all businesses in the United States, in light of the attack against America on September 11, 2001. In creating the Security Guidelines, FSIS indicated that plants may already be aware of, and be adopting, security guidelines from other government agencies, industry organizations, and experts from the private sector. The Agency also noted that these guidelines are not mandatory, but are voluntary.

Because many large companies have a great deal of expertise when it comes to maintaining security at plants, or have already-existing guidelines designed for large companies that they can use, it was AAMP's understanding that the guidelines being created for FSIS would be geared to the needs of small, very small and medium-sized businesses.

But after AAMP's Meat Inspection/Governmental Affairs Committee reviewed the USDA booklet, the Association came to the conclusion that unfortunately, these guidelines would not be very helpful to small businesses. Instead, for the most part, they seemed geared more to the needs of larger firms.

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During the creation of the Guidelines, AAMP participated in telephone conference calls with Dr. Perfecto Santiago, Assistant Deputy Administrator, Program Development Staff, Office of Policy, Program Development and Evaluation, FSIS.

The Association voiced its concerns about the necessity of creating a document that would be helpful to small businesses. AAMP also invited Dr. Santiago to make a presentation about security at its 2002 National Convention during July in Reno, Nevada. Dr. Santiago presented a very good program at the AAMP Convention.

But the Guidelines remain as they were created. When the members of AAMP's Meat Inspection/Governmental Affairs Committee discussed the issue of the Guidelines, they felt that the Guidelines were not particularly helpful to small businesses, and in some cases, displayed a great ignorance of how small businesses work.

Here are a few examples:

In the section sealing with outside security, the Guidelines make the assumption that all plants are located in isolated areas, surrounded by large wire fences, and that plant boundaries should be secured to prevent unauthorized entry, with "No Trespassing" signs posted. They say that the integrity of the plant perimeter should be monitored for signs of suspicious activity or unauthorized entry.

The Guidelines go on to say that "all access points into the establishment should be secured by guards, alarms, cameras or other security hardware, consistent with national and local fire and safety codes."

There is also a recommendation that incoming and outgoing vehicles be inspected, and that entry into establishments should be controlled by requiring positive identification (e.g. picture IDs, sign-in and sign-out at security or reception, etc. Parking areas for visitors or guests should be situated at a safe distance from the main facility, with vehicles of authorized visitors, guests and employees marked with decals.

Many small plants have retail stores attached to them. The last thing plant owners want to do is to bar members of the public from coming in and patronizing these retail stores. So they don't want to prevent people from parking at these plants and stores, and they certainly don't want to make it harder for them to come inside to purchase items than the retail grocery store down the street.

In many small meat and poultry plants, the workers there may be part of the family that owns the plant. Or if not related to the plant owner, there are a small-enough number of employees that "everyone knows everyone." In such cases that are quite common, ID badges, guards and security cameras would hardly be necessary. Positive identification/recognition of all plant employees with decals would likely not be needed.

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When FSIS recommends a food security management team be identified for each plant, there probably already is one: the plant owner. Also, many of the recommendations for "inside security" is taken care of by the plant owner.

A suggestion that an updated daily or shift roster of plant personnel be maintained and distributed to plant supervisors is probably not necessary. In a small plant, people know "who's supposed to be working when and where."

There were a few good recommendations that would be helpful to any plant, no matter its size. They include:

Shipping and receiving security, that outgoing and incoming shipments be sealed with tamper-proof numbered seals, and that shipping documents with suspicious alterations should be thoroughly investigated.

The suggestion that there be prior notice for off-hours deliveries and require the presence of an authorized individual to verify and receive the shipment, is a good one.

Another good suggestion is that the FSIS Inspector-in-Charge be notified immediately when animals with unusual behavior and symptoms are received at the plant.

At AAMP, we think it would be helpful for the Guidelines to be altered to take into account the working conditions, the size and the needs of the thousands of small, very small and medium-sized meat and poultry plants that are under USDA and "equal-to" state inspection across the United States.

We appreciate the opportunity to make these comments and to address this issue.

Sincerely,



Bernard F. Shire, Director
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cc: Russell Wenzel, AAMP President