



December 2, 2002

FSIS Docket Clerk  
Docket No 02-023N  
Room 102, Cotton Annex  
300 12th Street, SW  
Washington, DC 20250-3700

02-023N  
02-023N-2  
Rhona S. Applebaum

6

NATIONAL  
FOOD  
PROCESSORS  
ASSOCIATION

**[Docket No. 02-023N] FSIS Security Guidelines for Food Processors;  
67 Federal Register 54404; August 22, 2002**

Dear Ms. Riley:

The National Food Processors Association (NFPA) is the voice of the \$500 billion food processing industry on scientific and public policy issues involving food safety, food security, nutrition, technical and regulatory matters and consumer affairs. NFPA's three scientific centers, its scientists and professional staff represent food industry interests on government and regulatory affairs and provide research, technical services, education, communications and crisis management support for the association's U.S. and international members. NFPA members produce processed and packaged fruit, vegetable, and grain products, meat, poultry, and seafood products, snacks, drinks and juices, or provide supplies and services to food manufacturers.

1350 I Street, NW  
Suite 300  
Washington, DC 20005  
202-639-5900

NFPA continues to be the leader in assisting the food industry to organize and conduct food security assessments and in providing industry with both the tools and practices for implementing appropriate measures designed to help protect against intentional threats to industry products, personnel and property. As with all intentional threats to the food supply, reducing the probability of actual occurrence is part of the crisis management process. To that end, efforts are made to achieve zero probability, while realizing that nothing is ever 100%. Nevertheless, all stakeholders must be engaged to deter, prevent and protect to the extent possible, with the understanding that "reason must rule." Clearly guidance documents, such as those developed by FSIS and FDA, can assist the industry in taking appropriate actions to prevent, to the extent possible, intentional threats to the food supply. We appreciate the opportunity to comment on the FSIS Security Guidelines for Food Processors.

**Specific Comments on FSIS Security Guidelines**

WASHINGTON, DC  
DUBLIN, CA  
SEATTLE, WA

We commend FSIS for the speed with which they developed and distributed these guidelines for the meat, poultry and egg industry. Generally, we find the guidelines to be comprehensive and clearly written. We offer the following suggestions to clarify certain points.

In the introductory letter from Linda Swacina, it is noted that the guidelines are voluntary and that plants may adopt measures suggested by many different sources. We encourage FSIS to also indicate that not all the recommendations or guidelines will be applicable to all facilities. This is particularly true for very small establishments, where practices such as overt positive identification (name tags, picture ids, etc.), maintaining lists of personnel with restricted access at the security office, etc., which are common in larger establishments, are unnecessary in establishments where all employees are known to one another.

In order to maximize flexibility of these guidelines it would be useful to have a food security goal for each section. The facility would then apply those guidelines applicable to the establishment's business in meeting the intended goal. Moreover, there are numerous places where industry would benefit by an explanation for why a recommendation is being made. Such an explanation would assist establishments in identifying whether a recommendation is appropriate for them or whether another approach might achieve the same result. Our philosophy for ensuring companies increase their security is to explain what they need to do and why, and leave the "how" to the individual company, since procedures and practices to achieve the desired outcome will differ depending on the facility. Providing companies with the necessary flexibility is key to achieving enhanced security throughout the food chain.

### **Food Security Plant Management**

In the second bullet it is suggested that the food security plan be developed using established risk management principles. Given the current use of the term risk management in the food industry with respect to food safety, it would be better to refer to "crisis management principles;" this would be consistent with the reference to intentional threats, product tamperings and evacuation plans in the subsequent sentence.

In the next bullet, we recommend changing "corrective action" to "procedures" so the sentence reads, "Procedures followed in all cases of product tampering should ensure that adulterated or potentially injurious products do not enter commerce."

In the third bullet on page 2 it is not clear why entry points need to be specifically designated for emergency personnel. The nature of the emergency would likely dictate not only the point of entry, but also the point of departure or exit. If the point is to identify entry points that would not be locked, we recommend you reword the sentence as follows: "Entry points available to emergency personnel should be identified in the plan, as should all departure and exit points."

We recommend adding a bullet that indicates the need for confidentiality of food security plans, such as "Food security plans should be maintained in a secure location and shared on a 'need-to-know' basis."

### **Outside Security**

On page 4 the guidelines indicate that parking areas for visitors should be situated at a safe distance from the main facility. It is common in industry to provide visitor parking close to the office door for convenience. A clear goal describing the intent of this recommendation would help facilities assess what constitutes a safe distance or whether this is even practical for the establishment.

The guidance further suggests that vehicles of visitors, guests and employees be clearly marked with placards, decals, etc. It should be noted that the intent is to identify vehicles that belong at the location and deter bombing attempts. Again, we emphasize the need to explain why the recommendation/guideline is being suggested (per page 2 of these comments). A brief explanation for why the guideline is being put forward is necessary not only for education purposes, but also to assist in changing behaviors—the key to increasing security all around. Effective communication that results in behavioral changes—in this instance toward actions on security—is the true mark of any guideline’s success. This is the key whether guidelines are targeted to security or healthy lifestyles. Information in the absence of behavioral changes is only words; action is the critical element.

### **General Inside Security**

In the second bullet, we recommend you add “steam” to the list of items where controls should be restricted and controlled.

### **Slaughter and Processing Security**

In the third bullet on traceability, we recommend the sentence be modified as follows “...to ensure the capability for at least one level of trace-back and trace-forward of all raw materials and finished products.”

In the second bullet on page 7, we recommend you modify the statement restricting access to production or holding areas to plant employees and FSIS inspection personnel to include accompanied visitors. There are clearly visitors that will need to have access to these areas, including FDA and state inspection personnel for some facilities, outside maintenance personnel, auditors, etc.

### **Mail Handling Security**

We recommend you include the website for the US Post Office Guidelines on mail handling:

United States Postal Service Mail Center Security Guide  
<http://www.usps.com/cpim/ftp/pubs/pub166/welcome.htm>

## **Personnel Security**

The third bullet indicates that new hires, including seasonal, temporary and contract workers, should be subject to background checks before hiring. This may not be practical in many instances, especially when hiring seasonal workers from other countries. Thus, an additional statement should be added: "Where this is not practical, such personnel should be under constant supervision and their access to areas of the plant may be more restricted."

## **NFPA Food Security Survey**

NFPA conducted a survey of members with respect to food security practices, including their opinions of the FSIS Security Guidelines. Approximately 65 companies responded to the survey; 33 of these were large companies (>500 employees) and 30 were small companies (10-499 employees). Not all of the respondents produce FSIS-regulated products. The numbers reported below for respondents refer to those responding to a specific question; not all companies responded to all questions.

More than 90% of the respondents feel it is important for government and industry to adopt security measures to prevent acts of deliberate contamination. Approximately 63% of 63 respondents were aware of the USDA FSIS Security Guidelines; 68% of 38 respondents indicated the guidance was practical for the company's facilities, and 61% of 44 respondents indicated they used the guidance in the company security plan.

When asked about specific sections of the guidelines, most of those who had an opinion (15-20 respondents, depending on the section), found the guidance for that section to be workable; however, 20% found that guidance on workforce security and employee background checks was unworkable.

About half of all respondents would like to see government share information on risks and threats with industry and provide education and training on security matters. Other information FDA/USDA could provide that would be useful in a company's food security efforts include examples of how other plants handle specific issues or better practices seen in industry; specifics on the types of biological and chemical risks we should be addressing; and information about transportation and distribution risks. Respondents commented about the importance of keeping guidance practical, using common sense.

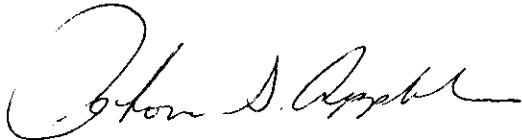
**Docket No. 02-023N**

**December 2, 2002**

**Page 5**

We hope our comments will be useful to you in revising your food security guidance. If NFPA or its members can assist you in any way on future efforts, please do not hesitate to contact us.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rhona S. Applebaum". The signature is fluid and cursive, with a large initial "R" and "A".

Rhona S. Applebaum, Ph.D.  
Executive Vice President  
Scientific and Regulatory Affairs

cc: Dr. Perfecto Santiago