

**Food Processing Establishment
Self-Assessment Checklist
for
Food Security**



Ohio Department of Agriculture

Division of Food Safety

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Industry Self-Assessment Checklist for Food Security

On January 30, 2004 *Homeland Security Presidential Directive 9* was issued which addressed the defense of United States agriculture and food. The purpose of this directive establishes a national policy to defend the agriculture and food system against terrorist attacks, major disasters, and other emergencies. The backgrounder of this document states:

“The United States agriculture and food systems are vulnerable to disease, pest, or poisonous agents that occur naturally, are unintentionally introduced, or are intentionally delivered by acts of terrorism. America's agriculture and food system is an extensive, open, interconnected, diverse, and complex structure providing potential targets for terrorist attacks. We should provide the best protection possible against a successful attack on the United States agriculture and food system, which could have catastrophic health and economic effects.”

It is vital that all food processing establishments, and all warehouse, distribution, import, and export establishments take steps to ensure the security of their operations. The Ohio Department of Agriculture Division of Food Safety created this self-assessment instrument from information received from the U.S. Food and Drug Administration (FDA) and USDA's Food Safety and Inspection Service (FSIS) to provide a tool for food processing establishments to assess the extent to which they have secured their operations. The contents of the instrument are based primarily on the food security guidelines that FDA and FSIS have published. These documents are available at <http://www.cfsan.fda.gov/~dms/fsterr.html> and http://www.fsis.usda.gov/Food_Security_&_Emergency_Preparedness/index.asp. These guidelines identify security measures that food processing establishments can adopt to enhance the security of their operations.

We strongly encourage you to use this tool to assess your business security and to establish, if you have not done so already, a food security plan.

The checklist consists of the following (9) sections:

- I. Food Security Plan Management
- II. Outside Security
- III. Inside Security
- IV. Processing Security
- V. Storage Security
- VI. Shipping and Receiving Security
- VII. Water and Ice Supply Security
- VIII. Mail Handling Security
- IX. Personnel Security

To use the checklist, read each question under each section and check the response that best describes the food security practice in the establishment. If a question is not applicable, check “N/A.” For example, if an establishment only conducts only import/export inspection activities, then questions related to processing would not apply. A “Yes” response for every question is desirable but not expected due to the layering of certain security measures. A “No” answer however, should trigger a critical thought process in establishment operators on what may be a vulnerability or weakness in their food security strategy. They must make risk management decisions on additional security measures they may need to put in place at the particular operational sector/area of the establishment covered by the “No” response. Resources/websites specific to a section or question are shown at the corresponding section/question throughout the checklist for quick and easy reference. “N/A” responses should be reviewed periodically to validate them against current operations.

The final outcome of this self-assessment should provide establishments with a relative measure of overall security of their operations and guide them in the development and/or revision of their food security strategies.

I. FOOD SECURITY PLAN MANAGEMENT

A food security plan is a written document developed using established risk management procedures and consists of specific standard operating procedures for preventing intentional product tampering and responding to threats or actual incidents of intentional product tampering.

1. Does this establishment have a written food security plan?
 - Yes
 - No [GO TO QUESTION 3]

2. Which of the following procedures, plans, or information are either included in the food security plan or have been put in place as a result of the food security plan? (Check “Yes” or “No” for each item.)

Plan Management	YES	NO
Is there a designated person or team to implement and oversee the food security plan?		
Are members of the food security management team trained in all provisions of the food security plan?		
Are periodic drills conducted on the operational elements of the food security plan?		
Are regular food security inspections conducted to verify key provisions of the food security plan?		
Is the security plan reviewed (and revised if necessary) periodically?		

Plan Management	YES	NO
Are the details of food security procedures kept confidential?		
Is the emergency contact information for local, state, and federal government homeland security authorities and public health officials included in the security plan? State contact list: www.whitehouse.gov/homeland/contactmap.html		
Is the above contact information periodically reviewed and updated?		
Is there an established liaison between plant officials and the local homeland security officials and other law enforcement officials?		
Is there an established relationship between the establishment and the appropriate analytical laboratories for possible assistance in investigation of product tampering cases?		
Are procedures for responding to threats of product tampering included in the plan?		
Are procedures for responding to actual incidents of product tampering detailed in the plan? http://www.state.tn.us/agriculture/security/fsig.html		
Are communication procedures for notifying law enforcement, agriculture and public health officials when a food security threat is received or when evidence of actual product tampering is observed included in the plan?		
Are procedures in the plan for corrective action in cases of product tampering to ensure that adulterated or potentially injurious products do not enter commerce?		
Are procedures in the plan for safe handling and disposal of products contaminated with chemical or biological agents?		
Are employees encouraged to report signs of possible product tampering or breaks in food security system (e.g., award system)?		
Are evacuation procedures in the security plan? Visit www.osha.gov/dep/evacmatrix/index.html for guidance material provided by the U.S. Department of Labor, Occupational Safety and Health Administration		
Are procedures in place to restrict access to the facility during an emergency to authorized personnel only?		
Are designated entry points for emergency personnel clearly marked?		
Does the establishment have a documented recall plan?		
Are procedures in the recall plan reviewed and updated as necessary?		
Do recall procedures ensure segregation and disposition of recalled products?		

II. OUTSIDE SECURITY

3. Which of the following security procedures does this establishment have in place for the exterior of this establishment? (Check “Yes” or “No” for each procedure.)

Outside Security (Exterior)	YES	NO
Are the plant’s boundaries and grounds secured to prevent entry by unauthorized persons (e.g., by locked fence or gate)?		
Are “No Trespassing” signs posted at plant’s boundaries?		
Are the plant’s boundaries monitored for signs of suspicious activity or entry (e.g. by guard or camera)?		
Is there sufficient outside lighting to allow detection of unusual activities on any part of the establishment outside premises during non-daylight hours?		
Do emergency exits have self-locking doors and/or alarms?		
Is positive identification required to control entry of visitors to the plant (e.g., picture IDs or sign-in/sign-out at entrance)?		
Is an updated list of establishment personnel with open or restricted access to the establishment maintained at the security office or another secure location?		

4. Are the following secured with locks, seals, or sensors at all times to prevent entry by unauthorized persons? (Check “Yes” or “No” for each item, or “N/A” if the item is not applicable.)

Outside Security (Entry)	YES	NO	N/A
Outside doors and gates?			
Windows?			
Roof openings?			
Vent openings?			
Trailer (truck) bodies?			
Tanker truck hatches?			
Railcars?			
Bulk storage tanks?			

5. Which of the following security procedures does this establishment have in place for vehicles entering the establishment? (Check “Yes” or “No” for each procedure.)

Outside Security (Vehicles)	YES	NO
Are incoming private vehicles (e.g., employees or visitors) inspected for unusual cargo or activity?		
Are outgoing private vehicles (e.g., employees or visitors) inspected for unusual cargo or activity?		
Are incoming commercial vehicles (e.g., delivery trucks) inspected for unusual cargo or activity?		
Are outgoing commercial vehicles (e.g., delivery trucks) inspected for unusual cargo or activity?		
Are incoming tanker truck shipments checked for documentation of chain of custody prior to loading?		
Are employee vehicles identified using placards, decals, or some other form of visual identification?		
Are authorized visitor/guest vehicles identified using placards, decals, or some other form of visual identification?		

III. GENERAL INSIDE SECURITY

6. Which of the following security procedures does this establishment have in place within the interior of this establishment? (Check “Yes” or “No” for each procedure, or “N/A” if the procedure is not applicable.)

Inside Security (General)	YES	NO	N/A
Is emergency lighting provided in the establishment?			
Is active surveillance of the inside facility and operations maintained?			
Are emergency alert systems tested periodically?			
Are the locations of controls for emergency alert systems clearly marked?			
Are all restricted areas (i.e., areas where only authorized employees have access) within the plant clearly marked?			

Inside Security (General)	YES	NO	N/A
Are visitors, guests, and other non-establishment employees (e.g., contractors, salespeople, truck drivers) restricted to non-product areas unless accompanied by an authorized establishment employee?			
Are updated plant layout schematics provided at strategic and secured locations?			
Are procedures in place to check toilets, maintenance closets, personal lockers, and storage areas for concealed packages?			
Is a daily inventory of tools and utensils (e.g., knives) used conducted?			
Is a daily inventory of keys to secured areas of the facility conducted?			
Are ventilation systems constructed in a manner that provides for immediate isolation of contaminated areas or rooms?			

7. Are the central controls for the following restricted (e.g., by locked door/gate or limiting access to designated employees) to prevent access by unauthorized persons? Check “Yes” or “No” for each item, or “N/A” if the item is not applicable. www.cdc.gov/niosh/bldvent/2002-139.html

Inside Security (Utilities)	YES	NO	N/A
Heating, Ventilation, and Air Conditioning systems?			
Propane Gas?			
Water systems?			
Electricity?			
Disinfection systems?			
Clean-in-place (CIP) systems?			

8. Does this establishment collect and analyze samples in-house?

- Yes
 No [GO TO QUESTION 10]

9. Which of the following security procedures does this establishment have in place for its in-plant laboratory facilities, equipment, and operations? (Check “Yes” or “No” for each procedure, or “N/A” if the procedure is not applicable [e.g., this establishment does not use live cultures of pathogenic bacteria].)

Inside Security (Laboratory)	YES	NO	N/A
Is access to the in-plant laboratory facilities restricted to authorized employees? (e.g., by locked door, pass card, etc.)			
Is a procedure in place to control receipt of samples received from other establishments?			
Is a procedure in place to receive and securely store reagents?			
Is a procedure in place to control and dispose of reagents?			
Is a procedure in place to receive and securely store live cultures of pathogenic bacteria?			
Is a procedure in place to dispose of live cultures of pathogenic bacteria?			

10. Does this establishment use a computer system to monitor processing operations?

- Yes
 No [GO TO QUESTION 12]

11. Which of the following security procedures does this establishment have in place for its computer systems? (Check “Yes” or “No” for each procedure.)

Inside Security (Computer)	YES	NO
Is the access to the system password-protected? http://www.umich.edu/~policies/pw-security.html		
Are firewalls built into the computer network?		
Is the system using a current virus detection system?		

IV. PROCESSING SECURITY

12. Which of the following security procedures does this establishment have in place for its processing operations? (Check “Yes” or “No” for each procedure, or “N/A” if the procedure is not applicable [e.g., this establishment does not mix or batch ingredients].)

Processing Operations	YES	NO	N/A
Is access to product production areas restricted to establishment employees and regulatory inspection personnel only?			
Is the mixing and batching of product and ingredients and other operations where large amounts of exposed product are handled continuously monitored?			
Are lines that handle and transfer products, water, oil, or other ingredients monitored to ensure integrity?			
Is the packaging integrity of ingredients examined for evidence of tampering before use?			
Are records maintained to ensure the capability to trace-back raw materials to suppliers?			
Are records maintained to ensure the capability to trace-forward finished products to vendors?			

*“N/A” Response possible in above section for Import, Export, Warehouse and Distribution Establishments.

V. STORAGE SECURITY

13. Which of the following security procedures does this establishment have in place for its storage areas? (Check “Yes” or “No” for each procedure, or “N/A” if the procedure is not applicable [e.g., this establishment does not use restricted ingredients].)

Storage Security (Food Products)	YES	NO	N/A
Is access to raw product storage areas, including holding coolers restricted (e.g., by locked door/gate) to designated employees?			
Is an access log maintained for raw product storage areas?			
Is access to ingredient storage areas restricted to designated employees only?			
Is an access log maintained for ingredient storage areas?			

Storage Security (Food Products)	YES	NO	N/A
Is access to finished product storage areas restricted to designated employees?			
Is access to external storage facilities restricted to designated employees only?			
Are silo storage tanks for raw product and other bulk ingredients (syrup, oils, etc.) maintained under lock and seal?			
Are silo storage tanks for bulk finished products maintained under lock and seal?			
Are silo storage tanks for bulk inedible products maintained under lock and seal?			
Are periodic security inspections of storage facilities (including temporary storage vehicles) conducted?			
Are records maintained on facility security inspections results?			
Is the inventory of restricted ingredients (i.e., nitrites, etc) reconciled against the actual use of such ingredients on a daily basis?			
Are product labels and packaging held in a secure area to prevent theft and misuse?			
Is the inventory of finished products regularly checked for unexplained additions and withdrawals from existing stock?			

14. Which of the following security procedures does this establishment have in place for the storage of hazardous materials/chemicals such as pesticides, industrial chemicals, cleaning materials, sanitizers, and disinfectants? (Check “Yes” or “No” for each procedure.)

Storage Security (Hazardous Materials)	YES	NO
Is the access to inside and outside storage areas for hazardous materials/chemicals such as pesticides, industrial chemicals, cleaning materials, sanitizers, and disinfectants restricted to designated employees?		
Are hazardous material/chemical storage areas separated from production areas of plant?		
Is a daily inventory of hazardous materials/chemicals maintained?		
Are discrepancies in daily inventory of hazardous materials/chemicals immediately investigated?		

Storage Security (Hazardous Materials)	YES	NO
Are the storage areas for hazardous materials/chemicals constructed and safely vented in accordance with national or local building codes?		
Is a procedure in place to receive and securely store hazardous chemicals?		
Is a procedure in place to control disposition of hazardous chemicals?		

VI. SHIPPING AND RECEIVING SECURITY

Visit: <http://www.fsis.usda.gov/oa/topics/transportguide.htm>

15. Which of the following security procedures does this establishment have in place for its shipping and receiving operations? (Check “Yes” or “No” for each procedure, or “N/A” if the procedure is not applicable [e.g., no tanker trucks on premises].)

Shipping And Receiving Operations	YES	NO	N/A
Are trailers on the premises maintained under lock and/or seal when not being loaded or unloaded?			
Are tanker trucks on the premises maintained under lock and seal when not being loaded or unloaded?			
Is the loading and unloading of vehicles transporting raw materials, finished products, or other materials used in food processing closely monitored?			

16. Which of the following security procedures does this establishment have in place for handling outgoing shipments? (Check “Yes” or “No” for each procedure, or “N/A” if the procedure is not applicable [e.g., no tanker trucks on premises].)

Shipping And Receiving Security (Outgoing)	YES	NO	N/A
Are outgoing shipments sealed with tamper-evident seals?			
Are the seal numbers on outgoing shipment documented on the shipping documents?			
Are tanker trucks inspected for indications of the presence of potential threat agents prior to loading liquid products?			
Are records maintained of the above inspections of tanker trucks?			
Are chain-of-custody records maintained for tanker trucks?			

17. Which of the following security procedures does this establishment have in place for handling incoming shipments? (Check “Yes” or “No” for each procedure, or “N/A” if the procedure is not applicable.)

Shipping And Receiving Security (Incoming)	YES	NO	N/A
Are vendors of packaging materials and labels selected with consideration of food security measures implemented by vendors?			
Is access to loading docks controlled to avoid unverified or unauthorized deliveries?			
Is advance notification from suppliers (by phone, e-mail, or fax) required for all incoming deliveries?			
Are suspicious alterations in the shipping documents immediately investigated?			
Are all deliveries verified against the roster of scheduled deliveries?			
Are unscheduled deliveries held outside facility premises pending verification?			
Are off-hour deliveries accepted?			
If off-hour deliveries are accepted, is prior notice of the delivery required?			
If off-hour deliveries are accepted, is the presence of authorized individual to verify and receive the delivery required?			
Is the integrity of internal compartments in the truck, lot packaging, or in-transit security checks for less-than-truckload (LTL) or partial load shipments of materials verified?			
Requires incoming shipments of raw product, ingredients, and finished products to be sealed with tamper-evident seals			
Are incoming shipments of raw product, ingredients, and finished products required to be sealed with numbered seals (and documented in the shipping documents) that are verified prior to entry?			
Is the integrity of incoming shipments of raw product, ingredients, and finished products checked at receiving dock for evidence of tampering?			
Are transportation companies selected with consideration of the procedures companies have in place to safeguard the security of products being shipped?			
Are transportation companies selected with consideration of background checks conducted on drivers and other employees who have access to products?			

Shipping And Receiving Security (Incoming)	YES	NO	N/A
Are ingredient suppliers selected with consideration of food security measures implemented by the suppliers?			
Are vendors of compressed gas selected with consideration of food security measures implemented by vendors?			

18. Does this establishment allow returned goods, including returns of U.S. exported products, to enter the plant?

- Yes
 No [GO TO QUESTION 20]

19. Which of the following security procedures does this establishment have in place for returned goods? (Check “Yes” or “No” for each procedure.)

Shipping And Receiving Security (Returned Goods)	YES	NO
Are all returned goods examined for evidence of possible tampering before salvage or use in rework?		
Are records maintained of returned goods used in rework?		
Are returned goods reworked/examined at a separate designated location in the establishment to prevent potential cross-contamination of products?		

VII. WATER AND ICE SECURITY

Visit <http://cfpub.epa.gov/safewater/watersecurity/index.cfm>; www.epa.gov/region1/eco/drinkwater/pdfs/drinkingH2Ofactsheet.pdf for guidance material from the U.S. Environmental Protection Agency, Water Security.

20. Which of the following security procedures does this establishment have in place for its water and ice supply? (Check “Yes” or “No” for each procedure, or “N/A” if the procedure is not applicable.)

Water And Ice	YES	NO	N/A
Is access to water wells restricted? (e.g., by locked door/gate or limiting access to designated employees)			
Is access to ice-making equipment restricted?			
Is access to ice storage facilities restricted?			

Water And Ice	YES	NO	N/A
Is access to storage tanks for potable water restricted?			
Is access to water reuse systems restricted?			
Are potable water lines periodically inspected for possible tampering?			
Are non-potable water lines inspected for possible tampering (leaks, connected to potable lines, etc.)?			
Have arrangements been made with local health officials to ensure immediate notification of the plant if the potability of the public water supply is compromised?			

VIII. MAIL HANDLING SECURITY

21. Which of the following security procedures does this establishment have in place to ensure mail-handling security?

Mail Handling	YES	NO	N/A
Is mail-handling activity conducted in a separate room or facility away from in-plant food production/processing operations?			
Are mail-handlers trained to recognize and handle suspicious pieces of mail using U.S. Postal Service guidelines? http://www.usps.com/news/2001/press/serviceupdates.htm			

IX. PERSONNEL SECURITY

22. Which of the following security procedures does this establishment have in place for ensuring that establishment personnel adhere to the security requirements?

(Check “Yes” or “No” for each procedure, or “N/A” if the procedure is not applicable [e.g., the establishment does not use contractors].)

Personnel	YES	NO	N/A
Are background checks conducted on new permanent employees prior to hiring?			
Are background checks conducted on new temporary, seasonal, and contract employees prior to hiring?			
Do all plant employees receive training on security procedures as part of their orientation training?			

Personnel	YES	NO	N/A
Are procedures in place to ensure positive identification/recognition of all establishment employees?			
Are identification procedures in place to ensure the positive identification/recognition for temporary employees and contractors (including construction workers, cleaning crews, and truck drivers) in the establishment?			
Are procedures in place to screen employees entering the plant during working hours?			
Are procedures in place to screen entry of employees into the plant during non-working hours?			
Are procedures in place to screen the entry of contractors into the plant during working hours?			
Are procedures in place to screen entry of contractors into the plant during non-working hours?			
Are procedures in place to restrict temporary employees and contractors (including construction workers, cleaning crews, and truck drivers) to areas of plant relevant to their work?			
Are procedures in place to ensure clear identification of personnel with their specific functions/assignments (e.g., colored garb)?			
Is an updated shift roster of establishment employees distributed to supervisors at the start of each shift?			
Is a policy in place on what personal items may and may not be allowed inside the plant and within production areas?			
Are announced and unannounced inspections of employees' lockers conducted?			
Are employees and/or visitors restricted on what they can bring (cameras, etc.) into plant?			
Are employees allowed to remove company-provided clothing or protective gear from the premises?			

Other security web links:

<http://www.whitehouse.gov/news/releases/2004/02/20040203-2.html>

<http://www.ohioagriculture.gov/pubs/divs/hsec/hsec-index.stm>

<http://www.homelandsecurity.ohio.gov/hls.asp>

<http://www.cfsan.fda.gov/~dms/secguid3.html>

<http://www.cfsan.fda.gov/~dms/secguid6.html>

http://www.asy.faa.gov/Risk/SSHHandbook/Chap15_1200.pdf

<http://www.fmi.org/isac/>