

**Retail Food Establishment
Self-Assessment Checklist
for
Food Defense**



Ohio Department of Agriculture

Division of Food Safety

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Industry Self-Assessment Checklist for Food Defense

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 retail food 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 retail food establishments to assess the extent to which they have secured their operations. The contents of the instrument are based primarily on the food defense 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 and retail food establishments can adopt to enhance the defense 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 defense plan.

The checklist consists of the following (10) sections:

- I. Food Defense Plan Management
- II. Outside Security
- III. Inside Security
- IV. Food Production and Preparation Security
- V. Storage Security
- VI. Shipping and Receiving Security
- VII. Water and Ice Supply Security
- VIII. Mail Handling Security
- IX. Personnel Security
- X. Testing and Evaluation of the Food Defense Plan

To use the checklist, read each question under each section and check the response that best describes the food defense practice in the retail food establishment. If a question is not applicable, check “N/A.” For example, if an establishment only conducts 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 retail food establishment operators on what may be a vulnerability or weakness in their food defense 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 retail food 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. Scheduled periodic reviews of your facility should be conducted to remain aware of your security posture and any changes due to changing operation and environments.

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 defense strategies.

For the purposes of this document “retail food establishment” means a grocery store or other similar facility that is licensed by local health departments under Chapter 3717 of the Ohio Revised Code.

I. FOOD DEFENSE PLAN MANAGEMENT

A food defense 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 retail food establishment have a written food defense plan?
 - Yes
 - No [GO TO QUESTION 3]

2. Which of the following procedures, plans, or information are either included in the food defense plan or have been put in place as a result of the food defense 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 defense plan? | | |
| Are members of the food defense management team trained in all provisions of the food defense plan? | | |
| Are regular food defense inspections conducted to verify key provisions of the food defense plan? | | |

| Plan Management | YES | NO |
|--|-----|----|
| Is the defense plan reviewed (and revised if necessary) periodically? | | |
| Are the details of food defense procedures kept confidential? | | |
| Is the emergency contact information for local, state, and federal government homeland security authorities and public health officials included in the defense 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 retail food establishment officials and the local homeland security officials and other law enforcement officials? | | |
| Is there an established relationship between the retail food 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 defense system (e.g., award system)? | | |
| Are evacuation procedures in the defense 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 retail food establishment during an emergency to authorized personnel only? | | |
| Are designated entry points for emergency personnel clearly marked? | | |
| Does the retail food establishment have a documented recall plan? | | |
| Are procedures in the recall plan reviewed and updated as necessary? | | |

| Plan Management | YES | NO |
|---|------------|-----------|
| 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 grounds groomed and well maintained with clear sight lines? | | |
| Are the retail food establishment’s exterior areas monitored for signs of suspicious activity or entry (e.g. by security guard or CCTV [Closed Circuit TV])? | | |
| 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? | | |
| Do outside vendors, contractors or similar visitors check in upon entry? | | |
| Is positive identification required for outside vendors and delivery personnel, contractors, or similar types of visitors to control entry and access to the retail food establishment non-sales areas (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? | | |
| Are vehicle impeding bollards protecting ground level doors and windows? | | |

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? | | | |

| Outside Security (Entry) | YES | NO | N/A |
|---------------------------------|------------|-----------|------------|
| Vent openings? | | | |
| Trailer (truck) bodies? | | | |

III. INSIDE SECURITY

5. 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 and does it meet NFPA (National Fire Protection Act) requirements? | | | |
| Is active surveillance of the inside facility and operations maintained through CCTV (Closed Circuit TV)? | | | |
| Are emergency alert systems tested periodically? | | | |
| Are the locations of controls for emergency alert systems clearly marked? | | | |
| Is access to back rooms, storage and work areas monitored or controlled; and are “no access” signs posted? | | | |
| Are visitors, guests, and other non-establishment employees (e.g., contractors, salespeople, truck drivers) restricted to non-sales areas unless accompanied by an authorized establishment employee? | | | |
| Is a retail food establishment floor plan available on site in a secure location? | | | |
| Are evacuation routes posted in accordance with OSHA or local regulations? | | | |
| Are procedures in place to routinely check toilets, maintenance closets, personal lockers, and storage areas for concealed people or packages? | | | |
| 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 such as the kitchen, meat preparation, or similar places? | | | |

6. 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? | | | |

7. Does this establishment use a computer system to operate Point of Sale or other systems, or to manage data base information critical to retail food establishment performance?

- Yes
 No [GO TO QUESTION 9]

8. 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? | | |
| Are operation systems, virus protection, and firewall programs updated regularly? | | |

IV. FOOD PRODUCTION AND PREPARATION SECURITY

9. Which of the following security procedures does this establishment have in place for its food production and preparation 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].)

| Food Production and Preparation Operations | YES | NO | N/A |
|--|------------|-----------|------------|
| Is access to product production and preparation areas limited to establishment employees, escorted visitors, 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

10. 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 periodic security inspections of storage facilities (including temporary storage vehicles) conducted? | | | |
| Are records maintained on facility security inspections results? | | | |
| 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? | | | |

11. 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 establishment? | | |
| Is an inventory of hazardous materials/chemicals maintained? | | |
| Are discrepancies in the inventory of hazardous materials/chemicals immediately investigated? | | |
| Are the storage areas for hazardous materials/chemicals separated from stock, storage or production/preparation areas? | | |
| 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>

12. 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 deliveries monitored and controlled by the retail food establishment staff? | | | |

13. 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 of product being transferred between retail food establishments sealed with tamper-evident seals? | | | |
| Are the seal numbers on outgoing shipments documented on the shipping documents? | | | |

14. 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 incoming delivery trucks inspected for unusual cargo or activity? | | | |
| Is there a staging of incoming deliveries prior to entry into the retail food establishment? | | | |
| Are vendors of packaging materials and labels selected with consideration of food defense measures implemented by vendors? | | | |
| Is access to loading docks controlled to avoid unverified or unauthorized deliveries? | | | |

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

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.

15. 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 incoming water lines and 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? | | | |
| Is access to storage tanks for potable water restricted? | | | |
| Are potable water lines periodically inspected for possible tampering? | | | |
| Have arrangements been made with local health officials to ensure immediate notification of the retail food establishment if the public water supply is compromised? | | | |

VIII. MAIL HANDLING SECURITY

16. 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 the retail food establishment food processing, preparation and storage areas? | | | |
| 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

17. 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? | | | |

| Personnel | YES | NO | N/A |
|--|------------|-----------|------------|
| Do all retail food establishment employees receive training on security procedures as part of their orientation training? | | | |
| 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 establishment during business hours and non-business hours? | | | |
| Are procedures in place to screen the entry of contractors into the establishment during business hours and non-business hours? | | | |
| Is access to non-sales areas of the retail food establishment limited to those individuals performing work functions, such as temporary employees, construction workers, cleaning crews, truck drivers, and contractors? | | | |
| Are procedures in place to ensure clear identification of personnel with their specific functions/assignments via uniform or insignia? | | | |
| Does the retail food establishment management team know which employees are on the premises at any given time? | | | |
| Is a policy in place on what personal items may and may not be allowed inside the retail food establishment and within production areas? | | | |
| If employees are provided with lockers for personal items, are announced and unannounced inspections of employees' lockers conducted? | | | |
| Does the retail food establishment have a policy regarding items (cameras etc.) that employees or visitors may be bring into the retail food establishment? If so, are signs posted addressing this policy? | | | |
| Are employees allowed to remove company-provided clothing or protective gear from the premises? | | | |
| Are employees instructed on the proper methods to obtain complete and specific information on reports of tampering, illness, or other threats? | | | |

X. EVALUATION AND TESTING OF A FOOD DEFENSE PLAN

| Evaluation and Testing | YES | NO |
|--|------------|-----------|
| Are periodic drills or similar table-top exercises conducted on the operational elements of the food defense plan? | | |
| Do you regularly assess the security of your overall retail food establishment utilizing the self-assessment checklist tool or through the performance of a self-inspection? | | |

| Evaluation and Testing | YES | NO |
|--|-----|----|
| Do you feel you have created a greater awareness of security issues with your staff? (If your answer is No to this question, please contact your local health department.) | | |

Other defense 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/>