



Food Safety and Inspection Service
U.S. DEPARTMENT OF AGRICULTURE

FOOD DEFENSE GUIDANCE FOR LARGE-SCALE SPECIAL EVENTS

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INTRODUCTION

The U.S. Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS) is the public health regulatory agency in USDA whose mission is to protect the public's health by ensuring the safety of the Nation's commercial supply of meat, poultry, and egg products. FSIS ensures food safety through the authorities of the Federal Meat Inspection Act, the Poultry Products Inspection Act, and the Egg Products Inspection Act, as well as humane animal handling through the Humane Methods of Slaughter Act. FSIS conducts food defense surveillance activities for large-scale events in coordination with other Federal, state, tribal, territorial, and local partners to protect consumers during these events and their associated activities.

The Federal Bureau of Investigation (FBI) is the lead Federal agency for responding to threats from weapons of mass destruction (WMD). The FBI works to detect and prevent threats involving the use of chemical, biological, nuclear, radiological and explosive weapons. The food supply and commercial facilities infrastructure continue to be potential targets of such attacks. By coordinating with the food and commercial facilities sector, the FBI attempts to mitigate this threat.

PURPOSE

This guidance is primarily designed to assist food service vendors and venue management that host special events (such as sporting events and conventions) at large venues with practical food defense measures. These guidelines provide a list of indicators and best practices that can prevent intentional contamination of meat, poultry, and egg products during loading, transportation, unloading, storage, handling, and preparation. It is also important for both venue (i.e., security) and vendor management to understand the benefits of implementing food defense best practices. Venue management should work collaboratively with their food vendors to identify all possible threats, examine the risks, and employ effective measures to prevent intentional contamination. Implementation of food defense practices is voluntary relative to FSIS regulated products. FSIS recognizes that not all guidelines in this document will be practical or applicable for all events.



BACKGROUND

An incident of intentional contamination of the food supply could have significant public health and economic impacts. Protecting the food supply requires the collective understanding of roles, and robust coordination and communication with public and private stakeholders (e.g., the private sector, public health, regulatory, law enforcement and other first responders) to plan for, prevent, detect, and respond to intentional foodborne incidents. Venues where mass gatherings are held, such as arenas, stadiums, cruise ships, and convention centers, typically have large-scale food service operations. Given the significant physical capacity and number of potential attendees, events taking place at these venues may be considered an ideal soft target to an adversary. Implementation of food defense best practices in these venues will help to minimize the likelihood and reduce the impact of such an incident. Weapons of Mass Destruction Coordinators are assigned to each of the FBI's 56 field offices to assist in investigations regarding the acquisition and/or use of WMD. WMD Coordinators build relationships with partners in law enforcement and the private sector. The goal of these relationships is to promote information sharing and ensure the FBI has an early warning of emerging WMD threats.

FSIS Compliance Investigators from the Office of Investigation, Enforcement and Audit, are a resource and point of contact available to you regarding food defense surveillance activities. Compliance Investigators are responsible for carrying out the statutory authorities of the Agency through surveillance, investigation, product control, and enforcement outside of federally inspected facilities to ensure public health protection throughout commerce for the consumer. Compliance Investigators are also engaged in in-commerce surveillance activities related to food defense including verification that meat, poultry, and egg products are wholesome and not adulterated. See the "Local Contacts" section on page 8 for more information.

WHAT IS FOOD DEFENSE?

Food defense is the protection of food products from intentional contamination or adulteration where there is an intent to cause public health harm or economic disruption. Food defense and food safety systems protect consumers but are distinct programs:

- Food safety - focuses on the protection of food products from unintentional or accidental adulteration (e.g., sanitation or cross-contamination issues).
- Food defense - focuses on protection from intentional adulteration (e.g., disgruntled employees, terrorist or activist groups with the intention to contaminate food).

Implementing food defense measures is a good business practice to:

- Reduce the risk of someone intentionally contaminating the food supply.
- Minimize the impact of an incident.
- Help protect your business.
- Protect public health.

YOUR ROLE IN FOOD DEFENSE

FSIS has conducted numerous vulnerability assessments on its regulated products that indicate the food supply could be vulnerable to intentional contamination. It is well known that the greatest threat is the insider threat such as from disgruntled employees and outside contractors (i.e., cleaning crews), as well as international and domestic terrorists and hoaxers.

The threat landscape and potential sources of intentional adulteration continue to evolve and increase in complexity, which could have an impact on our food safety systems, public health, and the economy. As the first line of defense, your observations are critical. If something seems suspicious, report it! (See the “Local Contacts” section on page 8 for more information.)



TRIGGERS AND WARNING BEHAVIORS

Food facilities of all types are susceptible to a range of threats from both outside and inside personnel. Unauthorized/unrestricted access is a key vulnerability. Personnel screening policies are critical to identify those with the intent to harm. No single behavior alone should be considered for determining concern. All behaviors and circumstances should always be considered in totality.

Potential Indicators of a Threat

Evaluate all situations in context. Consider the totality of the circumstances observed. With any potential threat of terrorist or criminal activity, thoughtful and well-reasoned prevention plans can effectively mitigate risk. Potential indicators of a threat include:

- Falsifying credentials.
- Unusual or unauthorized work schedules.
- Workplace harassment or violence.
- Intolerance of criticism.
- Compulsive and destructive behavior.
- Manipulation of colleagues.
- Threats via social media.
- Significant changes in behavior.
- New food or beverage vendor or supplier seeking your business prior to high security event.
- Atypical staff absences and/or substitutions (could be an early indicator of previous tampering or malicious activity).
- Unusual activities at shipping and receiving
 - Suspicious substances (e.g., liquids, powders, odors, etc.) leaking from transport vehicles or found in containers.
 - Inconsistent shipping documents.
- Inquiries about security status, personnel, and vehicles, or attempts to acquire official vehicles, uniforms, or identification/access cards.
- Theft of employee uniforms or badges.
- Unattended items such as backpacks or boxes left in unauthorized places.
- Unusual photographing or video recording of the facility.
- Conducting surveillance of self-service areas (e.g., salad bars, condiment areas, and open bulk containers).
- Attempt to gain access to restricted or unauthorized areas.
- Unscheduled deliveries.
- New driver on route.
- Driver refuses to present driver's license or other credentials.
- Driver not familiar with facility delivery protocols.
- Illegally parked or unattended vehicles at the facility.
- Employees/individuals in unauthorized areas.
- Unscheduled maintenance/service.



TIPS TO MITIGATE THREATS

Implementing food defense best practices in large venues, especially for mass gatherings, will help minimize the likelihood and reduce the impact of an intentional incident. The food service vendor (i.e., large contracted and independent vendors) and venue management should work together on implementation of mitigations as their respective responsibilities may vary at different venues.

Implement a Food Defense Plan

- A food defense plan is a tool that helps a food vendor/supplier identify measures to protect food and food processes from intentional harm.
- Venue management should consider requiring that all food service providers implement a food defense plan.
- A food defense coordinator should be designated and responsible for implementing the food defense plan.
- A vulnerability assessment should be conducted by each food service vendor to understand where vulnerabilities exist in the vendor's facility and to identify mitigation measures to reduce risks. For example, food service providers should identify all parties that have access to the food (i.e., any outside contractors or entities) and determine how to restrict unauthorized access.
- Develop a written food defense plan to document the measures implemented to mitigate the risk of intentional contamination. This also helps you keep track of what to test and evaluate.
 - The plan should also include established emergency procedures regarding recalled food, holding and securing suspect food, and the immediate closing of concession stands.
- Include a strategy for communicating with the public and media.
- Encourage or require suppliers and transporters to have a food defense plan.
- It is also important to include your local law enforcement, public health, regulatory agencies and first responders in prevention and response planning.

Characteristics of Your Food Defense Plan

- Written - document the plan and have senior management sign it.
- Implemented - perform preventive measures to ensure a base level of common-sense security.
- Tested - regular check and practice security measures.
- Reviewed and maintained - review the plan at least annually and revise as needed.



Recommended Security Measures

Outside Security

- Use only known and approved vendors/delivery providers for all incoming products. Create a vendor list to identify properly vetted suppliers and delivery drivers.
- Establish delivery schedules and standardize procedures for supervising food delivery and pickup.
- All food and beverage deliveries should be recorded with product, date, time, vehicle license number, company, and driver name (verify and record ID information from driver's license).
- Verify drivers have appropriate license or identification/credentials (is supplier using company driver or third-party delivery service?).
- Inspect all packages/containers for tampering (e.g., torn packaging tape, open boxes, broken seals).
- If you suspect tampering, refuse the food, and notify the supplier or distributor.
- Require supplier use a method to ensure security (e.g., locks or seals) of food shipments.
- Keep exterior doors locked, as appropriate, to prevent access to food preparation and storage areas, including delivery areas.
- Ensure all food concessions are reasonably secured, inspected, monitored, and licensed.
- Monitor janitorial and facility maintenance services related to food service operations.
- Appropriately secure open containers of food or ingredients in storage or preparation areas.
- Lock food storage and preparation areas when not in use.
- Check incoming products for evidence of tampering (e.g., damaged/leaking packages, evidence of torn or resealing of packages).
- Monitor for evidence of tampering or limit/eliminate uncontrolled self-service areas (e.g., salad bars, condiment areas, open bulk containers).
- Close all condiment containers to prevent tampering.

Inside Security

- Ensure all food service vendors and employees comply with the appropriate local public health agency or department regulations.

(Recommended Security Measures Continued on Page 7)



Recommended Security Measures (Continued)

- ❑ Prevent staff from bringing personal items, other than medicines, into food preparation/storage areas.
- ❑ Limit access to and lock cleaning chemical storage areas; investigate missing stock or other irregularities.
- ❑ Control access to water source used in food preparation and handling.
- ❑ Control access to food preparation and storage areas by delivery personnel, patrons, and employees (and contractors, such as pest control providers).

Personnel Security

- ❑ Conduct background checks on all food service employees.
- ❑ Require appropriate food safety training for all food handlers.

- ❑ Train employees to recognize suspicious activity, food contamination, and unusual employee behaviors, and how to properly report such activity. Provide periodic reminders.
- ❑ Supervise food service employees during the preparation and distribution of food; if surveillance cameras are used, train personnel to interpret video footage to identify potential security issues.
- ❑ Devise credential systems (possibly color coded) for employees indicating their access to restricted areas and purpose of activity.
- ❑ Collect applicable uniforms, name tags, key cards, and identification badges when an employee is no longer associated with the venue or vendor.

WHAT YOU SHOULD DO IF AN INCIDENT OCCURS

- Food service vendors should contact their management and venue security officer/management.
- They should notify local law enforcement and provide them with the following details:
 - Time and location of incident.
 - Description of incident.
 - Suspect description.
 - Vehicle description and license plate number, if applicable.
- Do not touch suspicious items/containers.
- Have a security guard remain in the area with the suspect product until law enforcement arrives to take appropriate actions.
- Move everyone away to a safe distance from the affected area and prevent others from approaching.
- Ensure that the person who found the item or witnessed the incident remains on site to brief law enforcement.
- Ensure venue and/or food vendor management (or designees) notify law enforcement to swiftly investigate threats, signs of tampering, or other malicious actions.

RESOURCES

FSIS has developed many tools and training resources, some in multiple languages, to assist you in implementing food defense measures.

Find them at:

www.fsis.usda.gov/FoodDefense. If you have questions about these guidelines, please contact FSIS at **FoodDefense@usda.gov**.

LOCAL CONTACTS

Identify local authorities and first responders in advance so you will know whom to contact. Fill in the appropriate contact information below to be prepared.

If you suspect a patron has consumed contaminated food:

- Dial 911 if it is an emergency situation.
- Contact your local public health department: _____

In the event of an actual or suspected tampering incident, notify:

- Local Law Enforcement: _____
- Venue/Event Security Officer: _____
- Local Federal Bureau of Investigation Office: _____
(www.fbi.gov/contact-us/field-offices)
**If you witness suspicious activity, you can also submit a "Tip" at <https://tips.fbi.gov>.*
- Local USDA-FSIS Compliance and Investigations Division Offices:

(www.fsis.usda.gov/contact-us/fsis-offices)

- Other Key Local Contacts: _____
