

# Known Food Defense Weaknesses

- Not part of traditional food safety inspection process
- Limited food defense training opportunities
- Operators not challenging unfamiliar persons for identification
- Security vs. courtesy

# 2012 Vulnerability Field Study

- Imitated imposter inspectors
- Covert “intrusion” test
- Non-public entrances
- Unfamiliar inspectors
- No Visible ID
- 24 sites: restaurant institutional, grocery
- Local law enforcement informed

# 2013 Field Vulnerability Study

## **Documented on survey:**

- Access to non-public areas?
- Were we asked to identify ourselves?
- Were we escorted?
- How long did we spend unidentified in non-public areas?

Reviewed results with Gen. Mgr.

# 2013 Vulnerability Field Study

- Only 1 food facility asked for formal I.D. badge
- Not a single grocery or restaurant asked for formal I.D.
- Approximately 530 “covert” total (Almost 9 hrs) in non-public areas: Potential opportunities for contamination.
- Only 2 of 24 facilities had all non-public exterior entrances secured
- Only 1 grocery had a formal food defense plan
- Never escorted
- Results anonymous

# Workshops

- Held 2 workshops (east and west)
- 218 retail food industry attendees
- Presented findings
- Brainstormed easy, low cost solutions to **address weaknesses**
- Attendees received flash drive with info



# 2013 Lessons Learned (Response)

- Post large signs stating that all visitors to non-public areas are required to sign-in and obtain a visitor's badge
- Empower employees stop unfamiliar person(s) and escort to management for I.D./verification
- Call the Health Dept. (or other) for verification
- Manager or employee escort...
- Secure non-public exterior doors (self-closing/locking)
- Always report suspicious behavior
- CCBH should include food defense in trainings

# Protecting the Food Supply

## FOOD DEFENSE



### What are the threats?

Intentional biological, chemical or physical contamination

Intruders with access to food and equipment

### How can we detect them?

Be alert

Ask questions, especially if your gut tells you something is wrong

### How can we prevent them?

Train staff; equip buildings

Never prop open doors

Increase employee awareness and have a policy for handling disgruntled employees or vendors

Protect against deliberate or intentional acts of contamination or tampering

Locate known food defense weaknesses with increased security

CUYAHOGA COUNTY  
BOARD OF HEALTH

YOUR TRUSTED SOURCE FOR PUBLIC HEALTH INFORMATION

5550 Venture Drive Parma, Ohio 44130  
216-201-2000 [www.ccbh.net](http://www.ccbh.net)

### Tips to prepare against threats to food security:

Require guests to wear a visitor's badge.

Always have a manager or employee escort visitors in non-public areas.

Ask for identification if visitors neglected to obtain a badge and escort them back to the sign-in area for badging.

Reward employees who enforce the visitor badge policy.

Create a "catalog" of I.D.'s for frequent vendors and visitors.

Install self-closing, self-locking exterior doors and never allow doors to be propped open.

Equip your building with security cameras and adequate lighting.

Train employees to contribute to your organization's security.

Alert management if customers, employees or vendors are disgruntled.

Encourage employees to alert management if something seems wrong or if they are worried about risks to food or other employees.

When in doubt, throw it out; never risk serving contaminated food.



# Republican National Convention (RNC)

- Created additional malicious adulteration concerns, as terrorism is often politically motivated
- >50,000 visitors
- Attract attention-seekers...
- An act of terrorism (including one involving the retail food supply) could redirect international attention from RNC to attackers' cause



# MI Grocery Malicious Adulteration

The screenshot shows a web browser displaying the MDARD website. The browser's address bar shows the URL: [http://www.michigan.gov/mdard/0,4810,7-125-1572\\_](http://www.michigan.gov/mdard/0,4810,7-125-1572_). The search bar contains the text "Michigan grocery store contamination". The website header includes navigation links: MDARD Home, Contact Us/File a Complaint, Public Meeting Notices, Media Resources, Online Services, and MI.gov. The main content area features the MDARD logo and the text "Department of Agriculture & Rural Development". A search bar is visible on the right side of the header. The main content area displays a press release titled "Advisory: Consumers Urged to Throw Away Potentially Contaminated Foods". The press release is dated 10/12/15 and is categorized under "Press Releases for MDARD". The text of the press release states: "MDARD immediately responded to this threat to food safety. MDARD sent inspectors to each implicated store to assess the foods, review inventory records and cleaning practices, examine video footage taken at the stores and re-enforce food security and food safety protocols. Additionally, MDARD contacted the corporate offices and store managers to notify them of a possible food issue in the stores. If potential risks to food safety were identified, food was placed under seizure, removed from sale, and immediately disposed of." The right sidebar contains a "Related Content" section with three items: "Bayside Best Beans honored by State with 'Agriculture Exporter of the Year' Award", "MDARD presented a Platinum Hall of Fame Award for donating 18,000 lbs. of food", and "New Bovine Tuberculosis Zoning Order eliminating Bovine TB Program Requirements for three Northern Michigan Counties".

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## Advisory: Consumers Urged to Throw Away Potentially Contaminated Foods

Agency: Agriculture and Rural Development

### Update on the ongoing investigation of intentional contamination of food at grocery stores in Michigan

MDARD immediately responded to this threat to food safety. MDARD sent inspectors to each implicated store to assess the foods, review inventory records and cleaning practices, examine video footage taken at the stores and re-enforce food security and food safety protocols. Additionally, MDARD contacted the corporate offices and store managers to notify them of a possible food issue in the stores. If potential risks to food safety were identified, food was placed under seizure, removed from sale, and immediately disposed of.

#### Related Content

- Bayside Best Beans honored by State with "Agriculture Exporter of the Year" Award
- MDARD presented a Platinum Hall of Fame Award for donating 18,000 lbs. of food
- New Bovine Tuberculosis Zoning Order eliminating Bovine TB Program Requirements for three Northern Michigan Counties

# Integrated Food Defense

- Goal: food defense integration:
  - Board of Health food protection program
  - Supermarket chain operations
  - 2015/16 Grant Support
  - Vulnerability assessments during routine inspections
  - Print food defense toolkits to address findings & provide training
  - Post – toolkit assessments



# Why Grocery Chain Stores?

## More Opportunities!

- Large batches of uniformly mixed food
- Access: buffets, bulk, produce, meat
- Grocers provide the common food supply for almost everyone
  - 54 Large grocery stores, >1,375,000 ft<sup>2</sup> of floor space
- Rapid integration within chains
- Easy to get lost in the shuffle, add products
- Products that reach key demographics
- Pillars of the economy

# 2015/16 Field Assessment Approach

- 12 Large grocery chain stores
- 54 Total stores in jurisdiction
- Integrated with routine inspections
- Unfamiliar inspector enters through public door, check in, with no visible ID
- Did not have to inform police prior to each
- Won't interrupt routine inspection
- Specific ID verification tiers
- More policy-focused, based on FDA FD mitigation strategies database



## Integrated Food Defense Field Assessment Survey

Please fill in the circles completely where applicable. Thank you.

Facility ID: \_\_\_\_\_ Date: \_\_/\_\_/\_\_

### Field Observations

Check-in:		Yes	No
1.	During check-in a staff member asked for my I.D. (If not, skip to question #2)	<input type="radio"/>	<input type="radio"/>
	As part of the check-in process, the facility closely examined my I.D. badge	<input type="radio"/>	<input type="radio"/>
	As part of the check-in process, the facility contacted the CCBH in order to confirm my identity	<input type="radio"/>	<input type="radio"/>
	As part of the initial check-in process, the facility issued a visitor pass to me.	<input type="radio"/>	<input type="radio"/>
2.	After my inspection began, at least one store member asked for my I.D. (If not, skip to question #3)	<input type="radio"/>	<input type="radio"/>
	After my inspection began, at least one store member closely examined my I.D.	<input type="radio"/>	<input type="radio"/>
	After my inspection began, at least one store member contacted the CCBH to confirm my identity.	<input type="radio"/>	<input type="radio"/>
	After my inspection began, the facility issued a visitor pass to me.	<input type="radio"/>	<input type="radio"/>
3.	During my inspection, a manager or designee escorted me.	<input type="radio"/>	<input type="radio"/>
4.	I was escorted approximately _____% of the time.		

5. If I was issued a visitor pass, it was a (circle all that apply):
- I. Sticker Badge
  - II. Badge with pin
  - III. Badge with lanyard
  - IV. Vest



Please complete the following survey to the best of your ability. If a policy is in writing, mark the box on the far right with a "Y" and please show the policy to the Cuyahoga County Board of Health (CCBH) representative. Otherwise, please mark "N" in the box. If you have any questions, please ask your CCBH representative. **Results will be kept anonymous.**

Facility I.D. _____ Date: __/__/__		Always		Sometimes		Never	N/A	Policy In Writing? ( Y or N)
<b>The following policies are in place:</b>								
1	Job applicants must pass a criminal background check	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2	All information provided on employment applications is verified	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3	All references used by an applicant are checked	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4	Frequent job changes are checked with former employers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5	Our employees are trained to ask unknown persons in non-public areas for their I.D.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6	Employees report unknown persons in non-public areas directly to management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7	Employees are trained to report suspicious behavior directly to management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
8	Employees are trained to watch for unusual behavior by co-workers (e.g., staying unusually late after end of shift, asking questions on sensitive subjects, threatening other employees, bringing in outside chemicals)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
9	The facility identifies staff that have unlimited access to all areas of the facility with a visible badge and/or uniform.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10	The facility limits staff access to non-public areas so staff enter only those areas necessary for their job functions and only during appropriate work hours	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
11	The facility collects uniforms, name tags, keys, etc. when a staff member is no longer with the company	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
12	The facility changes IT passwords when those designated staff are	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Please assist the CCBH representative in completing the remainder of the survey (questions 32-36). **Results will be kept anonymous.**

32	The following exterior security measures are in place:	Yes		No	Verified Outside? (Y or N)
	Security personnel	<input type="radio"/>		<input type="radio"/>	
	Monitored video cameras	<input type="radio"/>		<input type="radio"/>	
	Working lighting fixtures at non-public entrance(s)	<input type="radio"/>		<input type="radio"/>	
33	Are any doors propped open?	<input type="radio"/>		<input type="radio"/>	
	If so, how many doors are propped open? _____				
	If propped open, what is holding the door(s) open? _____				
34	Open bay doors are attended by at least 1 employee	<input type="radio"/>		<input type="radio"/>	
35	All non-public exterior doors are self-closing	<input type="radio"/>		<input type="radio"/>	
36	All non-public exterior doors are self-locking	<input type="radio"/>		<input type="radio"/>	

# 2015/16 First Round Surveys

## During Check-in

- Identification requested: 5
- Closely Examined: 2
- Identification verified: 0

## During Inspection

- Identification requested: 5
- Identification closely examined: 3
- Identification verified: 0

→ **One Grocery store requested ID during check-in  
AND during inspection**

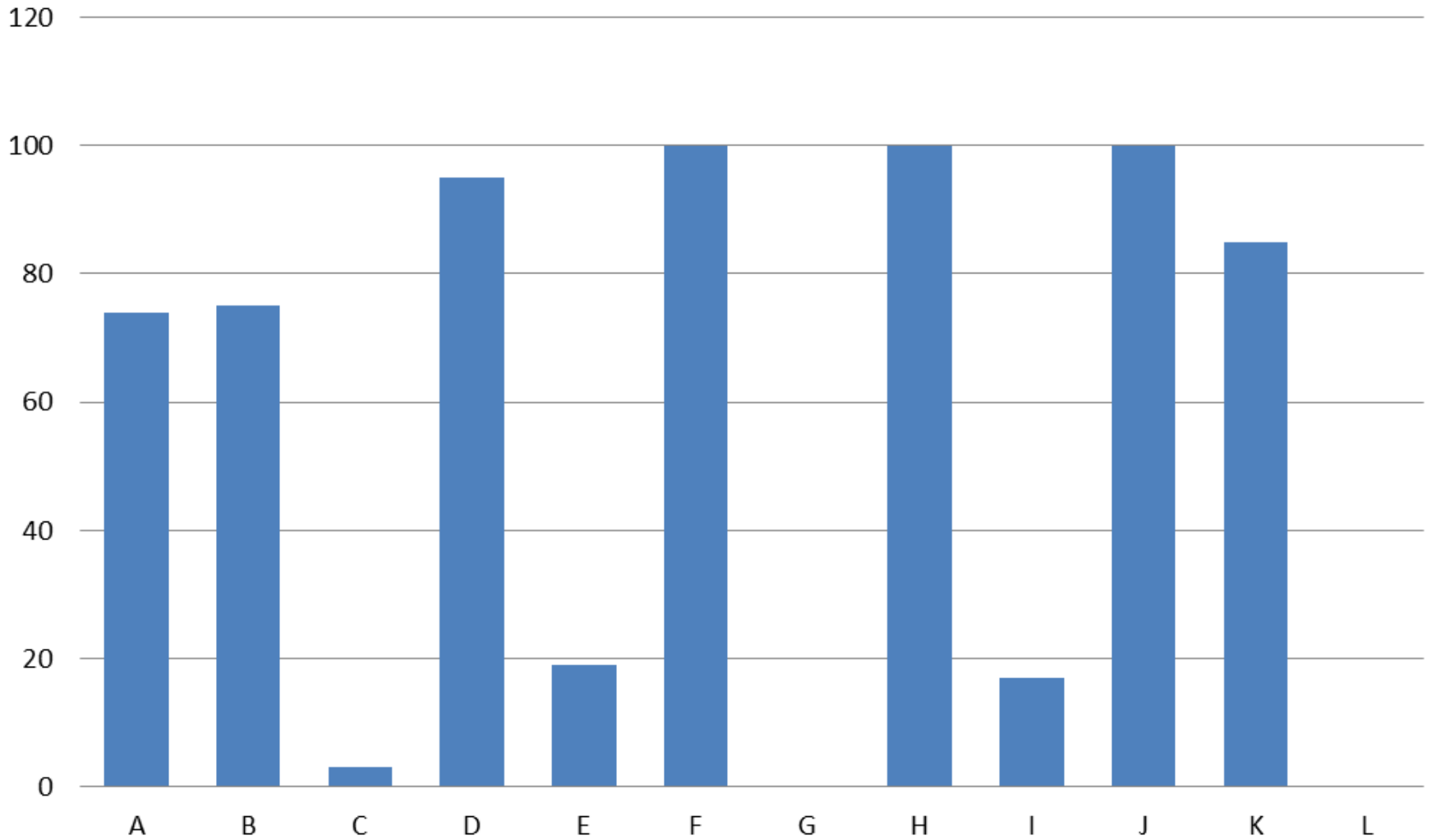


# Preliminary Results

- 42 of 54 facilities escorted inspector
- 28 escorted during 100% of inspection
- 1 door propped open
- **Marked improvements from 2012!**

2015/16

## Average % Time Inspector Escorted



Series1

Grocery Chain Stores

Mean = 56%

# Next Steps

- Print food defense toolkits
- Field interventions with targeted education, food defense toolkits, *prior* to RNC (intervention)
- Post-toolkit integration field surveys
- Comparison of pre/post results

# Intervention (Our Response)

- Occurred between surveys, before RNC
- Forty-five days to complete in 54 stores
- FD toolkit (policies, mitigation strategies, signs) distribution to raise awareness
- Reviewed materials with store manager
- Reinforced policies with employees (targeted education)
- Posted placards with store manager