

Emergency Contacts

Local

Environmental Health Department _____

Public Health Department _____

Police Department _____

Fire Department _____

Water Utility _____

Electricity/Gas Utility _____

State

Food and Consumer Safety _____ 406 444 2837

Federal

US Food and Drug Administration _____ 301 443 1240

US Department of Agriculture _____ 888 674 6854

US Department of Livestock _____ 406 444 5202

Others

This guidance is for operators of licensed retail food establishments and other regulated food service, such as bakeries, bars, bed-and-breakfasts, cafeterias, camps, daycare, group homes, coffee kiosks, commissaries, community events, convenience stores, food banks, fundraisers, grocery stores, hotels/motels, meal delivery, mobile food carts, restaurants, and schools.

Adapted from the FDA "Guidance for Industry, Retail Food Stores and Food Service Establishments: Food Security Preventative Measures Guidance", October 2007, and Ray Pettit Enterprises, Food Security Consulting, Presentation January 2008.

FOOD DEFENSE & EMERGENCY RESPONSE

GUIDELINES FOR

RETAIL ESTABLISHMENTS



MONTANA
Department of Public Health & Human Services

SEPTEMBER 2008

This document is intended to help operators of licensed retail food establishments and other regulated public food service. The suggestions below are actions to prevent intentional contamination of food and respond to an emergency. Not all of these voluntary recommendations may apply because of the diversity of food service. Alternative approaches may be appropriate.

Make a Plan

- ◇ Identify vulnerabilities to your enterprise and evaluate the risk for each. Consider accidents, emergencies such as natural disasters, and deliberate acts of harm. Examples include unexpected recalls, power outages, industrial or transportation accidents, contaminated water supply, vandalism, disgruntled employees, or sabotage from an outsider.
- ◇ Keep the review of vulnerabilities confidential.
- ◇ Develop or update a plan to respond to events, covering identifying, segregating, and securing affected product.
- ◇ Plan for emergency evacuation, including interim security measures.
- ◇ Identify alternative sources for vital elements of operations, such as water supply and storage facilities.
- ◇ Create a contact list of resources for food defense or emergencies, and associates who may be directly impacted. Include 24 hour phone information.
- ◇ Prepare for public communication and media interviews. Clarify customer information goals and effective modes of delivering your message.
- ◇ Respond to threats immediately and appropriately based on the level of severity (complaints, display of anger, hostility or physical harm).
- ◇ Evaluate your security program for effectiveness based on most probable risks, most damaging threats, and past occurrences.

Operations

- ◇ Develop a recall strategy that identifies a responsible person and back-up, customer contact information, health agency contact information, and product disposal protocol.
- ◇ Purchase from vendors that are properly licensed.
- ◇ Inspect all deliveries. Be alert to signs of tampering, such as resealing, disrupted packaging or improper labeling.
- ◇ Do not accept suspect food or unexpected deliveries.
- ◇ Maintain a chain of custody record when applicable.
- ◇ Follow a system for receiving, storing, and handling damaged or returned products.

Employee and Public Management

- ◇ Provide adequate supervision of employees and premises.
- ◇ Screen new employees.
- ◇ Train and update employees on protocols for emergency situations.
- ◇ Restrict access to sensitive materials, areas, and computer systems.
- ◇ Restrict personal items brought in, and provide separated storage.
- ◇ Be aware of an unusual number of employee illnesses or absences, and report to local health authorities.
- ◇ Watch for unusual or suspicious behavior from employees, such as staying late, arriving early, or accessing information not needed for the job.
- ◇ Restrict public access to food processing, storage, and loading areas.
- ◇ Monitor public areas for unusual activity, including self-service areas and chemicals for sale on display.
- ◇ Verify the identity and intentions of unknown visitors.

Physical Security

- ◇ Secure the outside and vulnerable inside areas appropriately. Perform random inspections.
- ◇ Use appropriate and effective deterrents such as fences, locks, passwords, alarms, lighting, video surveillance, and guards.
- ◇ Account for all keys.
- ◇ Change locks, codes, and passwords promptly when an employee leaves and in response to threats.
- ◇ Securely store and limit the amount of toxic chemicals at the facility.
- ◇ Use toxic chemicals according to manufacturer's label (many are not safe to use around food or food equipment). Post MSDS sheets if applicable.
- ◇ Limit access to controls for airflow, water, electricity, and refrigeration.
- ◇ Secure unusual points of entry such as hoses, pipes, or vents.
- ◇ Secure water wells, hydrants, storage and related facilities.
- ◇ Ensure backflow protection to the water system and water trucks.
- ◇ Test water regularly and randomly for contamination, or monitor media alerts of water provider problems.

Computer Systems

- ◇ Track computer transactions.
- ◇ Assess the security, adequacy of virus protection and back-up systems.