

The Global Food  
Defense Institute

Presented by:

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# Unboxing the Intentional Adulteration Rule of FSMA.



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Presentation Topics:



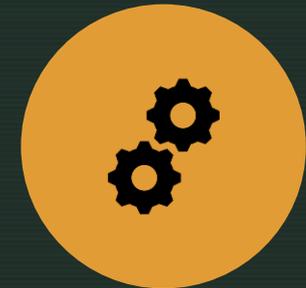
WHAT THE FSMA  
INTENTIONAL ADULTERATION  
RULE REQUIRES



KEY ACTIVITY TYPE AREAS



DEVELOPING REDZONES



CONVERT YOUR  
ASSESSMENT TO YOUR  
FOOD DEFENSE PLAN



## Suspicious Threatening Call

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**This call was received by your receptionist.**

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**What are you going to do?**

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**Who and when do you notify authorities?**

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**What will you tell your customers, employees, etc.**

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**What's in your current food defense plan to deal with this situation?**





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#1

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The Threat of ISIS  
on the Homeland



U.S. EDITION ▾ Tue, Sep 19, 2017

**Newsweek**

U.S. | World | Business | Tech & Science | Culture | Sports | F

**BIRTHRIGHT**  
A WAR STORY

"THIS DOCUMENTARY SHOWS HOW THE U.S. IS  
BECOMING 'THE HANDMAID'S TALE'"

Newsweek

STARTS FRIDAY  
AFI SILVER THEATRE

**WORLD**

## ISIS SUPPORTERS CALL FOR POISONING OF FOOD IN GROCERY STORES ACROSS U.S. AND EUROPE

BY **JACK MOORE** ON 9/7/17 AT 5:12 AM



# November 2017-New York Terrorist



Keys left in ignition and unoccupied at a food plant in New York!

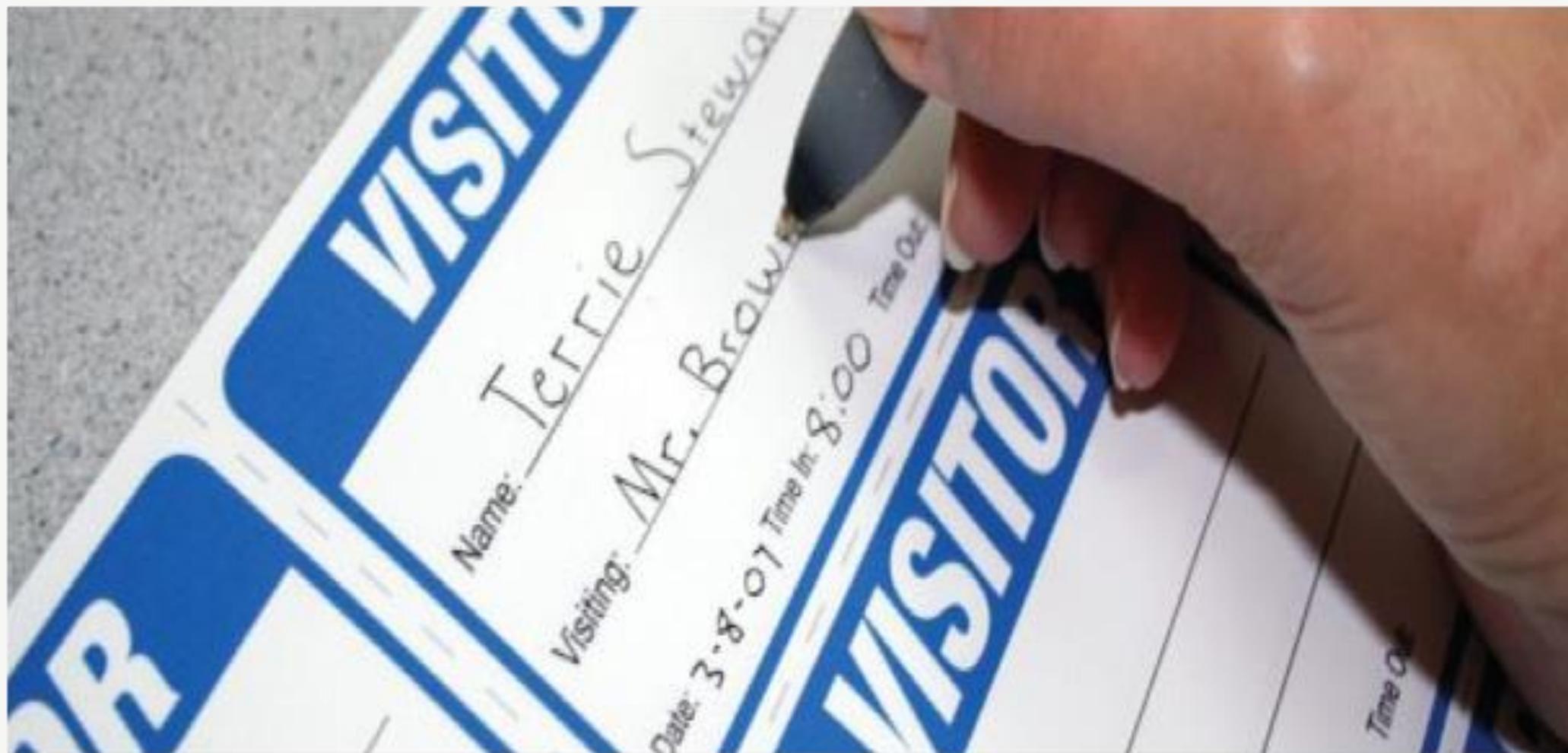
84 Dead in Nice France



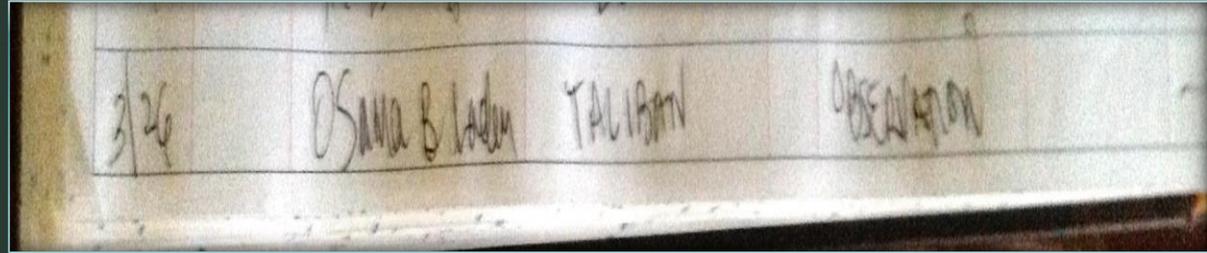
# Weapon of Choice? Vehicles.....



Does your Facility have a Visitor's log?  
What types of ID are required upon entry?



# Look who visited this facility!



- Date: 3/26
- Visitor: Osama Bin Laden
- Company Affiliation: Taliban
- Reason for Visit: Observation/Pre-planning
- Type of Facility: Major Food Processor



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Is identification required to gain entry to the plant?

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If so, who is checking identification?

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Are receptionists properly trained what to look for on ID or do they just visually scan the photo of a presented credential?

How many people here  
are attending this  
awesome conference  
for the first time?  
Please stand up.

Take a close look at  
them. How well do we  
know them?

Ask the person, *“Are  
you really who you  
say you are?”*





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Do you use temporary workers from time to time at your facility?

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What level of access to large batches of products does the temporary workers have?

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What about other types of service workers, are they *really who they say they are*?

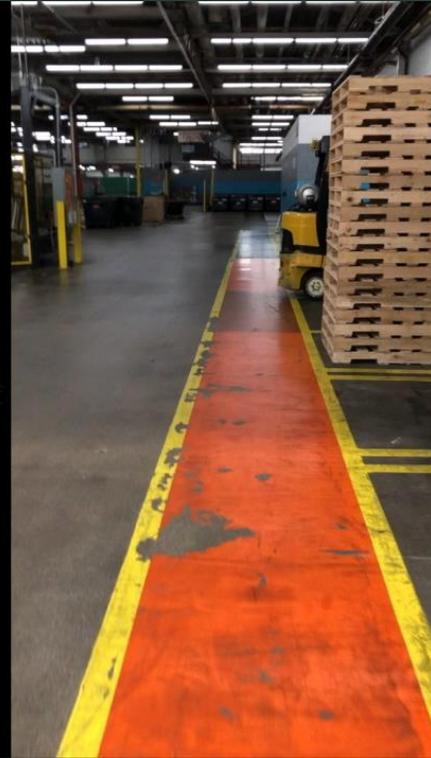
How well do we know  
the contractors and  
temporary persons  
working in our  
facilities?

The Kansas City  
Incident.....



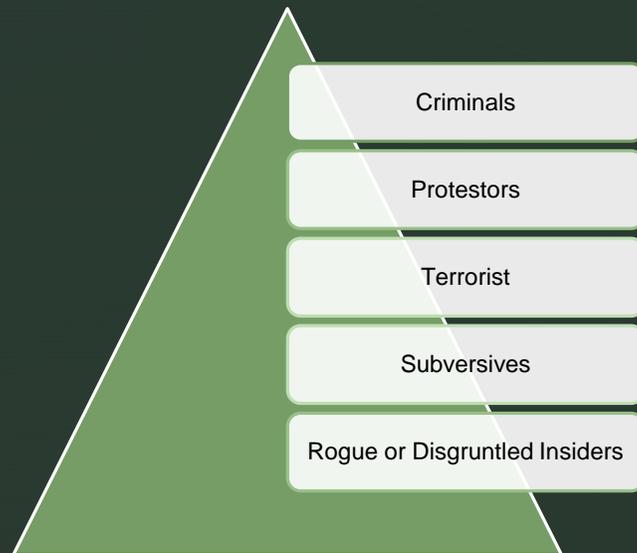
Is your facility a  
hard target or a  
soft target for  
terrorism?

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Step one in Conducting Your  
Food Defense Assessment:

*“Think from the  
perspective of  
the bad-guy”*





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# FSMA Intentional Adulteration Rule What's required?



United States FBI  
External Threats  
“Violent extremists  
and terrorists consider  
America’s agriculture  
and food production  
tempting targets!”



Insider threats/Disgruntled employee, contractor  
or visitor

Food Defense  
focuses on  
protecting the  
food supply from  
intentional  
contamination.



# FDA Focuses on three primary forms of Intentional Adulteration



Acts of Terrorism against the Food and agricultural Supply.



Disgruntled Employees



Economically Motivation Adulteration

# Actionable Process Step



A point, step or procedure in a food process at which food defense measures can be applied and are essential to prevent or eliminate a significant vulnerability or reduce such vulnerability to an acceptable level .



Site Specific



Identified by the vulnerability assessment



Think of HACCP!

# Rule Requirements of Food Facilities



Prepare and implement a written food defense plan



Have conducted a security vulnerability and risk assessment



Provide security awareness training for its employee's



Develop “actionable process steps,” mitigation strategies, procedures for monitoring, corrective actions and verification.

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▼ **Specific Areas to focus on for your assessment -**



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# #1 Key Activity Types (KAT)



With each KAT and while conducting your assessment, consider the following when looking at each area..(Critical)

1. **Accessibility** or ease of access to the areas of each of the activity types;
2. **Vulnerability** of contamination or interference of the process or ingredients of the activity type;
3. **Criticality** of harm to persons, assets or brand if the key activity type is intentionally compromised.

# Bulk Liquid Receiving and Holding



Includes opening the inbound transport vehicle



Opening of venting hatches or other access points



Attaching any pumping equipment or hoses



Unloading of the bulk liquid;



Bulk liquid loading into an outbound conveyance (the outbound movement of liquid product from a facility for further processing or use)



Opening the outbound transport vehicle,



attaching any pumping equipment or hoses, and opening any venting hatches at the facility.

# Liquid Storage and Handling



Storage or holding of liquids (bulk or non-bulk) either in storage tanks or in other tanks at the facility.



This includes bulk or non-bulk liquids in storage silos.



Includes the use of totes or other liquid storage containers where the tamper-evident seals are opened and the container itself is used for storage and where the container is not resealed in a tamper-evident fashion.



Tanks can be used to store liquid ingredients (e.g., fats, oils, vitamin mixes, and sweeteners), hold liquid product for sample testing and other quality control activities, or to store liquid food for other processing purposes;



Handling, metering, surge, or other types of intermediate processing tanks used to control flow rates of liquid ingredients or product through the production system.

# Secondary Ingredient Storage



The process of opening the tamper-evident packaging of a secondary ingredient and moving the ingredient to the production area in advance of being added into the primary product stream;



The process of measuring, weighing, premixing, or otherwise manipulating the ingredient prior to addition to the product stream;



The process of physically adding ingredient directly into the product stream or into surge or meter hoppers to deliver the ingredient into the product stream; or



Rework product, i.e., removing clean, unadulterated food from processing for reasons other than insanitary conditions or that has been successfully reconditioned by reprocessing and that is suitable for use as food.

# Mixing, Blending and Similar Activities



Mixing (i.e., to blend a powder, dough, or liquid ingredient together);



Homogenizing (i.e., to reduce the particle size of an ingredient and disperse it throughout a liquid);



Grinding (i.e., to reduce the particle size of a solid ingredient or mass to a smaller granularity); or



Coating (i.e., to layer a powder or liquid onto the surface of a product, such as a batter, breading, glazing, or flavoring).

# What is a Red/Restricted Zone?



Focused Security Screening and Inspection before being granted entry into key and critical areas of a food plant;



Increased vetting of employees who will be working in the key and critical areas of a plant as identified by the Vulnerability Assessment.



Internal Controls and 100% Auditing of Plant-Issued Credentials;



Risk-Based Food Defense for High Risk Products/Processes as Identified by the Vulnerability Assessment and intelligence.



Increased on-going Security Awareness and Vigilance.



Develop  
**REDZONES** for each  
Key Activity Type

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**Complete  
Your V.A.&  
Food Defense  
Plan at the  
same time!**





***“The Story of the Lil’ old lady  
working in a food plant”***

***(Hint: Front line workers are your  
greatest asset in food defense!)***

## Real Life Experiences: Practical Training Courses

### Development of Your Facility Food Defense and Security Plan

- Assist with providing guidance and instruction to your designated security coordinator, to assist with the creation and implementation of your company security and loss prevention plans and policies
- Review the facility Vulnerability & Threat Assessment and work with the designated facility security representative with the implementation of the recommendations
- Creation of daily Security, Safety and Loss Prevention Audits for the facility.
- Train, provide guidance and assist with the creation of security "SPO's" (Security Performance Objectives) for the facility security officers/team
- Review existing policies and procedures for conducting internal investigations including, but not limited to financial investigations, background checks on personnel and business associates. Make recommendations on what else is essential for a full security program
- Insure that all alarm systems are in working order
- Provide Employee Awareness training to all employees

## Product Tampering Investigations

Our skilled and experienced investigators can assist you with the following:

- Investigate any tampering event or threats to your products, assets and people
- Develop a tampering investigation plan to address and comply with the requirements of FSMA
- Develop, identify and interview potential persons of interest/witnesses
- Properly document the facts and circumstances surrounding the tampering event
- Gather, secure and properly process any and all evidence surrounding the incident protecting and preserving the integrity of the evidence for further processing or presentation to prosecuting agencies.
- Coordinate with authorities, legal representatives and others who are involved with the incident

## Economically Motivation Adulteration:

### Food Fraud Understanding, Training and Assessments

A food ingredient's vulnerability to fraud increases with the complexity of the supply chain. While this is related to the traceability of an ingredient through the supply chain, traceability in the absence of oversight and controls does not preclude the potential for fraud. The vulnerability of the supply chain is related to the degree of "control" that is held by parties with a vested interest in preventing fraud at various points in the supply chain.

## Crisis Management & Incident Response

### Learn How to Handle a Situation When All "Hell" Breaks Loose!!

- Review Crisis Prevention and Response plans to several different types of potential incidents
- Conduct role-play scenarios with Management and Supervisory personnel to insure continuity of understanding of the established company crisis plans
- Review and make recommendations to insure clear and precise communication strategies to use in the event of a crisis

## Workplace Violence Training

- Write and implement a company-wide workplace violence policy that addresses all forms of violence in the workplace
- Insure that management and staff are trained to recognize the early warning signs of workplace violence
- Teach and instruct management and supervisory personnel on the various types of workplace violence and how to deal with them
- Train and education of staff on how to deescalate a brewing workplace situation with the potential for violence
- Assist with the investigation, evaluation and resolution of workplace violence incidents

## REDI-Assessment

### GFDI's "Site-specific" Vulnerability Assessment Tool Used to Create Report

- 170 Questions surrounding the safety and security of your facility
- Color coded report showing your facility vulnerabilities, along with countermeasure and risk mitigation suggestions
- Increase and broaden awareness of management and front line workers, to enable them to better and more quickly identify hazards and other acts of suspicious behavior.
- Establish a baseline by which to enhance and enforce security procedures and protocol at your facility
- Identify events or threats that could potentially pose a threat to the business continuity, brand image, reputation, products and people
- Identification of internal exposures and self-induced threats, which could be potentially hazardous to the operations of the business.
- Enhances the overall culture of security at a facility by allowing employees and management to develop the essential skills and build expertise in the area in which they work that focuses on security events that may affect the operations or personnel of the business.

## REDI-Survive!

### Active Shooter Response & Protection Training for Employees

Some of the areas the training will focus on are:



Ways to "profile" a potential shooter. What are some common characteristics?



Development of an Active Shooter Threat Response Plan



How to recognize the early "warning signs" of an active shooter by simply looking at conditions at your facility



What to do when an Active Shooter is in your facility or vicinity



What to do when Law Enforcement arrives on the scene



Learn ways to "fight-back or take-out" an active shooter when all else fails and evacuation isn't

## REDI-Aware!

### See Something/Say Something Employee Awareness

- Understanding Food Defense and Facility Protection
- Understanding FSMA/FDA
- Your role in Food Defense
- Recognizing Suspicious Persons
- Parking Lot Security/Visitor Facilitation
- Understanding Terrorism and Intentional Tampering at a Food Facility
- Shipping and Receiving Security
- Cargo Security
- Chemical Control/Laboratory Security
- How to handle suspicious packages
- Building Access Policies.
- Preventing Piggybacking/Tailgating. Why this is important?
- Emergency Evacuations
- Active Shooter Protocols: Run, Hide, Fight
- Personal Safety and Protection: Don't be a victim!

## REDI-PCO: Pest Control Operator/Food Safety Auditor

### Vulnerability Assessment Training & Certification

- Understanding and conducting "Mini-Physical Security Assessments" that can aid your clients
- Security Penetration Tests
- Security Countermeasures

## REDI-Highway Watch: Cargo, Highway & Truck Driver Security

### Protecting Your Cargo From Terrorism

- Learn how to secure products that you transport from would be attackers
- Develop ways to stagger your routes to make it difficult for the bad guy to figure out

# Upcoming Food Defense Public Courses

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Food Defense, Crisis Mgt., Intentional Adulteration & Active Shooter Readiness

-Milwaukee, Wisconsin

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April 9<sup>th</sup>-10<sup>th</sup>  
October 1<sup>st</sup>-2<sup>nd</sup>, 2019  
9:00 am - 5:00pm

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Fee: \$1195.00

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[Click here for details/registration](#)

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Food Defense, Crisis Mgt., Intentional Adulteration & Active Shooter Readiness

-New Orleans, La.

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May 13<sup>th</sup>-14<sup>th</sup>, 2019  
9:00 am - 5:00pm

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Fee: \$895.00

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[Click here for details/registration](#)



THANK YOU!

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[www.myfooddefense.com](http://www.myfooddefense.com)



**(202) 368.3007**