

# Food Defense Plans: Perspectives From a 3rd Party Auditor

26 August 2020



## Mission

To positively impact the food supply chain, by

- Promoting food integrity
- Equipping our clients with knowledge
- Supporting the delivery of safe, high-quality food every day



# Meet the Speaker



Earl Arnold  
Global Manager  
Food Defense And FSMA

# Food Defense

- Traditional or Pre-FSMA
  - Site security
  - Sensitive infrastructure
  - Food
  - Workplace issues
- FSMA
  - Wide scale
  - Insider
  - Prevention focused



# Observations: Understanding the Plan

- Corporate/Consultant developed plans
  - Understanding why this is needed/required
  - Not facility specific
    - Example: Bulk Liquid Receiving



# Observations: Inherent Characteristics

- Defined in draft guidance
  - Must happen for the process to work
  - Not easily changed
- Has led to unrealistic assessments of processing steps
  - Employees always in the area
    - Lunch, breaks, weekends
  - Hold over product
    - Decrease start up time



# Observations: Qualified Individuals

- Trained, Educated, Experienced
  - Roles and responsibilities
  - Specific tasks
  - Documented
    - Security contractors
    - Temporary/seasonal employees
    - Promotions/departures





# Observations: Considering Insiders

- Food Safety Professionals
  - Training and education
  - Highest risk is insider
  - Difficult to imagine
    - Lone employee at a processing step
    - Contractor, maintenance, QA functions





# Observations: Pandemics, COVID-19

- Unfortunate event, positive impact
  - Employee access/positive identification
  - Enhanced see something say something
- Visitor/Contractor management
  - Exclusion
  - Monitored/Escorted
  - Re-analyzed

# Observations: Re-analysis

- Changes require a review
  - Regulatory requirements
  - Procedural changes due to pandemic
    - No changes required
    - Reduced vulnerability
  - 3<sup>rd</sup> Party audit requirements
  - Significant changes
  - Positive trend

A blurred background image showing the backs of several people in a crowd, with many of their hands raised in the air, suggesting a Q&A session or a presentation. A large red geometric shape is overlaid on the top left of the image.

Questions  
[earnold@aibinternational.com](mailto:earnold@aibinternational.com)

Presented for Food Safety Consortium on September 3, 2020

