



# Education and Training for Compliance with the FSMA Intentional Adulteration Rule



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# Summary of Requirements of (21 CFR 121.4(b)(2) for Facility Food Defense Team



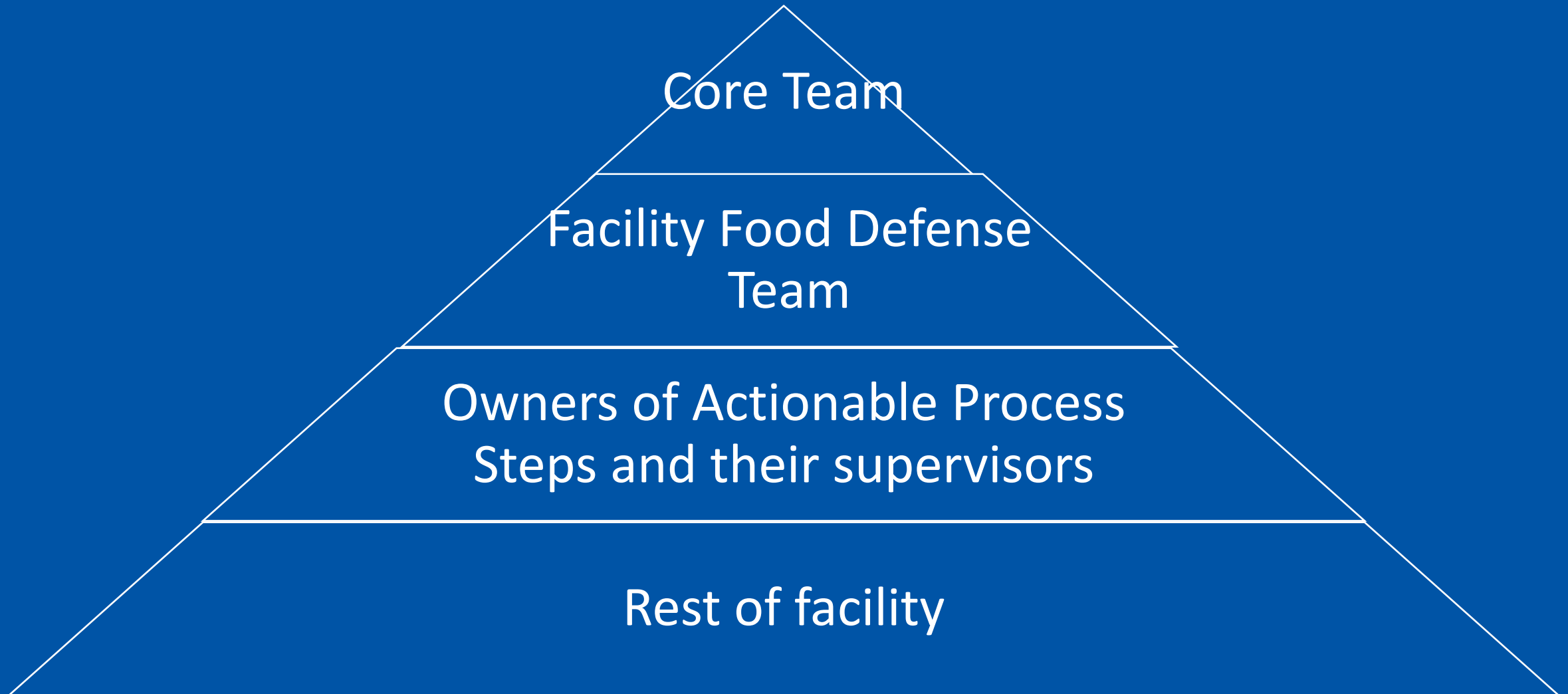
- Must be qualified to:
  - Prepare the Food Defense Plan
  - Conduct a Vulnerability Assessment
  - Identify and explain the Mitigation Strategies
  - Reanalyze the Food Defense Plan
- Qualified =
  - Have the appropriate education, training, or experience (or a combination thereof) necessary to perform the activities
    - Completed training for the specific function at least equivalent to that received under a standardized curriculum recognized as adequate by FDA
    - Qualified through job experience if such experience has provided an individual with knowledge at least equivalent to that provided through a standardized curriculum

# Summary of Requirements of (21 CFR 121.4(b)(2) for Persons assigned to APS + their Supervisors



- Must be qualified to:
  - Work at an Actionable Process Step (including temporary and seasonal)
  - Supervise the work at an Actionable Process Step\*
- Qualified =
  - Have the appropriate education, training, or experience (or a combination thereof) necessary
  - Receive training in Food Defense Awareness
  - \* Supervisors must have a combination of education, training, and experience to supervise the activities

# Intentional Adulteration Structure



# Training



FSPCA Food Defense Awareness  
FSPCA Overview of IA Rule  
FSPCA Conducting Vulnerability Assessments using Key Activity Types  
FSPCA Identification and Explanation of Mitigation Strategies  
FSPCA Conducting Vulnerability Assessments

# Training



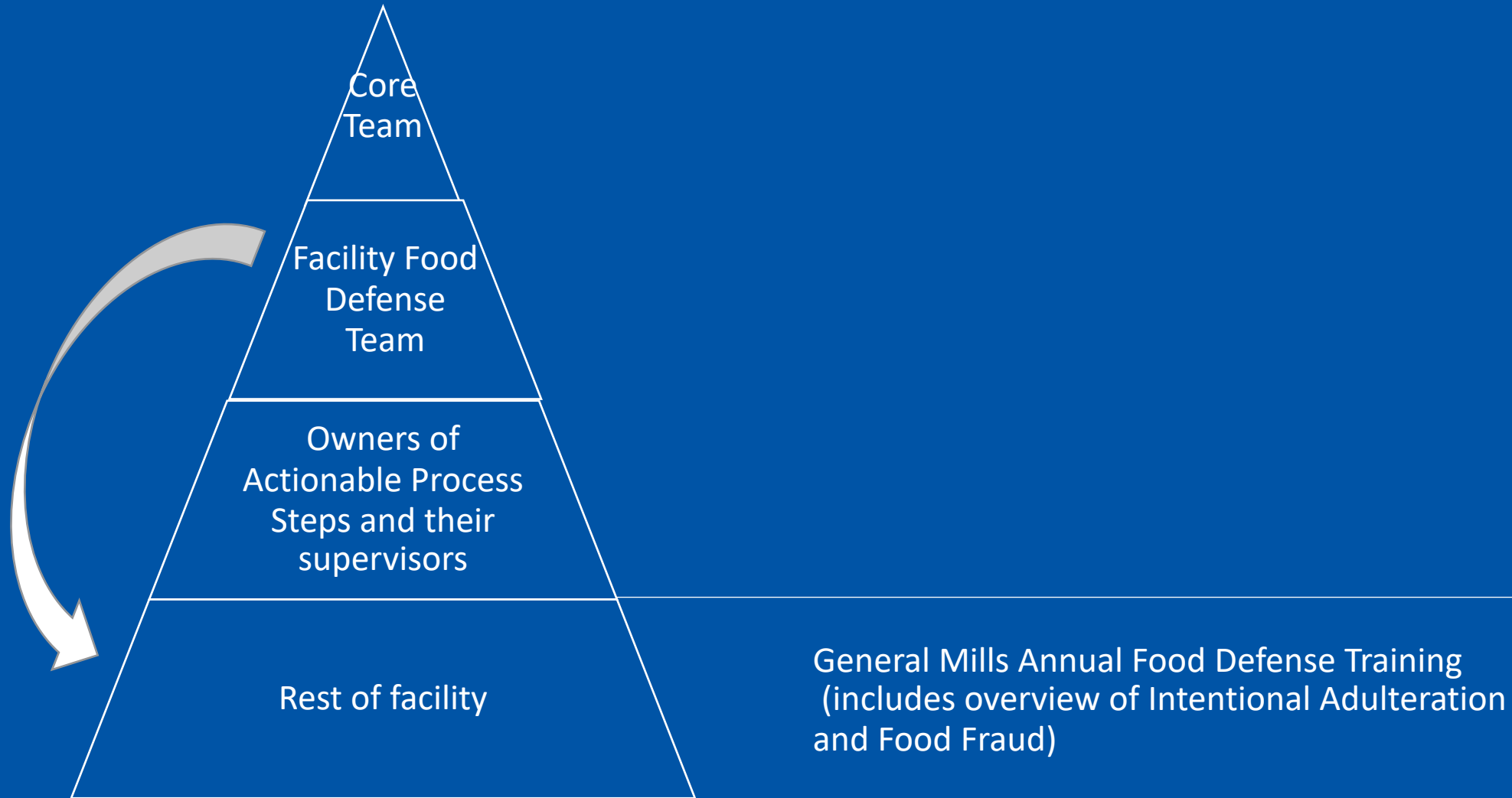
# Training



General Mills Annual Food Defense Training  
General Mills IA Training  
APS specific protocols



# Training







- General Mills training

Training course	Topic	FDA Food Defense Plan Builder Correlation
Annual Food Defense Training	External security focus; Foundational programs	Version 1.0
IA Training	Focused mitigation for internal threats	Version 2.0

- Keys to success:
  - Monthly snippets of IA
  - Individual facility interaction on using FDA Food Defense Plan Builder 2.0 using the facility's Vulnerability Assessments
  - Training is electronically tracked and includes training date, training type, persons trained.



# Questions?



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