



Leverage Safety and Food Safety Cultures for Food Defense

James Nasella September 3rd, 2020

Agenda

Section

Introduction

Background on Culture

Why Culture applies to Food Defense?

Cultural Model Example

Putting it together

Q&A

Introduction



“James R. Nasella is the Global Food Safety and Quality Manager for Tate & Lyle. Since joining Tate & Lyle 2016, James has worked on various projects supporting Quality and Food Safety policies, GFSI standards compliance. Recently James has integral in the development of an Integrated Management System combining the requirements of ISO14001, 45001 and FSSC2200 to simplify QEH&S programs.

Prior to joining Tate & Lyle, James worked for International Flavors and Fragrances (IFF)/Otten's Flavors in Philadelphia. James holds a Master of Science in Food Safety from Michigan State University and Bachelor of Science in Culinary Science from Drexel University.”

Background on Culture

H. W. Heinrich *Industrial Accident Prevention, A Scientific Approach* (1931) Considered the father of Behavioural Based Safety

- Introduced the idea that safety was connected to peoples' behaviours

“Safety Culture” became more widely know from 1986 International Atomic Energy Agency’s (IAEA) first report on Chernobyl nuclear accident.

Frank Yiannas *Food Safety Culture: Creating a Behavior-Based Food Safety Management System* (2008)

- Brought attention to behavioural based systems to the food safety space

A Culture of Food Safety A Position Paper from Global Food Safety Initiative (GSFI) – 4/11/18

- Provided a road map to how GFSI will instruct integration of Food Safety culture into GFSI Standards

Cultural System Differences

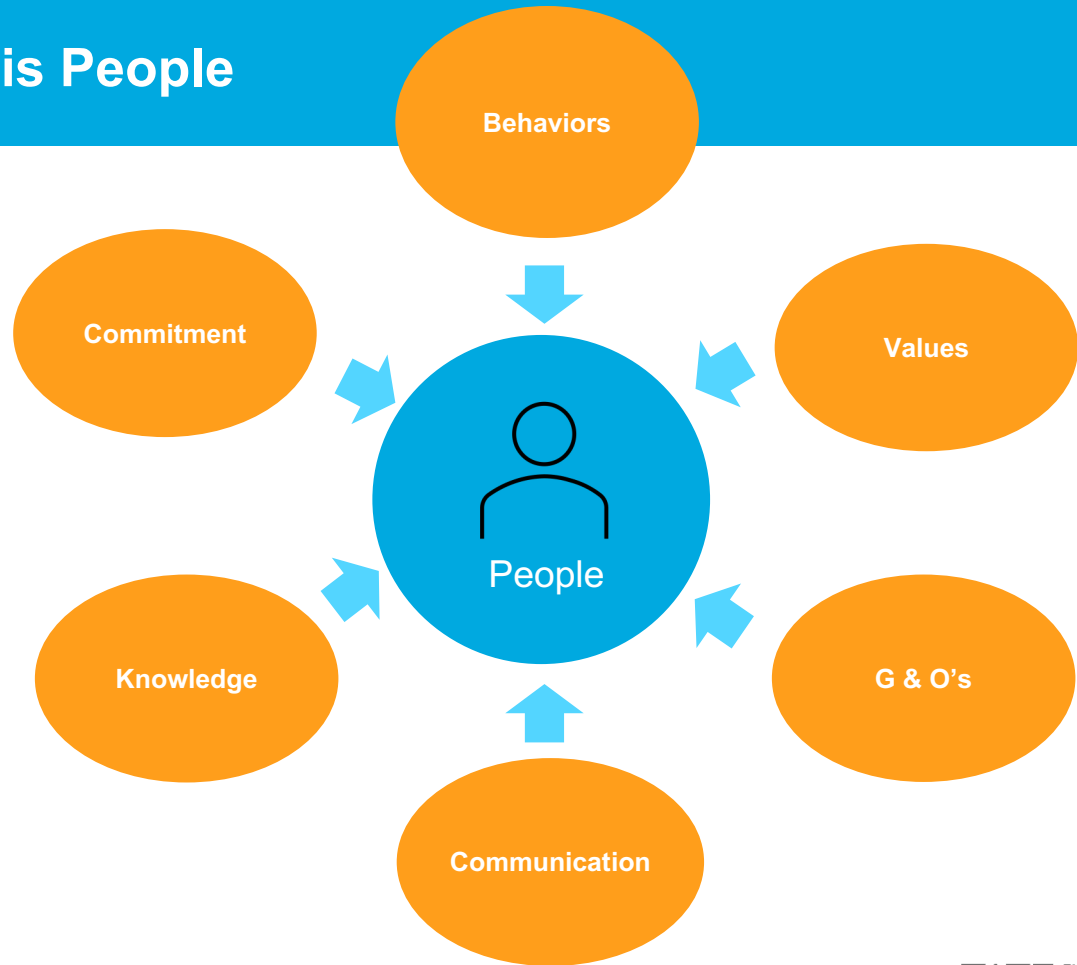
EHS

- Established longer
- More research/references exist

Q/FS

- Rapidly developing
- Large momentum & support

At the Core of Culture is People

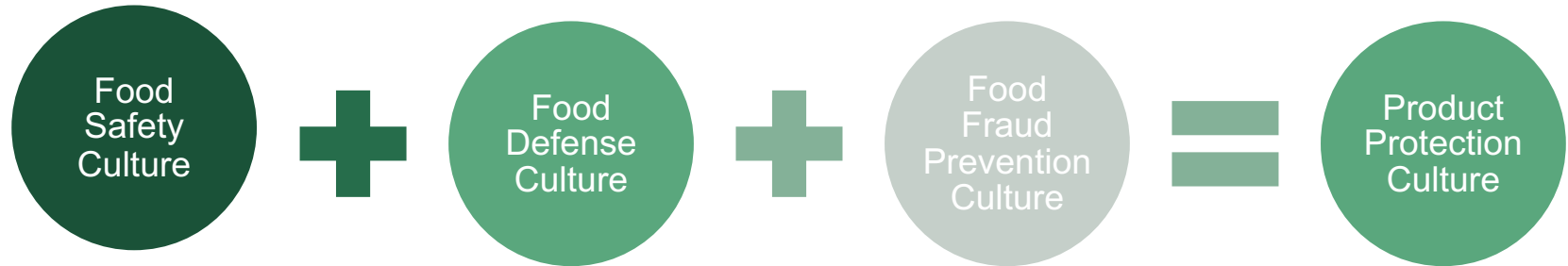


Why Culture applies to Food Defense?

Behavioural based systems are all designed to understand the current status of the culture then work to mature the culture towards the set vision. Thus improving the organization. E.g.:

- Safety Excellence
- World Class Quality/Food Safety

If we connect food defense to cultural models/initiatives this support protection of the product, utilizes existing tools, simplifies the approach.



Cultural Model Example

Model Components:

Cultural Factors/Behaviors

Communication

Training

Metrics/KPIs

Tools/Systems

QEHS Cultural Factors

Commitment

Openness

Positive Feedback

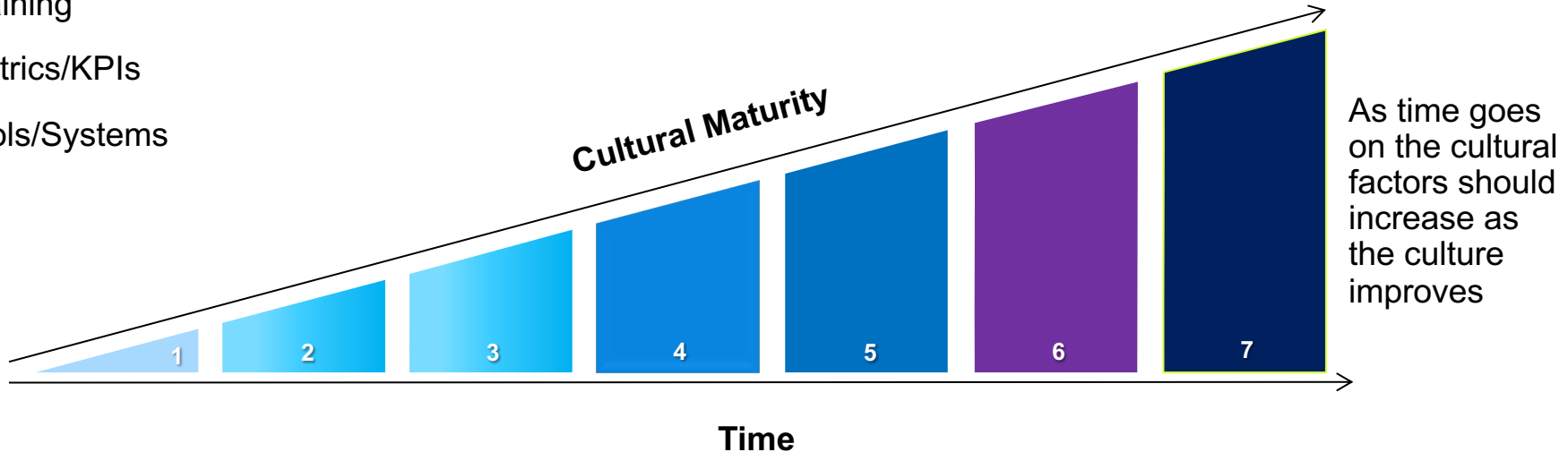
Responsiveness

Risk Awareness

Competency

Involvement

Empowerment



Culture Factor Measurements

Culture can be measured via inputs of those cultural factors/characteristics. This can turn subjective information into objective data



Collect of the data can come via survey/focus groups/employee interviews.

This data can be used to make improvements to the management system/culture supporting the continuous improve philosophy.

Example: Low competency could indicate poor training systems

Connecting the Cultural Factors to Food Defense

Examples:

- Commitment: Leadership's support for Food Defense mitigation strategies
- Openness: Employees willingness to communicate potential threats or concerns
- Responsiveness: How quickly concerns/potential threats are addressed and actioned
- Risk Awareness: Do employees understand the potential food defense threats in their work area?
- Empowerment: Are employees trusted to raise concerns without negative repercussions?



These cultural factors can be change to better reflect your organization's own values & preferred behaviors

Connecting Culture to Mitigation Strategies

Mitigation Strategy Ex:

Restrict access to the production area to authorized personnel with specifically issued identification.

- Employees working at the area are instructed to immediately escort any unauthorized individuals out of the area.
- Notify security personnel or management of the intrusion

Empowerment

Risk Awareness

Responsiveness

Involvement

If your culture promotes trust and supports food defense, wouldn't these two-mitigation strategy responses occur faster and more efficiently?

Communications

Employees will feel connected and engaged if they understand what is happening around them

Examples of Q&EHS Communications and Food Defense possibilities:

- Bulletin boards/posters
 - Food Defense / Insider Attacker awareness posters
- Toolbox talks / Q&EHS Moments
 - Food Defense topics added to rotation
- Feedback/concern reporting
 - Food defense options in electronic system
- Daily/Weekly Operations meetings
 - Mitigation deviation awareness, alerting of visitors/contractors on site

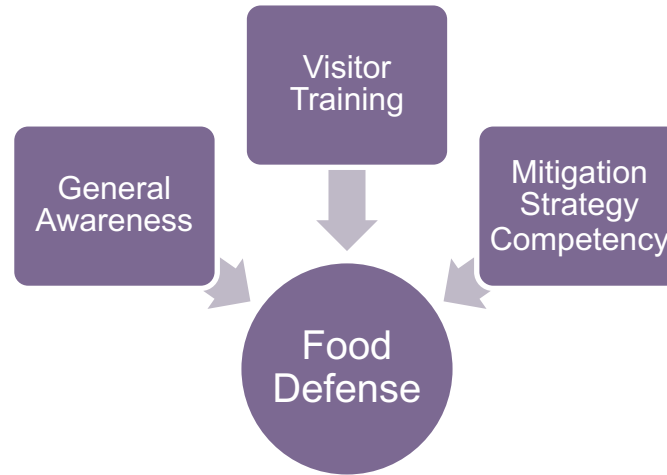


Training

Individuals operating critical safety devices (EHS) and preventive control practices (Q) require training and competency to perform these tasks.

FDA IA Rule and GFSI benchmarks standards required training

If we expand programs and practices for Quality training and competency checks to apply to food defense, we meet both requirements.



Metrics & Key Performance Indicator Examples

EHS	Food Safety	Food Defense
Critical Device Activations	Preventive Control Deviations	Mitigation Strategy Deviation
Near Misses	Concern Reports	Concern Reports
Safety Inspection findings	GMP Inspection Findings	Food Defense inspections*
Stop Work	Out of Spec Product	
Maintenance Service Tickets		

Using the expanded metrics created greater transparency at the facility and may lead to identifying Q&EHS issues before they happens or with root cause analysis

Tools and Systems

Concern Reporting

- Gives employees an option to report suspicious behaviors / deviations

Anonymous reporting systems

- Gives employees an anonymous option to report suspicious behaviors

Maintenance service ticket systems

- Provides evidence if equipment may have been access which could have become contaminated

ERP Systems

- Traceability of products/goods

CCTV Systems



Putting it together

If we:

- Use existing Safety Cultural Tools
- +
- Expand emerging Food Safety Cultural Tools

We can create a more complete culture at our facilities and organizations



A top-down view of three glasses filled with smoothies of different colors (green, purple, and white) on a rustic wooden surface. The glasses are surrounded by fresh fruit, including blueberries, strawberries, and banana slices. The entire image has a purple tint.

Questions?

