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FOOD AND WATER DEFENCE

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NORTH ATLANTIC TREATY ORGANIZATION

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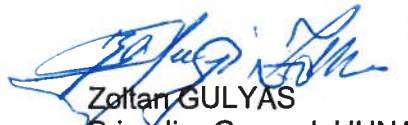
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CHAPTER 1 FOOD DEFENCE POLICY

1.1. INTRODUCTION

1. Food Defence involves the precautions taken to prevent intentional contamination of food/water or the food/water supply by individuals or groups that want to inflict harm to NATO Operations. It differs from general food safety in that food safety relates to the unintentional contamination of food. Although food defence is a separate concept, food defence measures need to be incorporated into the food safety system to ensure prevention measures are in place within food services and food supply operations along the food chain.

2. Intentional contamination of food can have a devastating effect on human resources. It erodes morale and confidence in the food safety system, but also can cause loss of life and/or a reduction in force readiness and mission capability. Effective Theatre food defence measures must be in place to ensure that intentional harm to the food safety system does not occur. From this perspective, all Theatre personnel have a responsibility to do their part in preventing intentional contamination of food by being vigilant and reporting any suspicious activities involving food or water.

3. This chapter introduces food defence policies and measures to prevent the intentional contamination of food and water. In addition, the applicable food defence audits are included in AMedPs 4.5 and 4.7. For the purpose of brevity, within this AMedP food includes water.

1.2.1. RESPONSIBILITIES

1. Overall Food Defence is the responsibility of commanders at all levels and involves NATO elements such as medical, logistics, security, intelligence elements, etc. The kitchen manager is responsible for the overall day to day food defence measures of the feeding facility while food defence audits as part of the overall audit system should be conducted by NATO representatives (who have extensive amount of academic training in food safety and quality management systems and with sufficient experience conducting food safety audits).

1.2.2. TRACEABILITY

Food traceability is required to determine the origins of foods that may have been intentionally contaminated so that they can be removed from the food chain. Upstream and downstream traceability must be ensured when considering food defence measures. Upstream traceability focuses on where food initially comes from, such as food manufacturers, suppliers, distributors and raw material producers (farm, fisheries, etc.). In this case, ingredients/foods that are stored or are used in food services operations must have documentation of their origins readily available. This will save time for NATO operations by helping identify and/or eliminate incidents in which foods are suspected of being contaminated. With respect to downstream traceability, food that is leaving NATO food supply installations and food services locations must have documentation stating where the food is going and which unit will receive the food. Therefore, if a recall occurs the suspected food can be taken out of the food chain as soon as possible.

1.2.3. FOOD RECALL

A food recall system must be an integral component of food supply and food services operations. When a food recall situation occurs as a result of a suspected intentional contamination, the food in question should be quarantined immediately and responsible police/security elements must be contacted as soon as possible.

1.2.4. TAMPERING INVESTIGATIONS

If tampering of food is suspected, suspect food must be quarantined immediately. Theatre security and medical force protection elements must be contacted as soon as possible to investigate the suspected incident. All suspected food must be removed from the food chain including food being stored, staged, transported, processed (production) and being served. Veterinary, Medical and Preventive Medicine personnel may be involved in laboratory testing and epidemiological investigations if required.

1.2.5. INSPECTIONS AND AUDITS

Food Defence Audits shall be incorporated into the normal food safety inspection/audit process and held at the same frequency. These food defence audits may be adjusted based on Theatre threat assessment. Security elements should be consulted regarding the frequency of food defence audits. Additional food defence audits could be completed to monitor identified specific vulnerabilities.

1.2.6. CRISIS MANAGEMENT AND CONTINGENCY PLAN

If a food services facility is closed or partially closed due to a food defence incident, this operation must have a contingency plan in place to ensure food services operations continue.

1.2.7. FOOD DEFENCE RISK ASSESSMENT AND FOOD DEFENCE PLAN

1. Food Defence Risk Assessment. For NATO food service operations, a Food Defence Risk Assessment must be completed prior to commencing operations using the questionnaire found at Annex A for their feeding operation. If food services operations are contracted out, the contractor must conduct the same Food Defence Risk Assessment. This assessment will help determine the Food Defence Plan that must be put in place. The Food Defence Risk Assessment should be completed in consultation with security elements and should be reevaluated at least once per year (or more frequently when required).
2. Food Defence Plan. Each NATO food supply and food service operation must have a written Food Defence Plan based on the Food Defence Risk Assessment. Similarly, contracted food processors, food suppliers and food services operations that supply/provide for/to NATO Operations must have a written Food Defence Plan.¹

¹ An example of a Food Defence Plan Builder can be found at the follow link:

<http://www.accessdata.fda.gov/scripts/fdplanbuilder/download.cfm>

Before downloading the Builder, ensure your Information Technology/Information Systems representative approves the downloading the program on you work computer system. The Food Defence Plan must be completed in consultation with security elements. Security elements must designate the plan with the appropriate security designation.

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CHAPTER 2 FOOD DEFENCE CONSIDERATIONS/MEASURES

2.1. INTRODUCTION

There are four main areas that need to be evaluated when implementing, monitoring and verifying food services operations. These are: food and water supply, food transportation, physical security of food supply and food services facilities, and employees and visitors. Food defence measures within these areas must be completed with audits as prescribed in section 1.2.5. of this AMedP.

2.2. FOOD AND WATER SUPPLY

The use of approved sources with food defence measures is required to assist in preventing intentional contamination of the food supply.

2.2.1. APPROVED SOURCES

All food ingredients (including water) whether raw, frozen, dry, prepared, canned or pre-cooked used in NATO supply depots, retail shops, food services facilities, restaurants, and coffee shops are required to come from an approved source with proper documentation. "Source" is defined as the location in which the food or water is produced and not the distributor, or distributor's facility. An approved source is defined as food coming from a location that has been audited in accordance with AMedP 4.5., STANAG 2556 or a food product listed or exempted in the US Army Worldwide Directory of Sanitarily Approved Food Establishments for Armed Forces Procurement. The veterinary/preventive medicine authority can authorize a food supplier that has not been audited IAW AMedP 4.5., STANAG 2556, but is produced in the European Economic Area (EEA) in compliance with European Union (EU) legislation, or delivered by an EU/EEA approved exporter. Unapproved sources should be rejected at delivery and not allowed into the facility.

2.2.2. LOCAL FOOD SOURCES

The use of locally procured (in Theatre) food sources is discouraged. If a food establishment considers using a local source(s) that is not already listed in the section 2.2.1., this/these local source(s) of food may only be approved after a qualified auditor conducts an audit in accordance with AMedP-4.5, Audit Principles, STANAG 2556.

2.2.3. FOOD SUPPLY RECORDS

Managers must keep records of the sources of all food served in the facility for a minimum of six months to allow Preventive Medicine/ Veterinary personnel to verify that the food is being obtained from approved sources. Managers will provide a copy of invoices for the last six months to the Preventive Medicine / Veterinary inspector at each inspection if requested. If at any time the source (not the distributor) cannot be identified, the product was not transported as per 2.3 below, or there is no approved sources documentation as in paragraph 2.2.1, then the product is considered unapproved and must be disposed of or quarantined.

2.2.4. FOOD PREPARED OFF-SITE/OFF-SITE WAREHOUSING

No food can be stored and/or prepared offsite and brought into the facility unless it is from an approved source. Offsite preparation of food should be strongly discouraged as it increases the risk of food defence issues.

2.3. FOOD TRANSPORTATION

All food must be transported by authorized means, with documented food handling controls in place at all times.

2.3.1. ALLIED FORCES FOOD TRANSPORTATION

During transportation operations, food needs to be secured (locked and sealed) at all times. Each delivery of food should be inspected by competent and trained receiving personnel from the food establishment that is receiving the shipment. Receiving inspectors should also inspect each delivery for tampering, physical damage and contamination.

2.3.2. CONTRACTED FOOD TRANSPORTATION

When using contracted transportation, the above measures stated in 2.3.1 still apply. In addition, NATO Theatre security elements need to be consulted to ensure that all food defence measures are in place when a contractor transports food. Examples of these measures could include seal tags, photography of driver, etc.

2.4. PHYSICAL SECURITY OF FOOD SERVICES FACILITIES

There must be adequate physical security within and outside Food Services buildings and Food Services areas so that unauthorized individual(s) are not able to gain access. Areas that are not constantly observed must be secured.

2.4.1. OUTSIDE GROUNDS AND ROOF AREAS

A system must be implemented to adequately reduce food defence vulnerabilities from outside grounds and roof areas. Food Services facilities must consider the following:

- a. Perimeters secured to restrict access to establishment and related outbuildings as required. Proper signs should be posted as necessary;
- b. Security cameras utilized at key locations around facilities and outbuildings when required;
- c. Regular documented patrols conducted of outside grounds and roof area;
- d. Access restricted and locked to roof, silos, outbuildings with food safety-sensitive materials, bulk storage tanks, bulk receiving stations, etc;
- e. Potential hiding places for persons or intentional contaminants minimized;
- f. Adequate exterior lighting provided around grounds to include parking lots, doorways, loading docks, bulk storage areas, silos, etc;
- g. Documented system in place to control and identify people, vehicles and drivers of vehicles that authorized to enter and/or park on premises (see section 2.5. Employees And Visitors for more details);
- h. Program in place to address any unusual security issues noted on outside grounds;
- i. Entrances to establishment are minimized and monitored; and
- j. Secured metal or metal-clad doors utilized on entrances to establishment.

2.4.2. RECEIVING

1. A system must be in place and implemented to adequately reduce food defence vulnerabilities in the receiving area(s). Food Services facilities must consider the following:

- a. Suppliers provide documented evidence with assured food traceability of their food defence programs;
- b. Procedures are in place to cover receipt of all materials:
 - (1) Arrival of truck at establishment verified and driver identification verified;
 - (2) Bill of lading, receiving documents, amount of seals, and seal numbers verified;
 - (3) Truck and trailer inspection conducted by trained establishment personnel before and after unloading;
 - (4) Product(s), amounts, labels, lot numbers, etc., verified at time of receipt;
 - (5) Procedures in place for handling damaged or rejected materials;
 - (6) Less-than-load/partial load shipments have a food security system in place;
 - (7) Procedures in place to address quarantine and release, irregularities in amounts outside a predetermined range, evidence of tampering, or counterfeiting of goods received; and
 - (8) Documented requirement for tamper-resistant/evident packaging for received materials, when feasible.
- c. Additional procedures are in place to cover receipt of all bulk materials:
 - (1) Arrival of truck at establishment verified and driver identification verified, for bulk materials;
 - (2) Bill of lading, receiving document, the actual amount of bulk product/materials received is verified (weights, meters, etc.) against the receiving document, truck seals and seal numbers verified for bulk materials;
 - (3) Unloading equipment for bulk materials (hoses, pipes, caps, augers, etc.) secured and inspected prior to use;

- (4) Unloading process for bulk materials conducted in a secured area and monitored during entire process; and
- (5) Trailer for bulk materials is inspected after unloading and all unloading equipment re-secured.

2.4.3. PROCESSING AREA

All employees working in processing area must ensure that food supplies are observed at all times (eyes on). If food supply cannot be observed by Food Services staff, it must be secured in locked areas or applicable restricted areas. Any unusual/suspicious activities must be reported to the chain of command immediately.

2.4.4. WITHIN FACILITIES

1. Processes within facilities must adequately reduce food defence vulnerabilities. Food Services facilities must consider the following:

- a. Documented assessment conducted to indicate sensitive areas; access restricted to authorized individuals in identified sensitive areas;
- b. Water supply and related critical components are secured. Plans in place to address and react to possible water defence issue;
- c. Appropriate access control, (e.g. CCTV monitoring, and/or supervision) present at key manufacturing and storage locations. Access to areas where food is handled, stored or processed should always be restricted to the necessary minimum;
- d. Access to bulk ingredients, gas, or chemical storage vessels are controlled to limit unauthorized access to hatches, filters, vents, etc;
- e. Physical barriers in place and/or access restricted to hazardous compounds;
- d. Program to identify any sample or opened ingredient containers; employees aware of program and understand procedures;
- e. Food defence detection devices monitored and inspected on a regular basis as appropriate to ensure proper function;
- f. Tamper-resistant/evident packaging and/or seals provided for finished goods as applicable;

- g. Labels held in a secure area; program exists to destroy all obsolete or defective labels;
- f. Equipment design evaluated to minimize possible product tampering; and
- p. If present/ available, in-house laboratories secured and access restricted to authorized personnel and positive control cultures of pathogens kept secure.

2.4.5. FOOD STORAGE

All storage areas should be under constant observation. When constant observation is not obtainable, storage areas must be locked.

2.4.6. FINISHED GOODS STORAGE

1. A system must be in place and implemented to adequately reduce food defence vulnerabilities from the finished goods storage/shipping area(s). Food Services facilities must consider the following:

- a. Quantities of finished goods are tracked and programme in place to investigate missing or extra stock;
- b. Public storage warehousing and shipping companies utilized by the establishment practice food defence;
- c. Procedures exist for inspection of all vehicles prior to loading. Inspections conducted of all outbound vehicles prior to loading;
- d. Wash certificates and/or seals verified with trailers;
- e. Trailer sweepings or other removed materials handled appropriately;
- f. Amounts and lot numbers of materials verified during loading;
- g. Outbound driver identification verified; and
- h. Security of trucks and trailers maintained during transport to include multiple stops or deliveries. Drivers must be made aware of requirement to secure trucks and trailers.

2.4.7 CHEMICAL AND NON-FOOD STORAGE

Chemicals and non-food items must be secured in an area separate from food handling and food storage areas. Food Services operations should limit chemicals in the establishment to those that are required for the operation and

maintenance. Chemicals must be properly labelled. Missing chemical stock or other irregularities must be investigated. Data-sheets describing the hazards and properties of the chemicals, etc., should be available.

2.4.8. FOOD DISTRIBUTION

1. Food Distribution. The objective in the food distribution area is to minimize the opportunity for the intentional contamination of products during the loading process. Some measures to take are the following:

- a. Do not accept unscheduled deliveries; investigate any delivery delays;
- b. Limit loading area to authorized personnel;
- c. Identify securable unloading zone with signage;
- d. Ensure adequate lighting;
- e. Verify shipping documents are correct;
- f. Verify packaging integrity;
- g. Establish a driver identification policy. Pre-identify drivers;
- h. Verify driver ID upon arrival;
- i. Restrict driver location upon arrival to unloading dock, or non-sensitive rest areas;
- j. Ensure that trucks/trailers remain locked until unloading;
- k. Initiate random security checks of area/operations by supervisors;
- l. Ensure dock area are locked and require landing gear locks for tractor-less trailers parked at dock door;
- m. Develop and use a system to track inventory throughout operations
- n. Use peer employee monitoring for unloading functions at vulnerable locations; and
- o. Monitor area with surveillance cameras when required.

2. Water Distribution at Food Establishments. The following must be adhered to in relation to water distribution:

- a. Restrict access to and lock storage tanks for potable water and to water reuse systems;

- b. Ensure access to lines that transfer water or ingredients are examined and restricted;
- c. Ensure access to plant ice-making equipment is controlled;
- d. Ensure restricted ingredients are controlled;
- e. Ensure supplier has a viable food defence plan; and
- f. Restrict outdoor access to water wells/sources.

2.4.9 ACCESS TO COMPUTER SYSTEMS

1. Restricted access to computer process control systems and critical data systems must be enforced at all times; only those personnel with appropriate clearances will be permitted to access these systems. Ensure that computer access is removed when a staff member is no longer associated with the establishment.
2. Establishments must have a traceability system of computer transactions. Computer systems must also have adequate virus protection and procedures for backing up critical computer based data systems.

2.5. EMPLOYEES AND VISITORS

An Employee and Visitor Food Defence programs must be implemented to adequately reduce food defence vulnerabilities.

2.5.1. EMPLOYEES

1. All personnel working in Food Services operations must have at minimum a security check performed to have the necessary security clearance to work in food services areas. The level of security clearance is determined by the Theatre security element. Food Services facilities must ensure the following for employees working in food services areas:
 - a. A formal pre-hiring screening program in place for all employees and contracted personnel; no employees or contracted personnel are working without pre-hiring screening being completed and approved;
 - b. Positive identification and recognition system in place for all personnel entering the establishment;
 - c. System in place to restrict employee access inside and outside of the establishment to authorized areas only;

- d. Documented employee training program in place to cover food defence, including identification of potential signs and evidence of tampering;
- e. Traffic patterns are restricted to employee changing room areas for arriving employees;
- f. Restricted employee areas provided for personal belongings. There should be no evidence of personal belongings outside designated areas;
- h. Formal uniform or outer garment program in place;
- i. Employees not allowed outside of establishment or designated outside break areas during work hours; and
- j. Security element must be consulted with respect to employee lockers in locker rooms and other personal storage areas must be inspected on a regular basis.

2.5.2. EMPLOYEE TRAINING

The level and composition of Food Defence training for employees should be determined using Annex A - Food Defence Risk Assessment Questionnaire and the Food Defence Plan. Food Defence training should be given to only those employees on a need to know basis, keeping in mind employee security clearance levels. A Food Defence Training Plan must be created and reviewed by security elements prior to being implemented. The Food Defence Training Plan must describe who needs to be trained to what level while keeping in mind employee security clearance levels.

2.5.3. VISITORS

1. All visitors must have an adequate security clearance to travel into or work within the Food Services operational areas or must be escorted and observed by Food Services staff for the duration of their visit. The level of security clearance for visitors is determined by Theatre security elements. Food Services facilities must ensure the following for visitors coming to food services/supply areas:

- a. Visitors, including contractors, maintenance, etc., must first report to designated entrance/sign in areas;
- b. Established policies are provided to visitors, contractors, guests, etc., and food services facilities identification provided with the date of issue and expiration;

- c. Visitors, contractors, guests, etc., must comply with the company dress policy and should be visible and easily recognized during their visit; and
- e. Visitors, with the proper security classification, must be accompanied in food-sensitive areas.

ANNEX A - FOOD DEFENCE RISK ASSESSMENT

The below Food Defence Risk Assessment should be completed before commencing food services operations and a minimum once/year (unless otherwise required) in conjunction with on the ground NATO security elements. The following questions must be answered by NATO food supply depot or food services managers. Note: adopted and adapted from the FDA site (<http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/FoodDefence/ucm083075.htm#appendix>)

Form Instructions:

Step 1 - Answer the following questions in relation to Food Defence with your facility. Answer Yes, No, Non-Applicable (NA) or Do Not Know.

Step 2 – For each No or Don't Know answer, explain your action to mitigate this specific point (Actions to rectify non-Compliance)

Step 3 – If you cannot rectify this issue, explain why.

Step 4 - Once Step 3 is complete, sign and date the document at end of the assessment.

(NA – Non-Applicable)

1. Food Establishment Operations – Management						
Question #	Question	Yes	No	NA	Do Not Know	Actions to rectify non-Compliance
1.	Are you prepared for the possibility of tampering or other malicious, criminal, or terrorist actions					
2.	Have you assigned responsibility for security to knowledgeable individual(s)					
3.	Have you conducted an initial assessment of food security procedures and operations					
4.	Do you have a security management strategy to prepare for and respond to tampering and other malicious, criminal, or terrorist actions, both threats and actual events, including identifying, segregating and securing affected product					
5.	Do you have a plan for emergency evacuation, including preventing security breaches during evacuation					
6.	Do you maintain any floor or flow plan in a secure, off-site location					
7.	Are you familiar with the emergency response system with your NATO Operation					
8.	Is management aware of 24-hour contact information for security elements					
9.	Have you made staff aware of who in management they should alert about potential security problems (24-hour contacts)					
10.	Do you promote food security awareness to encourage all staff to be alert to any signs of tampering or other malicious, criminal, or terrorist actions or areas that may be vulnerable to such actions, and reporting any findings to identified management					
11.	Do you have an internal communication system to inform and update staff about relevant security issues					
12.	Do you have a strategy for communicating with your diners					

2. Food Establishment Operations – Supervision

Question #	Question	Yes	No	NA	Do Not Know	
1.	Do you provide an appropriate level of supervision to all staff, including cleaning and maintenance staff, contract workers, data entry and computer support staff, and especially new staff?					
2.	Does your staff conduct routine security checks of the premises, including automated manufacturing lines, utilities and critical computer data systems (at a frequency appropriate to the operation) for signs of tampering or malicious, criminal, or terrorist actions or areas that may be vulnerable to such actions.					

3. Evaluation

Question #	Question	Yes	No	NA	Do Not Know	Actions to rectify non-Compliance
1.	Do you evaluate the lessons learned from past tampering or other malicious, criminal, or terrorist actions and threats					
2.	Do you perform random food security inspections of all appropriate areas of the facility (including receiving and warehousing, where applicable) using knowledgeable in-house or third party staff					
3.	Do you verify that security contractors are doing an appropriate job, when applicable					

4. Recall Strategy

Question #	Question	Yes	No	NA	Do Not Know	Actions to rectify non-Compliance
1.	Have you identified the person responsible for recall, and a backup person					
2.	Have you provided for proper handling & disposition of product					
3.	Have you identified applicable contacts, addresses and phone numbers such as theatre units, security elements, emergencies response unit, etc.					

5. Investigation of Suspicious Activity						
Question #	Question	Yes	No	NA	Do Not Know	Actions to rectify non-Compliance
1.	Do you investigate threats or information about signs of tampering or other malicious, criminal, or terrorist actions					
2.	Do you alert appropriate law enforcement and public health authorities about any threats of or suspected tampering or other malicious, criminal, or terrorist actions					

6. Human Element – Staff						
Question #	Question	Yes	No	NA	Do not Know	Actions to rectify non-Compliance
1.	Do you examine the background of all staff as appropriate to their position, considering employees' access to sensitive areas of the facility and the degree to which they will be supervised					
2.	Do you know who is working, who should be on premises, and where they should be located, for each shift					
3.	Do you keep daily work information updated					
4.	Have you establish a system of positive identification and recognition that is appropriate to the nature of the workforce, when appropriate					
5.	Do you collect the uniforms, name tag, or identification badge when a staff member is no longer associated with the establishment					
6.	Have you identified staff that require unlimited access to all areas of the facility					
7.	Do you reassess levels of access for all staff periodically					
8.	Do you limit access so staff enter only those areas necessary for their job functions and only during appropriate work hours					
9.	Do you change combinations, rekey locks and/or collect the retired key card when a staff member who is in possession of these is no longer associated with the establishment, and additionally as needed to maintain security					
10.	Do you restrict the type of personal items allowed in establishment					
12.	Do you allow in the establishment only those personal use medicines that are necessary for the health of staff and ensure that these personal use medicines are properly labeled and stored away from food handling or storage areas					

13.	Do you prevent staff from bringing personal items into food handling or storage areas					
14.	Do conduct regular inspection of contents of staff lockers, bags, packages, and vehicles when on company property					
15.	Do you incorporate food security awareness, including information on how to prevent, detect, and respond to tampering or other malicious, criminal, or terrorist actions or threats, into training programs for staff, including seasonal, temporary, contract, and volunteer staff					
16.	Do you provide periodic reminders of the importance of security procedures					
17.	Do you encourage staff participation in security procedures					
18.	Do you watch for unusual or suspicious behavior by staff					
19.	Are you alert for atypical staff health conditions that staff may not voluntarily report and absences that could be an early indicator of tampering or other malicious, criminal, or terrorist actions, and reporting such conditions to local health authorities					

7. Human Element – Public

Question #	Question	Yes	No	NA	Do Not Know	Actions to rectify non-Compliance
1.	Do you inspect incoming and outgoing vehicles, packages and briefcases for suspicious, inappropriate or unusual items or activity, to the extent practical					
2.	Do you restrict entry to the establishment					
3.	Do you ensure that there is a valid reason for the visit before providing access to the facility - beware of unsolicited visitors					
4.	Do you verify the identity of unknown visitors					
5.	Do you restrict access to food handling and storage areas					
6.	Do you restrict access to locker room					

8. Facility						
Question #	Question	Yes	No	NA	Do Not Know	Actions to rectify non-Compliance
1.	Do you protect perimeter access with fencing or other deterrent, when appropriate					
2.	Do you secure all doors, windows, roof openings/hatches, vent openings, ventilation systems, utility rooms, ice manufacturing and storage rooms, loft areas, trailer bodies, tanker trucks, railcars, and bulk storage tanks for liquids, solids, and compressed gases					
3.	Do you use metal or metal-clad and locked exterior doors to the extent possible when the facility is not in operation, except where visibility from public thoroughfares is an intended deterrent					
4.	Do you minimize the number of entrances to restricted areas					
5.	Do you secure bulk unloading equipment when not in use and inspect the equipment before use					
6.	Do you account for all keys to establishment					
7.	Do you monitor the security of the premises using appropriate methods					
8.	Do you minimize, to the extent practical, places that can be used to temporarily hide intentional contaminants					
9.	Do you provide adequate interior and exterior lighting, include emergency lighting, where appropriate, to facilitate detection of suspicious or unusual activities					
10.	Have you implemented a system of control for vehicles authorized to park on the premises					
11.	Do you keep parking areas separated from entrances to food storage and process areas and utilities, where practical					

9. Storage and Use of Poisonous and Toxic Chemicals (for example, cleaning and sanitizing agents, pesticides)						
Question #	Question	Yes	No	NA	Do not Know	Actions to rectify non-Compliance
1.	Do you limit poisonous and toxic chemicals in the establishment to those that are required for the operation and maintenance of the facility and those that are being held for sale					
2.	Do you store poisonous and toxic chemicals as far away from food handling and storage areas as practical					
3.	Do you limit access to and locked storage areas for poisonous and toxic chemicals that are not being held for sale					
4.	Do you ensure that poisonous and toxic chemicals are properly labeled					
5.	Do you use pesticides in accordance with the Theater Insecticide, Fungicide, and Rodenticide SOPs					
6.	Do you know what poisonous and toxic chemicals should be on the premises and keeping track of them					
7.	Do you investigate missing stock or other irregularities outside a normal range of variation and alert Theatre security elements about unresolved problems, when appropriate					

10. Operations						
Question #	Question	Yes	No	NA	Do Not Know	Actions to rectify non-Compliance
1.	Do you use only known, appropriately licensed or permitted (where applicable) contract manufacturing and packaging operators and sources for all incoming					

	materials, including ingredients, compressed gas, packaging, labels, and materials for research and development					
2.	Do you take reasonable steps to ensure that suppliers, contract operators and transporters practice appropriate food security measures					
3.	Do you authenticate labeling and packaging configuration and product coding/expiration dating systems (where applicable) for incoming materials in advance of receipt of shipment, especially for new products					
4.	Do you request locked and/or sealed vehicles/containers/railcars, and, if sealed, obtain the seal number from the supplier and verify upon receipt, making arrangements to maintain the chain of custody when a seal is broken for inspection by a governmental agency or as a result of multiple deliveries					
5.	Do you request that the transporter have the capability to verify the location of the load at any time, when practical					
6.	Do you have establish delivery schedules, not accepting unexplained, unscheduled deliveries or drivers, and investigate delayed or missed shipments					
7.	Do you supervise off-loading of incoming materials, including off hour deliveries					
8.	Do you reconcile the product and amount received with the product and amount ordered and the product and amount listed on the invoice and shipping documents, taking into account any sampling performed prior to receipt					
9.	Do you investigate shipping documents with suspicious alterations					
10.	Do you inspect incoming materials, including ingredients, compressed gas, packaging, labels, product returns, and materials for research and development, for signs of tampering, contamination or damage or "counterfeiting", when appropriate					
11.	Do you evaluate the utility of testing incoming ingredients, compressed gas, packaging, labels, product returns, and materials for research and development for detecting tampering or other malicious, criminal, or terrorist action					
12.	Do you reject suspect food, or food from unapproved sources?					
13.	Do you alert appropriate law enforcement and public health authorities about evidence of tampering, "counterfeiting" or other malicious, criminal, or terrorist action					

11. Storage						
Question #	Question	Yes	No	NA	Do Not Know	Actions to rectify non-Compliance
1.	Do you have a system for receiving, storing, and handling distressed, damaged, returned, and rework products that minimizes their potential for being compromised or to compromise the security of other products					
2.	Do you keep track of incoming materials and materials in use, including ingredients, compressed gas, packaging, labels, salvage products, rework products, and product returns					
3.	Do you investigate missing or extra stock or other irregularities outside a normal range of variability and report unresolved problems to appropriate law enforcement and public health authorities, when appropriate					
4.	Do you store product labels in a secure location and destroy outdated or discarded product labels					
5.	Do you minimize reuse of containers, shipping packages, cartons, etc., where practical					
12. Finished Products						
Question #	Question	Yes	No	NA	Do Not Know	Actions to rectify non-Compliance
1.	Do you ensure that public storage warehouse and shipping operations (vehicles and vessels) practice appropriate security measures					
2.	Do you perform random inspection of storage facilities, vehicles, and vessels					
3.	Do you evaluate the utility of finished product testing for detecting tampering or other malicious, criminal, or terrorist actions					
4.	Do you request locked and/or sealed vehicles/containers/railcars and provide the seal number to the consignee					
5.	Do you request that the transporter have the capability to verify the location of the load at any time					
6.	Do you establish scheduled pickups and reject unexplained, unscheduled pickups					
7.	Do you keep track of finished products					

8.	Do you investigate missing or extra stock or other irregularities outside a normal range of variation and alerting appropriate law enforcement and public health authorities about unresolved problems, when appropriate					
9.	If applicable to your operation, do you advise sales staff to be on the lookout for counterfeit products and to alert management if any problems are detected					

13. Access to Computer Systems

Question #	Question	Yes	No	NA	Do Not Know	Actions to rectify non-Compliance
1.	Do you restrict access to computer process control systems and critical data systems to only those with appropriate clearance					
2.	Do you eliminate computer access when a staff member is no longer associated with the establishment					
3.	Do you establish a system of traceability of computer transactions					
4.	Do you review the adequacy of virus protection systems and procedures for backing up critical computer based data systems					
5.	Do you validate the computer security system					

Completed by: _____ Position: _____ Location: _____ Date: _____

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