

HACCP <i>Europa.com</i>	QUALITY SYSTEMS MANUAL	<i>Issue: 1</i>	<i>Ref No:</i>
		<i>Issued by:</i>	
		<i>Approved by:</i>	
	Security Management	<i>Issue date:</i>	
		<i>Approval date:</i>	
		<i>Page: 1 of 5</i>	

PURPOSE: To ensure all precautions are taken to prevent product contamination.

RESPONSIBILITY: The Department Managers is responsible for ensuring this procedure is communicated and adhered to by all staff.

INSTRUCTIONS:

Food Security Plan Management

1. A food security management team and a food security management coordinator should be identified for each plant or company. Each member should be assigned clear responsibilities.
2. A food security plan using established risk management principles should be developed and implemented. The plan should include procedures for handling threats and actual cases of product tampering and an evacuation plan for each facility.
3. Corrective action taken in all cases of product tampering should ensure that adulterated or potentially injurious products do not enter commerce.
4. The plan should include the immediate recall of adulterated products from trade and consumer channels. Safe handling and disposal of products contaminated with chemical or biological agents should also be included in the plan.
5. A relationship should be established with appropriate analytical laboratories for possible assistance in the investigation of product-tampering cases.
6. Procedures for notifying appropriate law enforcement and public health officials when a food security threat is received, or when evidence of actual product tampering is observed, should be detailed in the plan.
7. Specially designated entry points for emergency personnel should be identified in the plan.
8. Current local, State Security contacts and public health officials should be listed in the plan. This list should be updated regularly.
9. Members of the food security management team should be trained in all provisions of the plan. Audits should be conducted periodically. The plan should be periodically reviewed and revised as needed.
10. All employees should be encouraged to report any sign of possible product tampering or break in the food security system. Consider implementing an award system or establishing performance standards related to food security consciousness.

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	Security Management	<i>Issue date:</i>	
		<i>Approval date:</i>	
		<i>Page: 2 of 5</i>	

11. All threats and incidents of intentional product tampering should be immediately investigated and reported to the local law enforcement officials and the Food Safety Inspector.

Outside Security

1. Plant boundaries should be secured to prevent unauthorized entry. "No Trespassing" signs should be posted.
2. Integrity of the plant perimeter should be monitored for signs of suspicious activity or unauthorized entry.
3. Outside lighting should be sufficient to allow detection of unusual activities.
4. All access points into the establishment should be secured by guards, alarms, cameras or other security hardware, consistent with national and local fire and safety codes.
5. Emergency exits should be alarmed and have self-locking doors that can be opened only from the inside.
6. Doors, windows, roof openings, vent openings, trailer bodies, railcars and bulk storage tanks should be secured (e.g., locks, seals, sensors) at all times.
7. Outside storage tanks for hazardous materials and potable water supply should be protected from, and monitored for, unauthorized access.
8. An updated list of plant personnel with open or restricted access to the establishment should be maintained at the security office.
9. Entry into establishments should be controlled by requiring positive identification (e.g., picture IDs, sign-in and sign-out at security or reception, etc.).
10. Incoming and outgoing vehicles (both private and commercial) should be inspected for unusual cargo or activity.
11. Parking areas for visitors or guests should be situated at a safe distance from the main facility. Vehicles of authorized visitors, guests and employees should be clearly marked (placards, decals, etc.).
12. Truck deliveries should be verified against a roster of scheduled deliveries. Unscheduled deliveries should be held outside the plant premises, if possible, pending verification of shipper and cargo.

General Inside Security

1. Restricted areas inside the plant should be clearly marked and secured.
2. Access to central controls for airflow, water systems, electricity and gas should be restricted and controlled.
3. Updated plant layout schematics should be available at strategic and secured locations in the plant.
4. Airflow systems should include a provision for immediate isolation of contaminated areas or rooms.

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		<i>Issue date:</i>	
		<i>Approval date:</i>	
		<i>Page: 3 of 5</i>	

5. Emergency alert systems should be fully operational and tested, and locations of controls should be clearly marked.
6. Access to in-plant laboratory facilities should be strictly controlled. Comprehensive and validated security and disposal procedures should be in place, particularly for the control of reagents, hazardous materials and live cultures of pathogenic bacteria.
7. Visitors, guests and other non-plant employees (contractors, salespeople, truck drivers, etc.) should be restricted to nonproduct areas unless accompanied by an authorized plant representative.
8. Computer data systems should be protected using passwords, network firewalls and effective and current virus detection systems.

Slaughter and Processing Security

1. Procedures should be in place to monitor the operation of pieces of equipment (blenders, choppers, poultry chill tanks, etc.) to prevent product tampering.
2. A program should be in place to ensure the timely identification, segregation and security of all products involved in the event of deliberate product contamination.
3. A validated procedure should be in place to ensure the traceback and trace-forward of all raw materials and finished products.
4. Projected and actual use of restricted ingredients should be verified at the end of each day, preferably by someone other than the employee who logs the ingredient.
5. Returned goods should be examined for evidence of possible tampering before salvage or use in rework. Records should be kept on the use of all returned goods in rework.
6. The integrity of packaging materials of all spices and restricted ingredients (including premixes prepared in the plant) should be verified before use.
7. Accurate inventory of finished products should be maintained to allow detection of unexplained additions to or withdrawals from existing stock.
8. Access to product production or holding areas should be restricted to plant employees.
9. Plants should use a system that ensures clear identification of personnel to their specific functions.
10. An updated daily or shift roster of plant personnel should be maintained and distributed to plant supervisors.

Storage Security

1. Controlled access should be maintained for all product and ingredient storage areas. An access log may be maintained.
2. Security inspection of all storage facilities (including temporary storage vehicles) should be performed regularly, and the results logged.
3. A daily inventory of hazardous chemicals or other products should be made, and all discrepancies should be investigated immediately.

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		<i>Issue date:</i>	
		<i>Approval date:</i>	
		<i>Page: 4 of 5</i>	

4. Hazardous chemical storage areas or rooms should be secured and isolated from other parts of the plant. In addition, they should be constructed and safely vented in accordance with national or local building codes.
5. All outgoing shipments should be sealed with tamper-proof, numbered seals that are included on the shipping documents.
6. Establishments should require that incoming shipments be sealed with tamper-proof, numbered seals, and that the seal numbers be shown on the shipping documents for verification prior to entry to the plant.
7. Shipping documents with suspicious alterations should be thoroughly investigated.
8. All trailers on the premises should be locked and sealed when not being loaded or unloaded.
9. A policy for off-hour deliveries should be established to ensure prior notice of such deliveries and require the presence of an authorized individual to verify and receive the shipment.
10. Packaging integrity of all incoming shipments should be examined at the receiving dock for evidence of tampering.
11. Advance notification (by phone, e-mail, fax) should be required from suppliers for all incoming deliveries. Notification should include pertinent details about the shipment, including the name of the driver.
12. The Food Safety Inspector should be notified immediately when animals with unusual behavior and symptoms are received at the plant.
13. Loading docks should be secured to avoid unverified or unauthorized deliveries.
14. The integrity of food security measures should be a significant consideration in the selection of suppliers of meat and nonmeat ingredients, compressed gas, packaging materials and labels.

Water and Ice Supply Security

1. Outside access to wells, potable water tanks and ice-making equipment should be secured from unauthorized entry.
2. In-plant ice-making equipment and ice storage facilities should have controlled access.
3. Potable and non-potable water lines in food processing areas should be inspected periodically for possible tampering.
4. The plant should arrange for immediate notification by local health officials in the event the potability of the public water supply is compromised.

Personnel Security

1. A system of positive identification/recognition of all plant employees should be in place.
2. Procedures should be established for controlled entry of employees into the plant during both working and non-working hours.

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		<i>Page: 5 of 5</i>	

3. New hires (seasonal, temporary, permanent, and contract workers) should be subjected to background checks before hiring.
4. Orientation training on security procedures should be given to all plant employees.
5. The plant should establish and enforce a policy on what personal items may and may not be allowed inside the plant and within production areas.

MONITORING:

Regular audits / inspections of manufacturing areas and controls must be in place to ensure that procedures are effective and working.

VERIFICATION AND RECORD KEEPING:

Regular audits / inspections of manufacturing areas and controls must be in place to ensure that procedures are effective and working.

Internal audits records must be completed, which will include:

- non-conformances
- corrective action
- responsibility
- date of completion

RECORDS APPLIED TO THIS PROCEDURE:

- Internal Audit records

DOCUMENTATION RETENTION:

The records applied to this procedure are to be kept on file for a minimum of 3 years.