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Food Security
Reframe Your View of Security

Food Security is NOT
an extension of
Food Safety

Usually Framed As ..

- Food Safety = Prevention of accidental contamination
- Food Security = Prevention of malicious contamination
However

Food is NOT the enemy

People who would harm
the company’s interests
are the enemy

Therefore ...

Security is about people

As Security Professionals
We Ask ...

Who would want to harm the company’s
interests?
Why?
How?
Where?
When?

What can we do to prevent them
from conducting any type of attack?
More Enlightened Way to Look at Security

Which security measures historically have proven to be the MOST effective at deterring the most likely attack scenarios which could cause the greatest harm to the company? How are you going to know them?

Current Degree of Readiness Across Government and the Industry

Considerable confusion about protecting Confusing efforts with results Unwarranted sense of readiness Creating a self-fulfilling prophecy

View Agency Regulations / Standards with a Different Security Perspective

Fundamental difference between "prevention" and "response"
Examples of agencies referring to "prevention" but really meaning "response"

Examples of This Confusion
- "We're developing the new medicines and vaccines to protect our citizens from disease or bioterrorism" (12/3/04)
- "The government is creating a new generation of technologies to guard against terror attacks on our food supply" (10/7/04)
- "New rules to protect the nation from a biological terrorist attack" (12/7/04)
- "Publication of this record-keeping rule represents a milestone in U.S. food safety and security. We have a lot of work yet to do, but our nation is now more prepared than ever before to protect the public against threats to the food supply" (12/6/04)
- "...the risk of a terror attack on the food supply is low because of steps by the government to tighten its food security web" (12/6/04)

The Focus Is On
containment of the effects of an attack and protecting the public

after an attack ...

not on prevention
Which of the Following Regulations Would Actually Prevent An Incident?

Registration
Advance notice
Increased detention authority
Increased record keeping requirements

Is There Really a Terrorist “Threat” to Contaminate our Food?

- Because they “could” does not mean they will
- Difference between being vulnerable and a threat
- Being vulnerable: An attack COULD happen
- A threat: A specific engagement HAS occurred

FDA Security Guidelines

- 111 specific security standards
- No sense of which are most important
- No sense of type of attacker / methodologies
- “Good Security Practice” not identified
- Encyclopedia of “conventional wisdom”
- Many are not helpful
- Some are unhelpful
- They have been accepted as the industry standard
- Customer, associations, 3rd party food safety audit checklists rephrased collections
Array of Agency Suggested Security Standards

- FDA
- CTPAT
- Department of Agriculture
- FSIS
- DOT
- etc.

9/11 Commission Report

"The private sector remains largely unprepared for a terrorist attack.

"... the lack of a widely embraced private sector preparedness standard (is) a principal contributing factor to this lack of preparedness."

Two Recent GAO Audits

Objective:

Determine why food security has not been more widely implemented across the industry
GAO Audit Methodology

- Interviewed leading association officials
- Visited / audited SIX processing facilities
- Talked with agency food safety inspectors

Findings

- Association officials:
  - Surveys showed much has been done
  - Industry leaders do NOT want regulations
  - Therefore: They are doing "a lot"
- SIX audits:
  - Found some things have been implemented
- Agency inspectors:
  - Not trained to even discuss security

GAO Recommendations

1. Review statutory authority with congress
2. Train inspectors to be able to discuss security with facility managers
Problems With the GAO Audits

- Confused effort with results
- Of course industry does not want to be regulated
- Association officials produced survey results which demonstrate that much has been done ...
- However, much of what has been done has had very little deterrent effect
- Did not audit the effectiveness of security

Homeland Security Secretary
Tom Ridge
January 25, 2005

- "Private industries have made some very significant investments to tighten security ..."
- "Critics say .. companies .. haven't done nearly enough to protect against an attack that could kill and injure tens of thousands of people."
- "company leaders know that if you don't do it in the foreseeable future, you'll be told to do it"

Was Optimistic about the New FSIS Standards

Wanted to develop a set of standards that would be more credible, more industry friendly, and actually be implemented.
However ...

more of the same

Agency & Industry Focus Is On ...

Bioterrorist attack on the food industry by terrorists

Recent Senior Official's Comments

"I worry about it every night. For the life of me, I don't know why they haven't attacked our food supply yet."

"It would be so easy to do"

(12/3/04)
The Effect of Such Comments

Effect of the Media

• Constantly highlighting ...
• Food industry's vulnerability
• Which bioterrorism agents best to use
• Where / how to acquire them

For All the Well-Intended Motives ...

Public discussion of
the industry's greatest vulnerabilities,
most lethal bioterrorism agents,
their characteristics / effects,
for which we have no antidotes,
how / where to acquire them
serve to ...
attract, encourage, enlighten, educate, inspire, taunt
the enemy

“Human Safety Trial To Start On Vaccine For Deadly Toxin”

- ...as little as 500 micrograms of ricin – about what fits on the
  head of a pin – is enough to kill an adult. Lethal doses depend on
  how the poison is delivered – by powder, mist, pellet or dissolved
  in water.
- “The poison can be made from waste left from processing castor
  beans.”
- “Because castor beans are easy to obtain and the poison remains
  potent despite exposure to extreme temperatures, government
  officials worry that it could become a tool of terrorists.
- “Unless treated quickly, there is no antidote. Symptoms arrive
  late and can be confused with those of other illnesses.”

December 1, 2004

Justification

“THEY already know all about these things.”

Maybe some do
but
there are many others listening
and learning
 Reuters: July 28, 2004 – Irvine, CA

Gerber Baby Food Laced with Ricin

- "Two jars of Gerber baby food sold in Southern California tested positive for traces of the highly toxic poison ricin on Wednesday, prompting police to warn parents to check for tampering before serving prepared food to their children."
- First incident occurred May 31st
- Second incident occurred June 16th
- Why ricin?
- Why no public warning until July 28th?

Effect of Open Discussions / Coverage

- What are the effects of pointing out our vulnerabilities / potency of bioterrorism agents / amount of damage possible / best possible attack scenarios?
- Encourages...
  - deranged members of society, and
  - disgruntled employees
  - to do the same thing the terrorists could do
- Are we sending the right message?
Will Contend with a Variety of Customer Food Security Audits

- Each reflects their own view of the FDA guidelines and standards
- Many are developed by food safety people, not security experts
- Select security measures they believe are most important ("conventional wisdom")
- Now also add weighting factors to the questions

Food Security Audits and Inspections

Are being conducted by food safety people, not security professionals.

Implications ...

A Security Program May Look Adequate to the Casual Observer

...
But It May Not Function Very Well If It Is Ever Needed

Fundamental Issue
Long-term relationship of faith between you and your key customers supported by years of investment in effective food safety programs is now jeopardized by failing to meet expectations for your food security program.

Their Message ..
If we don't like your security program we are not going to buy from you any more. One major customer compares food security audit scores between its competing suppliers.
However ...

many such customer audits
do not reflect, emphasize or give credit for
Good Security Practice
and the most important measures
to deter most likely attack scenarios

Developed ...

from a food safety / HACCP perspective
but remember
security is a very different discipline

It's about people,
not about food

Food Security Audit
Sample Checklist Expectations

- "Is access to the grounds of the facility restricted through the use of
  barriers, i.e. fences, walls, etc.? ... Is there a means to control vehicle
  access onto the property? ... If gates are used, are they locked when not
  in use?" (ConAgra)

- "Effective measures are taken to restrict unauthorized access to the
  grounds (in/and security fencing, gates closed and locked, surveillance
  by cameras and / or security guards, adequate lighting, company issued
  access cards, security patrols, etc." (WalMart)

- Improve onsite security programs such as restricting rights of entry and
  exit, locking up storage bulk ingredient containers and mounting video
  surveillance at important internal processing hubs. Provide metal or
  metal-clad doors on facilities." (McDonalds)

- "Is perimeter access protected with fencing or other appropriate
  deterrent?" (Yum! Brands)
Major Food Company's Food Security Audit Checklist

- "Ensure that there are controls in place to verify the identity of new personnel joining the company, temporary employees and contractors."
- "All new employees should undergo induction training which should cover site and product security."
- "Is access to the site restricted to employees only, and are there entry restrictions to all manufacturing & storage areas?"
- "Are all visitors identifiable and checked by a security service on arrival and departure?"
- "Are there surveillance cameras on site, covering both external and internal key production areas?"

Not Reflected …

- Different Risk Levels
- Practical realities / constraints of physical layout
- The fact that not all security measures work against all types of potential attackers
- Whether the expected measures would really be effective or not

Example of the Problem
1st Principle of Security

Confidentiality

What Would Happen If ...

- You asked to see the security details at the bank where you are a customer?
- You asked to see the security details at the airline/airport where you are a customer?

What are you going to do if a 3rd party auditor or an agency inspector asks to see a copy of your food security plan?
Conclusion

- Agencies going after least likely scenario with tools that would not work
- Modest, if any, contribution to prevention
- Misplaced faith in "conventional wisdom"
- Vast amounts of money being spent
- None going to help industry prepare
- Industry making many improvements, but do they produce an effective deterrent?

How Could the Agencies Get It So Wrong?

These agencies, associations, 3rd party food safety auditing companies are not security experts

Would Be Like Asking ASIS *

to develop standards for a food safety program

* American Society for Industrial Security
While the Official Focus is on a BioTerrorism Attack on the Food Industry ...

The far more likely thing to happen is an internal attack by a disgruntled employee.

Disgruntled Employee
- Has access
- Has knowledge
- Has opportunity
- Media may encourage him
- External security program does not protect you against what he can do
- Do not give him a reason
- He CAN do it if he gets angry enough

Fortunately
- Good Security Practices are also available to defend against the internal attack scenario
- Training in threat assessment
- Intervene early with consistent discipline
- Need to add security considerations to human resources policies / procedures
- Intervention protocols for handling dangerous, threatening situations
My Recommendations

Calibrate Good Security Practice
Establish a commitment that "We secure to a higher standard"
Outline and begin implementing or improving a comprehensive, effective security program which also reflects the internal risk
Audit your own progress using an enlightened audit protocol
Meet with key customers to explain your commitment and review your suppliers & copackers

Management Must Make A Choice

Do you build a security program to try to meet the evolving collections of security expectations from customers / 3rd party food safety auditors?
OR
Do you implement an effective security program which reflects Good Security Practice which will actually work if needed?

Facility Security Plan*

Security Mission Statement
Modified OBPCG audit settings
Security principles
Dealing with food security audits

External Program
- Application of Concrete Circles
- Separate incoming traffic by type
-燕port access control design
- Building level security requirements
- Office lobby security
- Visitor control protocols
- Areas of higher vulnerability

Internal Program
- Review of HR policies / procedures
- Security training for all managers
- Tools / training for early detection / management of threats
- Intervening protocols
- Security training for supervisors

General Security Elements
- Security audit of all facilities
- Security protocols for product security
- Security training for all security teams
- Temporal control on security measures
- Emergency response protocols
- Exclusions for support curriculum
Haunting Questions

- Would it matter whether a terrorist or a disgruntled employee added the agent?
- Would we ever know?
- How would we know at which link in the food chain the agent was added?

We need a more enlightened approach

Security Consulting
Services Available
Ray Pettit Enterprises
- Practical Security Solutions
- Facility Security Reviews
- Modified ORM Risk Assessments
- Security Team Training
- Protection Against Disgruntled Employees
- Security Conference for Suppliers
- Assistance with Threatening Situations
Ensure ...

1. Sound security measures being used
2. Maximize effective protection for the least possible cost
3. Your program will "work" if ever needed
4. Your suppliers' security reflects the same level of effectiveness

If you would like more information give me a business card after this session

Thank You

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