



FOOD DEFENSE VERIFICATION PROGRAM MEAT, POULTRY, EGG AND FISH PRODUCTS PROCESSING PLANT CHECKLIST	
Name of Applicant:	Date of Audit:
Plant Number:	List below all off-premise freezers used by the facility. Name(s):
Address of Facility:	
Facility Phone Number:	Facility Contact Person: Name:
Auditor's Name:	Title: Email:
AUDIT STATUS	
Audit Type: Original On-site Audit <input type="checkbox"/> (or) Corrective Actions Audit <u>1/</u> <input type="checkbox"/>	
If Corrective Action Audit, then check applicable below:	
<ul style="list-style-type: none"> <li>• First Corrective Action Audit <u>2/</u> <input type="checkbox"/> (or) Second Corrective Action Audit <u>3/</u> <input type="checkbox"/></li> <li>• Desk <input type="checkbox"/> (or) On-site <input type="checkbox"/></li> <li>• Date Auditor Received Corrective Actions: _____</li> </ul>	
APPROVED <input type="checkbox"/> (or) PENDING CORRECTIVE ACTION RESPONSE <input type="checkbox"/>	
<p><u>1/</u> Auditor will receive written corrective action responses (CARs) from the facility representative within 14 calendar days from the day of the original on-site audit. Auditor will close out all CAR's within 14 calendar days from the day the CAR's were submitted by the facility representative.</p> <p><u>2/</u> If CARs from the facility representative are not acceptable during the first corrective action audit, the applicant will have 7 additional calendar days to provide a written CAR that effectively closes out the remaining non-conformances.</p> <p><u>3/</u> USDA, AMS Commodity Procurement Staff will be notified if CARs remain open after the second corrective actions audit.</p>	



## FOOD DEFENSE DEFINITIONS

- **Secured Access:** Secured access prevents unauthorized access to the premises.
- **Controlled Access:** Controlled access prevents unauthorized access into processing and food handling areas of the facility. Additionally, monitoring controls are necessary to safeguard product against intentional contamination.
- **Restricted Access:** Restricted access prevents unauthorized access to critically vulnerable buildings, rooms, and areas.
- **Monitor:** A method of supervising or observing an activity.
- **Facility:** A building where products and ingredients are received and food products are produced, processed, and/or stored.
- **Premises:** The physical site or location of the business under control of management. This includes the facility and associated parking lots, offices, access roadways, off-site laboratories, and other areas under management control.

### 1. FOOD DEFENSE PLAN MANAGEMENT

YES	NO	N/A	EVALUATION ELEMENT
			<p><b>1a. Does this facility have a documented food defense plan that includes emergency contacts and telephone numbers?</b></p> <ul style="list-style-type: none"> <li>• A food defense plan shall be developed and implemented.</li> <li>• The plan shall include procedures for handling threats and actual cases of product tampering and an evacuation plan for each facility.</li> <li>• 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, shall be detailed in the plan.</li> <li>• Specially designated entry points for emergency personnel shall be identified in the plan.</li> <li>• Current local, State, and Federal Government Homeland Security contacts and public health officials shall be listed in the plan along with their respective phone numbers. This list shall be assessed and updated regularly.</li> <li>• The plan shall 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.</li> <li>• A program shall be in place to ensure the timely identification, segregation, and security of all products involved in the event of deliberate product contamination.</li> </ul>
			<p><b>1b. Is there a designated person or team to oversee and implement the food defense plan?</b></p> <p><b>Name(s):</b></p> <p><b>Phone:</b></p> <ul style="list-style-type: none"> <li>• A food defense management team or coordinator shall be identified for each plant or company.</li> <li>• Each member shall be assigned clear responsibilities.</li> </ul>



			<p><b>1c. Is the food defense plan reviewed and reassessed periodically by management to assure it remains relevant to the operation?</b></p> <ul style="list-style-type: none"> <li>• Food security assessments of the facility should be conducted regularly (at least annually) by plant officials to verify key provisions of the plan.</li> </ul>
			<p><b>1d. Have facility employees received training in food defense, and is the training documented?</b></p> <ul style="list-style-type: none"> <li>• Food defense training on security procedures shall be given to all facility employees. Facility representatives may access free food defense awareness training for their employees at: <a href="http://www.fda.gov/Food/FoodDefense/ToolsEducationalMaterials/ucm353774.htm">http://www.fda.gov/Food/FoodDefense/ToolsEducationalMaterials/ucm353774.htm</a></li> <li>• Review food defense training records for employees.</li> <li>• Verify food defense training materials are applicable for all employees.</li> </ul>
			<p><b>1e. Are employees instructed to report signs of possible product tampering or suspicious activity relative to the food defense program?</b></p> <ul style="list-style-type: none"> <li>• All employees shall be instructed to report any sign of possible product tampering or break in the food security system.</li> </ul>
<b>2. OUTSIDE AND INSIDE SECURITY OF PROCESSING AND STORAGE</b>			
<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>EVALUATION ELEMENT</b>
			<p><b>2a. Are signs such as "No Trespassing," "No Admittance," or "Authorized Employees Only" posted at the facility's boundaries?</b></p> <ul style="list-style-type: none"> <li>• "No Trespassing" signs or the like should be posted at the facility's boundaries.</li> </ul>
			<p><b>2b. Is the facilities outside premises secured to prevent entry by suspicious activity or unauthorized persons (e.g., security fence, video, security service, etc.)?</b></p> <ul style="list-style-type: none"> <li>• Integrity of the facility perimeter should be secured, and may be monitored for signs of suspicious activity or unauthorized entry.</li> <li>• All entry ways into the facility may be secured by guards, alarms, cameras, etc.</li> </ul>
			<p><b>2c. Do emergency exits have secure doors that are self-locking, fitted with alarms, or monitored?</b></p> <ul style="list-style-type: none"> <li>• Emergency exit doors are secured via self-locking device, fitted with alarms, or monitored.</li> <li>• Verify via observation.</li> </ul>
			<p><b>2d. Are exterior lights located at exterior entry ways to the facility?</b></p> <ul style="list-style-type: none"> <li>• Outside lights should be located at exterior entry ways to the facility to allow detection of unusual activities.</li> </ul>
			<p><b>2e. Is positive identification required to control entry of visitors to the facility (e.g., picture IDs, sign-in/sign-out, etc. at entrance)?</b></p> <ul style="list-style-type: none"> <li>• Entry into facility should be controlled by requiring positive identification (e.g., picture IDs, sign-in and sign-out at security or reception, etc.) or be monitored, which may include the use of surveillance cameras and/or periodic visual observation by designated employees. Documentation and records are useful to support monitoring activities.</li> </ul>



			<p><b>2f. When entering or leaving a restricted gated area, are vehicles randomly inspected for unusual cargo or activity?</b></p> <ul style="list-style-type: none"> <li>To include a random inspection of all vehicles (e.g. commercial, visitors, employee, etc.).</li> </ul>
			<p><b>2g. Is active surveillance of the interior of the facility maintained?</b></p> <ul style="list-style-type: none"> <li>Facility interior shall be monitored manually or mechanically daily using records or monitoring of internal surveillance (e.g., shift rosters, attendance logs, etc. confirming areas are monitored).</li> </ul>
			<p><b>2h. Are all restricted areas (e.g., chemical storage, ingredient storage, etc.) within the facility clearly marked and do they include the use of locks or key cards that prevents unauthorized access to critically vulnerable areas?</b></p> <ul style="list-style-type: none"> <li>Restricted areas inside the facility shall be clearly marked and include the use of locks or key cards.</li> <li>Restricted access may be augmented with monitoring.</li> <li>Access to in-plant laboratory (including laboratory reagents, hazardous materials, etc.) shall be restricted.</li> <li>Documentation and records are useful to establish and support restricted access.</li> </ul>
			<p><b>2i. Are visitors, guests, and other non-facility employees (e.g., contractors, salespeople, truck drivers, etc.) restricted to non-product areas unless accompanied by an authorized facility employee?</b></p> <ul style="list-style-type: none"> <li>Visitors, guests, and other non-facility employees (contractors, salespeople, truck drivers, etc.) should be restricted to non-product areas unless accompanied by an authorized plant representative.</li> </ul>
<b>3. SLAUGHTER AND PROCESSING SECURITY</b>			
<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>EVALUATION ELEMENT</b>
			<p><b>3a. Are procedures in place to regularly monitor the processing operations (i.e., blenders, choppers, chill tanks, etc.) where large amounts of exposed product are handled to prevent product tampering?</b></p> <ul style="list-style-type: none"> <li>Policy describes procedures, frequency, and responsibility.</li> <li>Security monitored manually or mechanically as demonstrated by daily documentation or observations.</li> </ul>
			<p><b>3b. Are ingredient packaging materials examined for evidence of tampering before use?</b></p> <ul style="list-style-type: none"> <li>The integrity of packaging materials of all spices and restricted ingredients (including premixes prepared in the facility) shall be verified before use.</li> </ul>
			<p><b>3c. Are there procedures and records maintained to trace-back raw materials to suppliers and trace-forward finished products to recipients?</b></p> <ul style="list-style-type: none"> <li>Procedures and records shall be in place to ensure the trace-back of all raw materials and trace-forward of finished products to recipients.</li> </ul>



4. SHIPPING AND RECEIVING SECURITY			
YES	NO	N/A	EVALUATION ELEMENT
			<p><b>4a. Are loaded trailers on the premises maintained under lock and/or seal? Are empty trailers inspected prior to loading?</b></p> <ul style="list-style-type: none"> <li>• All loaded trailers on the premises should be locked and/or sealed.</li> <li>• A documented procedure should be in place to demonstrate that trailers are inspected prior to loading.</li> </ul>
			<p><b>4b. Is the loading and unloading of vehicles transporting raw materials, finished products, or other materials used in food processing closely monitored?</b></p> <ul style="list-style-type: none"> <li>• Procedures shall be in place to monitor the loading and unloading of vehicles transporting raw materials, finished products, or other materials used in food processing.</li> <li>• Security in this area is monitored manually or mechanically.</li> </ul>
			<p><b>4c. Are outgoing USDA commodity contract shipments being delivered to contracted destination(s) sealed with a traceable, tamper-evident, commercial seals or high security seals on transports?</b></p> <ul style="list-style-type: none"> <li>• Seal numbers shall be recorded on the shipping documents.</li> </ul>
			<p><b>4d. Is access to loading docks controlled to avoid unauthorized deliveries?</b></p> <ul style="list-style-type: none"> <li>• Loading docks shall be controlled.</li> <li>• Loading docks shall be monitored, which may include the use of surveillance cameras and/or periodic visual observation by designated employees.</li> </ul>
			<p><b>4e. Are incoming shipments of raw products, ingredients, and finished products inspected and is a log maintained at the receiving dock for evidence of tampering?</b></p> <ul style="list-style-type: none"> <li>• All incoming shipments shall be examined at the receiving dock for evidence of tampering.</li> <li>• Records should be maintained.</li> </ul>
			<p><b>4f. Are ingredient suppliers selected with consideration of food defense measures implemented by the suppliers?</b></p> <ul style="list-style-type: none"> <li>• Security measures shall be a determinant in the selection of suppliers of meat and non-meat ingredients, compressed gas, packaging materials, and labels.</li> </ul>
			<p><b>4g. Are all returned goods examined for evidence of possible tampering before salvage or use in rework?</b></p> <ul style="list-style-type: none"> <li>• Returned goods shall be examined for evidence of possible tampering before salvage or use in rework.</li> <li>• Records shall be maintained on the use of all returned goods in rework.</li> </ul>



5. STORAGE SECURITY			
YES	NO	N/A	EVALUATION ELEMENT
			<p><b>5a. Are periodic security inspections of storage facilities (including temporary storage vehicles) conducted?</b></p> <ul style="list-style-type: none"> <li>• Security inspection of all storage facilities (including temporary storage vehicles) shall be performed regularly (at least monthly).</li> <li>• Records should be maintained on facility storage security inspections.</li> </ul>
			<p><b>5b. Is the inventory of restricted ingredients (e.g., nitrites) reconciled and documented against the actual use of such ingredients on a daily basis?</b></p> <ul style="list-style-type: none"> <li>• A daily inventory of restricted ingredients shall be maintained, and all discrepancies shall be investigated immediately.</li> </ul>
			<p><b>5c. Are product labels and packaging held in a controlled area to prevent theft and misuse?</b></p> <ul style="list-style-type: none"> <li>• Labels and packaging materials shall be held in a controlled area to prevent theft and misuse.</li> <li>• Product labels and packaging areas shall be monitored, which may include the use of surveillance cameras and/or periodic visual observation by designated employees.</li> </ul>
			<p><b>5d. Is the inventory of finished products regularly checked for unexplained additions and withdrawals from existing stock?</b></p> <ul style="list-style-type: none"> <li>• Accurate inventory of finished products shall be maintained to allow detection of unexplained additions to or withdrawals from existing stock.</li> <li>• Verify via policy and documentation.</li> </ul>
6. WATER AND ICE SECURITY			
YES	NO	N/A	EVALUATION ELEMENT
			<p><b>6a. Is access to water sources such as wells restricted (e.g., by locked door/gate or limiting access to designated employees)?</b></p> <ul style="list-style-type: none"> <li>• Access to wells and potable water tanks shall be restricted from unauthorized entry.</li> <li>• Potable and non-potable water lines in food processing areas shall be inspected periodically for possible tampering.</li> <li>• Access to water sources shall include the use of locks, seals, or key cards.</li> <li>• Restricted access may be augmented with monitoring.</li> <li>• Documentation and records are useful to establish and support restricted access.</li> </ul>
			<p><b>6b. Is access to ice-making equipment restricted and ice storage facilities controlled?</b></p> <ul style="list-style-type: none"> <li>• Ice-making equipment shall have restricted access.</li> <li>• Access to ice-making equipment may include the use of locks or key cards and may be augmented with monitoring.</li> <li>• Documentation and records are useful to establish and support restricted access.</li> </ul> <p>-----</p>



			<ul style="list-style-type: none"> <li>• Ice storage facilities shall have <u>controlled</u> access.</li> <li>• Ice storage facilities shall be monitored, which may include the use of surveillance cameras and/or periodic visual observation by designated employees.</li> <li>• Documentation and records are useful to establish and support monitoring activities.</li> </ul>
<b>7. MAIL HANDLING SECURITY</b>			
<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>EVALUATION ELEMENT</b>
			<p><b>7a. Is mail handling activity conducted in a separate room or facility away from in-plant food production/processing operations?</b></p> <ul style="list-style-type: none"> <li>• Mail handling activity shall be done in a separate room or facility, away from in-plant food production/processing operations, if possible.</li> </ul>
			<p><b>7b. Are mail-handlers trained to recognize and handle suspicious pieces of mail using U.S. Postal Service guidelines? Helpful information is provided at the following website:</b> <a href="https://about.usps.com/publications/pub166.pdf">https://about.usps.com/publications/pub166.pdf</a></p> <ul style="list-style-type: none"> <li>• Mail handlers shall be trained to recognize and handle suspicious pieces of mail using U.S. Post Office guidelines.</li> </ul>
<b>8. PERSONNEL SECURITY</b>			
<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>EVALUATION ELEMENT</b>
			<p><b>8a. Prior to hiring, are background checks [e.g., employee references and/or immigration status (INS Form I-9)] conducted on all employees and contractors (both permanent and seasonal) who will be working in sensitive operations?</b></p> <ul style="list-style-type: none"> <li>• Sensitive operations as determined by the facility are applicable to the identified food defense risks.</li> </ul>
			<p><b>8b. Are procedures in place to ensure positive identification/recognition of all employees entering the facility?</b></p> <ul style="list-style-type: none"> <li>• A system of positive identification/recognition (e.g., picture IDs, sign-in and sign-out at security or reception, etc.) of all employees entering the facility shall be in place.</li> <li>• An updated daily or shift roster of facility personnel may be maintained and distributed to plant supervisors.</li> </ul>
			<p><b>8c. Are procedures in place controlling access to employees entering the facility during times the plant is not operating (e.g., weekends, Holidays, etc)?</b></p> <ul style="list-style-type: none"> <li>• Procedures shall be established for controlled entry of employees into the facility during times that the plant is not operating.</li> </ul>
			<p><b>8d. Are procedures in place to ensure clear identification of personnel with their specific functions/assignments (e.g., colored garb)?</b></p> <ul style="list-style-type: none"> <li>• Facilities should use a system that ensures clear identification of personnel to their specific functions (e.g., colored garb).</li> </ul>



			<p><b>8e. Is there a policy describing the personal items that are prohibited inside the facility and within production areas?</b></p> <ul style="list-style-type: none"> <li>The facility shall establish and enforce a policy on what personal items may and may not be allowed inside the facility and within production areas.</li> </ul>
<b>9. CONTROLLED ACCESS TO PRODUCTION AND EXTERNAL STORAGE AREAS</b>			
<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>EVALUATION ELEMENT</b>
			<p><b>9a. Is access to product holding areas and external storage facilities limited to authorized personnel only?</b></p> <ul style="list-style-type: none"> <li>Controlled access shall be maintained for all product holding areas for authorized personnel only.</li> <li>Product holding areas shall be monitored, which may include the use of surveillance cameras and/or periodic visual observation by designated employees. Documentation and records are useful to establish and support monitoring activities.</li> </ul>
<p><b>COMMENTS SECTION</b></p> <ul style="list-style-type: none"> <li>List question number and non-conformance to include objective evidence.</li> <li>If Corrective Action Audit with an acceptable response - list the question number, the non-conformance, a brief description of the CAR, and then the words, “adequately addressed”.</li> </ul> <p>If Corrective Action Audit with unacceptable response - list the question number, the non-conformance, a brief description of the CAR, the words, “inadequately addressed,” and a brief description why the corrective action was not acceptable.</p>			