Many people believe that food safety and food defense are the same thing when, in fact, food safety addresses the accidental or unintentional contamination of food, while food defense addresses the deliberate or intentional contamination of food.

We nourish our bodies everyday with the foods and beverages we consume which is why food and beverages are such attractive targets for aggressor groups. Food has the possibility to affect everyone. The impact of deliberate contamination to food is great and could cause widespread fear. It could cause significant public health consequences, devastating impacts to the economy, loss of consumer confidence in the safety of food, and destabilization of political infrastructure. The events of 9/11 have brought the issue of the vulnerability of our food supply to the forefront. The aggressor - whether a disgruntled employee, a criminal, protestor, subversive or terrorist - aims to threaten or inflict some type of physical or psychological harm in order to achieve some objective such as revenge, publicity, death, destruction, etc.

Food establishments should take food defense seriously and develop functional food defense plans that institute control measures against external and internal sources of intentional contamination and adulteration of products. In the U.S. and Canada there are no food defense regulations at this time but guidance and directives are available for companies to aid them in developing their food defense plans.

One way to step into a food defense plan is to use the TEAM (Threat, Evaluation, Assessment, Management) approach to operational risk management.

**Step 1:** Identify the potential threats or hazards to food in all phases of the operation.

**Step 2:** Assess the threats to determine those that have the highest risk (greatest negative impact).

**Step 3:** Analyze threat-control measures, and establish management control, procedures and corrective action plans to eliminate potential threats and/or reduce their risk levels.

**Step 4:** Implement control measures, procedures and corrective action plans and establish management monitoring of each critical exposure point.

**Step 5:** Take corrective actions if there is a break in management control of the critical exposure point.

**Step 6:** Supervise and review the system to verify that TEAM is working and effective.

Sources: FDA, USDA/FSIS, CFIA, Department of Homeland Security

---

**CARVER plus Shock**

CARVER plus Shock is an offensive target prioritization tool developed by Department Of Defense that was modified and adapted for use by USDA and FDA for vulnerability assessments of the food supply. CARVER is an acronym of a set of attributes that are collectively considered to provide a measure of the attractiveness of a target for attack:

**Criticality**—the degree to which public health and economic impacts achieve the attacker’s intent

**Accessibility**—physical access to the target

**Recoverability**—ability of the system to recuperate or recover from an attack

**Vulnerability**—ease of accomplishing attack

**Effect**—amount of loss resulting from attack

**Recognizability**—ease of identifying target

**Shock**—psychological effects of an attack

When developing a food defense plan consider your company’s vulnerabilities keeping in mind the CARVER Shock tool. Start building a food defense plan by performing a vulnerability assessment at each operating location; in this case, one plan does not fit all. Identify risks in the following areas then assess, mitigate, manage and control:

- Physical Facility both Inside and Outside
- Receiving, Shipping and Storage (ingredients, materials, packaging, chemicals, WIP and finished product)
- People—Employees, Contractors, Delivery Driver, Couriers and Visitors
- Suppliers—Validation and Inspection
- Mail
- Information Technology, Systems
- Water and Utilities

Remember, as the old saying goes: “An ounce of prevention is worth a pound of cure.”

Sources: FDA, USDA/FSIS, CFIA, Department of Homeland Security, Department of Defense

Be prepared for the unexpected!
## Food and Drug Administration Recalls (www.fda.gov)

<table>
<thead>
<tr>
<th>Product: Multi-Grain Bread</th>
<th>Incident:</th>
<th>Possible Health Risk: Undeclared Allergen</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Carlsbad, CA firm has issued a voluntary recall of 5,000 to 10,000 loaves of multi-grain bread distributed to locations in Northern California, Arizona, and Nevada. The recalled products contain milk, an undeclared allergen, which may pose a potential serious and life-threatening health risk to milk-allergic individuals. Anyone that may have consumed the product and has had an allergic reaction should seek the advice of a health-care professional. The product is sold in both single loaf 24 oz packages and in overwrapped double loaf packages. The Plant Code “250” is printed on the front of the package. All “Best if Purchased By” dates through August 26 are included in the recall. The company has not had any reports of illnesses or allergic reactions. Consumers that have any of the recalled products should return them to the place of purchase for a full refund. Consumers and media with questions regarding this recall should contact the company or log onto the company’s website.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Product: Raw Milk Cheese</th>
<th>Incident:</th>
<th>Possible Health Risk: Listeria monocytogenes</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Mountain View, MO firm is voluntarily recalling 68,957 pounds of cheese because it may be contaminated with Listeria monocytogenes and also has the potential to be contaminated with Staphylococcus aureus. The recall is a result of regulatory sampling in the State of California. This sampling revealed that two flavors of the cheeses contained the bacteria. The company has suspended the production and distribution of all cheeses and continues their investigation as to the cause of the problem. The company’s raw milk cheese is sold in the lower 48 states via mail order, retail stores, crop sharing associations, and direct delivery. The cheese is packaged in vacuum-sealed plastic packages that are sold as random weight size retail packages. The codes affected by the recall are handwritten on the front of the label, and range from A10 (Jan. 1, 2010) through F250 (June 25, 2010). Consumers who have purchased the cheese should not eat it and contact the company for instructions.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

## United States Department of Agriculture Recalls (www.usda.gov)

<table>
<thead>
<tr>
<th>Product: Canned Meatball Products</th>
<th>Incident:</th>
<th>Possible Health Risk: Undeclared Allergen</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Westville, NJ establishment is recalling approximately 147,667 pounds of canned meatball products because they contain an allergen, egg, which is not declared on the label. The 6 lb., 10 oz cans of the product are being recalled. The canned meatball products were produced on various dates between May 1, 2009 and August 2, 2010. These products were distributed to institutions, including food banks, in Maryland, New Jersey and New York. The problem was discovered by FSIS during a routine inspection at the establishment. FSIS has not received any reports of any adverse reactions due to consumption of these products. Anyone concerned about an allergic reaction should contact a physician. Consumers and media with questions regarding this recall should contact the company.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Product: Ground Beef Products</th>
<th>Incident:</th>
<th>Possible Health Risk: E. Coli O26</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Wyalusing, PA establishment is recalling approximately 8,500 pounds of ground beef products that may be contaminated with E. coli O26. Products subject to recall includes 42-pound cases containing three 14 pound chubs each. The products were reprocessed into consumer-size packages and sold under different retail brand names. The products were produced on June 11, 2010. Products were then shipped to distribution centers in CT and MD for further distribution. FSIS is aware of 3 incidents that have been reported and have been associated to the ground beef products subject to recall. Individuals concerned about an illness should contact a health care provider. Please contact the company with questions.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>


<table>
<thead>
<tr>
<th>Product: Baby Bottle Warmers</th>
<th>Incident:</th>
<th>Hazard: Burn</th>
</tr>
</thead>
<tbody>
<tr>
<td>A San Francisco, CA importer is recalling about 11,000 steam baby bottle warmers manufactured in China and sold nationwide from June 2010 through July 2010. The bottle warmers can overheat liquids and baby food, posing a burn hazard to adults and babies. The firm has received 10 reports of the bottles overheating, including one report of an adult who received a finger burn from touching a hot bottle. Consumers should immediately stop using the recalled bottle warmers and call the company for instructions on how to return the product for a full refund. Additionally consumers who return the products will receive a $25 merchandise card from the company. For additional information, consumers are asked to contact the company or visit the company’s website.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Product: Slow Cookers</th>
<th>Incident:</th>
<th>Hazard: Fire</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Montreal, Quebec, Canada importer/distributor in cooperation with the CPSC is recalling approximately 25,000 slow cookers. These slow cookers were manufactured in China and sold exclusively at a single department store chain nationwide from July 2009 through December 2009. The slow cooker’s control panel can overheat and melt, posing a fire hazard. So far the company has received 60 reports of the control panels of the slow cookers smoking, melting and sparking and 3 reports of panels catching fire. Fourteen incidents resulted in minor damage to the countertops. There have not been any reports of injuries. Consumers should immediately stop using the recalled slow cookers, unplug them and contact the company for information on receiving a full refund. For more information, consumers can contact the company or visit the company’s website.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Crisis Control is a newsletter jointly published by RQA, Inc. & Catlin Group.

For more information about these topics and more, please contact:

Carol Kozlowski, CPIM  
Manager of Crisis Management, RQA, Inc.  
Phone: 708-364-8950, x129  
Email: c.kozlowski@rqa-inc.com

London, UK:  
Neil Evans: neil.evans@catlin.com  
David Burke: david.burke@catlin.com  
Stuart Allen: stuart.allen@catlin.com  
Ian Bailey: ian.bailey@catlin.com  
Email: CrisisManagement@catlin.com

Atlanta, US:  
Margaret A. Curcio, CIC: margaret.curcio@catlin.com

[www.rqa-inc.com](http://www.rqa-inc.com)  
[www.catlin.com](http://www.catlin.com)